

Crocodile Specialist Group Steering Committee Meeting

(Harare, Zimbabwe; 10 June 1997)

Present: D. Jelden (chair), P. Ross (Exec. Officer), J. Hutton, O. Behra, G. Webb, R. Jenkins, A. Larriera, K. van Jaarsveldt, H.C. Koh, D. Ashley, L. Collins, L. Aquino, S. Broad, C.H. Giam, Y. Takehara, O. Menghi, M. Quero, Y. Raharajo. CSG members: S. Ranot, E. Fernandez, C. Foot, A. Imhof, J. Villalba-Macias, M. Stambulie, C. Lippai, R. Fergusson, I. Games, G. Cortez, C. Manolis, Ramandbison. Observers: J. Perez Ramirez, H. Benitez, G. Salinas (Mexico), V. Lichtschein, P. Amvet, C. Pina, C. von Fink, P. Donayo, P. Siroski (Argentina), J. Tindigarukayo, Y. Moyini (Uganda), L. Siege, O. Mbanwa, B. Kibunda, J. Kibere, O. Kitwara, B. Mbanao, L. Melamari, C. Mlay, J. Kayera (Tanzania), H. Zambrano, G. Andrade (Colombia), R. Owen (USA/Paraguay), 2 representatives of Madagascar, J. Berney, T. Sullivan (IUCN), J. Kundaeli (CITES).

The meeting was opened at 8.04 p.m. by Deputy Chairman of the CSG, Dr. D. Jelden, who explained that the Chairman, Professor Messel, could not be present, but sent his apologies and best wishes for a good meeting. Thanks were expressed to the government of Namibia for providing a room for the meeting. The meeting agreed to re-order the agenda to deal with priority matters pertaining to the CSG position regarding proposals at the 10th COP and other matters would be considered if time was available.

Finance. The Executive Officer presented an interim financial report. CSG began the year with a balance of \$31,781.29. Revenue for the year was \$19,204.77 and expenses \$48,531.03 leaving a current balance at 30 May of \$2,455.03. This precarious cash position had come about due to large expenses including air travel to this meeting (\$4,345.00) and the Newsletter. The cash position was expected to improve shortly with receipt of major pledged donations. The Executive Officer was urged to expedite sending out donation requests to bring in donations for the year and as always, Steering Committee members were asked to assist with identifying donors.

CSG Business. A report on the organization of the 14th Working Meeting in Singapore in 1998 was presented. The Singapore Reptile Skin Trade Association has formed a committee to organize the meeting and had met with the Executive Officer in Singapore the preceding week. Dates are confirmed as 13 - 17 July 1998. The meeting suggested that three days of formal presentations with an emphasis on workshops and discussion of broad issues was sufficient. The committee will work closely with the Executive Officer to develop a program and preliminary announcements will go out in the current Newsletter. The draft Revised Action Plan (1995) is in final stages of revision after which production in conjunction with IUCN will proceed. The Executive Officer reported on a Regional Meeting of CSG members in India held in Gwalior, June 5-7. Indian CSG members presented current information on their work and a draft conservation strategy for crocodiles in India was prepared. The strategy will be finalized and presented later this year with the aim of reporting preliminary results of action at the Singapore meeting in 1998. A more detailed report is given below (pp. 1-12).

CITES Proposals. The meeting then turned its attention to proposals submitted for consideration at the current 10th COP of CITES. It was noted that these proposals had already received extensive review by CSG published in the Newsletter and had been modified in response. This meeting sought to clarify remaining uncertainties and questions and provide definitive recommendations for transmission through IUCN to the COP.

Argentina. Four issues were identified: 1) The process by which Argentina would implement the necessary tagging of skins under CITES Res. Conf. 9.22; 2) The possible impact of opening ranching and trade on *C. latirostris* on sympatric populations of *C. crocodilus yacare*; 3) The mechanisms to control extension of ranching to other provinces in Argentina and 4) the manner in which future changes to the program, including extension to other Provinces, should be handled under CITES Res. Conf. 8.22.

Alejandro Larriera responded, describing that hatchlings in the program would receive a web tag at birth which would enable tracking and inventory control within farms and of any animals subsequently released to the wild. Upon slaughter, animals would receive a CITES tag issued by the Management Authority of Argentina. A system of internal transport documents would be required to transfer tagged skins from Santa Fe to the Management Authority who verifies the tags, matches them to original web tag records and inventories and finally issues export documents, including tag numbers as required by Res. Conf. 9.22. This system was thought to make introduction of illegal wild animals into ranches or as skins into trade very difficult. Ranching is currently restricted to Santa Fe Province and other Provinces wishing to establish ranching programs will be required to develop the same level of population status evaluation, technical expertise and regulatory control as Santa Fe. The Management Authority of Argentina would then report any additional ranching programs to the CITES Standing Committee for final approval with input from the CSG. This met the requirements of Conf. Res 8.22. Finally, as the skins of *C. c. yacare* are readily distinguished from *C. latirostris* and have much lower value, and the program does not involve wild hunting, no impact on *C. c. yacare* was anticipated, except possibly enhanced habitat protection as a result of the conservation measures undertaken for *C. latirostris*. On this basis the meeting agreed to give the proposal unqualified support.

Madagascar. Four issues regarding the Madagascar proposal were identified: 1) The level of illegal hunting; 2) exports of locally manufactured products to neighboring countries; 3) the enforcement capacity of the Madagascar authorities and 4) the accuracy and timeliness of reporting to CITES. O. Behra assisted representatives of the Madagascar Management Authority with translating their response. Noting that Madagascar has presented a proposal for downlisting under 3.15 ranching three times without success, the Madagascar authorities acknowledged that their management system was still not fully operational. However, they have taken extensive recent steps to improve the situation which are described in the CITES report of S. Nash in late 1996. They explained that Madagascar can be divided into three regions; the west where crocodiles remain fairly abundant, the center where there is little habitat and the east where the pressure from

human populations has made crocodiles scarce. The ranching program collects eggs from the western region and impact on the population there is minimal.

Recent enforcement measures have decreased illegal hunting. An ongoing project funded by CITES was developing management options following which controlled hunting would be allowed in specific areas. New controls were in place at the international airport to restrict illegal exports. Crocodile ranchers in Madagascar had proposed to provide ranched skins directly to local artisans from ranch stock to discourage additional uncontrolled wild harvest. Comments from the CITES Secretariat, TRAFFIC and WCMC established that earlier incomplete reports and anomalies within them had been resolved. Jaques Berney reported from his position as an independent consultant to the CITES Secretariat that he observed tremendous efforts in Madagascar to improve the situation. Regulations to place control on local processors and the exports of products were underway. The meeting concluded that a full evaluation of the Madagascar situation would not be available until after the completion of the current CITES technical aid project. It was recommended that CSG support the proposal with the suggestion that Madagascar endeavor to produce a comprehensive management plan for crocodiles similar to that recently developed by Indonesia. A suggestion that CSG should review the management program was not supported, however, this can always be done at Madagascar's request, and review of the program could be achieved through the CITES Animals Committee significant trade (CITES Res. Conf. 8.29) process. The meeting recommended support of the proposal with these additional recommendations.

Uganda. Three issues were identified with the Uganda proposal: 1) The nature of the proposed monitoring program; 2) the system for inspection and control of tagged skins and 3) the procedures proposed to control egg harvest and trade. Representatives of the Management Authority of Uganda responded noting that they have been successfully managing their export quota of over 4,000 crocodiles annually for several years. They explained that jurisdiction for both crocodile ranches and management of the wild population was now in the hands of a single new wildlife authority and that new statutes to control wildlife use were adopted in 1996. They explained that monitoring of released juvenile crocodiles was interrupted due to financial constraints but that inspection of skins is rigorous. They noted that previous reporting errors to the CITES Secretariat had been remedied and a new monitoring and research unit was established. Aerial surveys in 1996 suggest that crocodiles are expanding their range in Uganda, re-occupying several areas of former range. Finally, they reported that the reintroduction program was undergoing review to establish its effectiveness and may be modified.

The CITES Secretariat additionally informed us that the proposal was prepared with assistance from CITES for survey work. There was no intention to establish wild harvest except a very modest problem animal control program and that the government has restricted the establishment of any additional ranching ventures until the viability of the current program is tested and the necessary finance and technical expertise is available. The meeting recommended that CSG support this proposal.

Tanzania. Request for quotas for wild harvest under a ranching program. Dietrich Jelden clarified that this matter involved two separate issues: 1) The determination for a wild harvest quota for 1997 under the terms of the annotated downlisting accepted by the 9th COP in 1995 and 2) the determination of quotas for 1998-2000 which were the subject of a proposal by Tanzania to the current 10th COP.

Regarding the quota for 1997, consideration of this matter was dependent upon receiving a report from Tanzania regarding the distribution and management of wild harvest in 1994-95 in relation to the distribution of human-crocodile conflicts which had not been received prior to the meeting.

Dr. Ludwig Siege, who is director of the 'Selous Conservation Program' which includes a community wildlife program in the Selous area funded by the German government reported that new information on this topic was available and in possession of the Tanzanian representatives who wished to share it with CSG. He further confirmed the extreme problem of human mortality due to crocodiles and the difficult political situation this had created in Tanzania. After discussion the following points were agreed: 1) The population of crocodiles in Tanzania is large and this now very well known from recent quantitative surveys reported to CITES and CSG. 2) It seems likely that this population can easily sustain harvest at the levels proposed of 1,000/year. 3) The problem of human crocodile conflict requires immediate effective action by Tanzania. 4) The development of functional crocodile ranches in Tanzania remained difficult due to lack of financial support and technical expertise. 5) Long term management of wild harvest in Tanzania under their ranching downlisting was not legal and a violation of Res. Conf. 8.22. The basic issue for the CSG was not the size of any wild quota but the effectiveness of Tanzania's management and conservation program for such a quota.

The meeting recommended that any consideration of wild quotas could only be made if Tanzania formally agreed to present a proposal for complete downlisting of its crocodile population under Res. Conf 9.24 to the next (11th) COP. The meeting further recommended that Tanzania establish effective measures to manage and control wild harvest for the current and any future quotas and that these be integrated into Tanzania's existing crocodile management plan. The representatives from Tanzania indicated their willingness to accept these conditions.

It was noted that an additional issue for CSG was the nature of CSG support for any quota and the perceptions of CSG's credibility on this issue within CITES. Tanzania is not unique in having high human mortality from crocodiles and this should not be a precedent for allowing wild hunting. The restriction of wild harvest to programs downlisted to Appendix II under Res. Conf. 9.24 was strongly recommended. It was additionally noted that approval of wild quotas would only address human-croc conflict if the animals were in fact removed from problem locations and should this not be done, continuation of the conflict problem must be judged as due to inadequate management of the quota and not an excuse for further quota increases.

The meeting closed this issue by agreeing to meet with Tanzanian Representatives the following day to examine the new data and proposed quota harvest management procedures then conclude an agreement on a recommended quota at that time.

[This meeting was held on 11 July 1997. CSG presented an outline of appropriate management activities that a wild harvest should include such as size and season limits, recording and reporting of take, and regular monitoring of effects of harvest. After discussion and examination of the new information from Tanzania, the Tanzanian delegates formally agreed to declare their intention to present a proposal to downlist their population under CITES Res. Conf. 9.24 at the next COP, to commit to the establishment of management procedures in the wild harvest and to report the results of surveys and harvest and export statistics to the Secretariat. It was made clear that the CSG's response to the downlisting proposal would be strongly influenced by the demonstrated success of Tanzania in implementing these measures in 1997-1999. On the basis of these commitments by the Tanzanian authorities, CSG agreed to support the CITES Secretariat's recommendation for approval of their current quota proposal for 1,000 wild harvested crocodiles annually 1998-2000.

The following statement in support of the proposal was prepared:

'In the IUCN analyses of proposals delegates will see that some reservations were expressed based upon the proposal as it was submitted. However, since that time we have engaged in an exchange of correspondence with Tanzania and the Secretariat, received additional new information on the distribution of problem crocodiles in Tanzania, engaged in discussions with the Tanzanian delegation, and provided them with technical advice and recommendations for management of a wild harvest quota. 'Based on these we draw the attention of the Parties to the following:

'First we congratulate Tanzania on the evident efforts they have made to comply with CITES reporting requirements agreed to at the 9th COP. We also draw attention to the extensive information presented in the technical document as an annex to their proposal in which the results of extensive surveys of crocodiles in Tanzania are presented. This information indicates clearly that crocodiles remain abundant in Tanzania. We also acknowledge the ongoing tragedy of human mortality caused by crocodiles in Tanzania and the continuing need to ensure human safety by removing large crocodiles near habitation.

'The CSG has reviewed this proposal in detail and we conclude that the proposed wild harvest of 1,000 plus 100 trophy specimens will not be detrimental to crocodile populations and appears to be consistent with Conf. Res 8.22.

'Considering the commitment made by Tanzania to present a proposal for downlisting to App II under Conf. Res. 9.24 at the next COP and their commitment to institute management procedures to regulate and monitor the wild harvest, we suggest that these represent substantial progress toward a well designed and sustainable management program.

'We urge Tanzania to institute the proposed management procedures and to submit the down listing proposal and we support the Secretariat in recommending that the Parties approve the proposal.'

Additionally the following letter to the CITES Secretariat was drafted:

11 June 1997

Mr. John Kundaali

CITES Secretariat

RE: Quota for harvest of wild Nile crocodiles in Tanzania.

Dear Mr. Kundaali: With this letter I would like to advise you of the extensive consultation between the Tanzanian delegation and CSG at the 10th COP. We held meetings 10 and 11 June 1997 with the Tanzanian delegation and representatives of the Tanzanian wildlife department.

As you know, the annotation to the approval of a quota for wild harvest of crocodiles in Tanzania approved by the Parties at the 9th COP recommended that further quotas for wild harvest beyond 1996 should be considered contingent upon receiving a report from the Tanzanian Wildlife Management Authority to the Secretariat reporting on the management and results of the wild harvest. This report has now been submitted. In addition, considerable new information on the surveys of crocodiles in Tanzania and the robust status of the population is contained in a technical report included as annex to Tanzania's proposal to the 10th COP. We are also aware of the reports made by Tanzania to the Secretariat on the export of skins harvested under this quota in 1995 and 1996.

The CSG congratulates Tanzania for now having met the requirements of the annotation, and providing new information indicating adequate management of the harvest and export of the quota following CITES procedures. In the light of Tanzania's commitment to fully adhere to the provisions of CITES Resolution 8.22 and to present a proposal to downlist their Nile crocodile population under Conf. Res 9.24 to the next meeting of the parties, we recommend that the Secretariat accept the request of Tanzania to export 1,000 skins of wild crocodiles in 1997 in addition to 100 trophy specimens.

Yours sincerely,

Professor H. Messel

Chairman Crocodile Specialist Group

Problems arising from the consolidated resolution on ranching. The CITES Secretariat has undertaken a consolidation of Resolutions which address the same topic. In combining the several resolutions addressing ranching some questions of applicability and emphasis have arisen which may not be beneficial to present or future crocodilian ranching projects. These include the continuing problem of Res. Conf. 5.16 which imposes unreasonable marking requirements on crocodilian products which are unnecessary given the universal tagging resolution. A second problem is the emphasis given to re-introduction as a component of ranching programs implying that reintroduction was mandatory. The meeting therefore recommended that if possible the consolidated resolution be referred to the CITES Animals Committee for any necessary revision, at which time the CSG can suggest wording to meet these concerns. This was subsequently accepted by the COP.

Confirmation of the registration of captive breeding farm for *C. acutus* in Honduras. The registration of the Honduras farm has been held up contingent upon the government of Honduras passing national law for CITES implementation and adequate regulations to control farm activities and exports. The Secretariat informed the meeting that these provisions had now been met and that USA and Venezuela had withdrawn their objections to the proposal. The Secretariat further explained that functional differences between Anglo-Saxon common law and Roman/Napoleonic code laws current in Latin America precluded legislation of forms identical to models familiar to many countries. Nevertheless, the forms adopted in Honduras were judged by the Secretariat to approach the necessary level for adequate CITES implementation. As approval of this proposal lies entirely with the Parties, the meeting agreed to affirm that CSG had no remaining scientific or conservation concerns regarding it. [This was subsequently done in Committee I of COP and the Honduran registration was approved without objection after several Parties referred to the CSG recommendation in support of the proposal.]

This ended consideration of CITES COP 10 issues.

Evaluation of code of practice for Australian crocodile farms. A draft of the code of practice was sent by the Australian Government to CSG for comment and evaluation. Grahame Webb explained that the Australian government required development of such codes for all primary industries and that he had drafted the present code to be as widely flexible as possible to encompass the full range of activities with crocodiles in Australia from legal aboriginal subsistence hunting to ranching, farming and public exhibition. The Executive Officer was asked to provide copies of the draft code upon request and to coordinate a response to Australia by mid-July.

Use of funds generated by sale of confiscated crocodilian material to support conservation action. There are several situations where government agencies are seeking to sell confiscated stocks of skins and apply the funds generated to conservation via the CITES Secretariat. Current examples are Paraguay, Uruguay and Belgium. In the case of Belgium, the CITES Secretariat and the European Union was requesting CSG to provide advice on the best use of such funds. The question had circulated among Steering Committee members in Latin America who had articulated several general principles: 1)

The country of seizure and the country of origin of seized material should be consulted on the use of the funds and have access to the funds; 2) funds should be channeled through transparent mechanisms to well supervised institutions to avoid any suggestion of improper use; 3) funds should be applied to conservation needs with some flexibility to have the best effect on the most urgent conservation needs and 4) the CSG should advise on the conservation priorities for the application of such funds. The Executive Officer was instructed to prepare a letter to be sent by the CSG Chairman with these points to assist the Belgian Authorities and the CITES Secretariat. It was also suggested that the matter could receive additional discussion at the CSG Regional Meeting in Mexico in August.

9 June 1997

Dr. Obdulio Menghi

CITES Secretariat

Geneva, Switzerland

RE: Disposal of confiscated materials to benefit conservation

Dear Dr. Menghi:

Further to your inquiry and our preliminary response on the question of how to best manage the application of funds raised from the sale of confiscated crocodilian materials, particularly in reference to the proposed auction of Caiman skins in Belgium. We initiated discussion among the South American members of our Steering Committee and the matter was discussed before our full Steering Committee on 10 June 1997. I can now offer the following general expansion of our earlier response.

1) We confirm in principle that we agree funds raised by the sale of crocodilian materials confiscated by competent authorities and disposed of by legal means should be applied to the conservation of crocodilians and their habitats. Substantial conservation benefits for crocodilians would result from such action.

2) We think it is imperative that such funds should be deposited in a properly administered and audited account so that the management and disposition of the funds is completely transparent. We are also mindful that great care must be taken in this process to ensure that such use of confiscated materials is not seen to be an encouragement of illegal trade.

3) We think the funds should be applied to crocodilian management programs in range states, for projects that contribute to the conservation of crocodilians and their habitats. We further suggest that the funds should be applied on a priority basis to those projects

and species deemed of most urgent conservation need. In this sense, funds raised from the sale of caiman skins (relatively common and not endangered species) would not necessarily be applied to caiman management but instead might be applied to the conservation of endangered species more urgently in need of conservation action.

4) To accomplish this we suggest that consultation should occur between the Management Authorities in the country of origin of the materials (if known), the confiscating Authority and the CITES Secretariat. The CSG would be pleased to advise this process.

5) The disposition of funds to projects should be guided by the conservation priorities presented in the CSG Revised Action Plan for Crocodile Conservation.

We suggest the application of funds derived from confiscations following the guidelines above would ensure that all the participants in the process would be protected from any suggestion of impropriety or special interest and that the funds would then be applied to the most useful purposes for the conservation of wild crocodilians. The Crocodile Specialist Group would be pleased to actively assist this process in any way that the interested Parties and the Secretariat might wish, including, if desired, the administration and disposition of such funds in consultation with them as outlined above.

I hope we can work together to accomplish this useful conservation activity.

Yours Sincerely,

Professor Harry Messel

Chairman, Crocodile Specialist Group

cc. CITES Management Authority of Belgium

CSG Review of Indonesian Management Plan. The review report was presented for information. CSG has recommended that Indonesia may re-open export of crocodile skins following the implementation of several specific management needs (see Newsletter 16 (1)).

Review of Zimbabwe crocodile management. Chris Foot of the Crocodile Farmers Association of Zimbabwe reported that following productive discussions between CFAZ and the new Zimbabwe Wildlife Authority, a new Policy and Plan for Crocodile Management in Zimbabwe had been approved. The new plan responds to recommendations made by the independent review of the program completed last year and from the CSG. The program establishes a system of zoning for crocodile use ranging from complete protection in national parks to controlled use in an adaptive management

program in some state and communal lands. Responsibility for setting quotas for the wild resource, monitoring and CITES export documentation is assigned to the Department of National Parks and Wildlife Management and monitoring of selected wild crocodile populations will be instituted. The new plan seems to substantially meet all the recommendations of CSG. The meeting congratulated the Zimbabwe government and CFAZ for producing such a satisfactory result from the review process.

Guidelines for the evaluation of crocodile management programs. It was reported that the draft guidelines approved at the Argentina Steering Committee meeting were used with great success in the reviews of the Indonesian and Zimbabwe programs proving flexible and useful topics for the reviewers to consider. Continued application and refinement of these working guidelines was recommended.

Development of crocodile farming in Cambodia. Hank Jenkins reported on his recent trip to Cambodia. He confirmed previous reports that crocodile farming is widespread in Cambodia with possibly 300- 400 small scale farms for *C. siamensis* in operation based on the model of Thailand crocodile farming. Control and operation of these farms would not meet the standards of CITES Res. Conf. 8.15 on captive breeding but were still a strong incentive to Cambodia to become involved in CITES activities and develop regulatory mechanisms and conservation programs. The industry was presently expanding with many small operators establishing breeding stock of just a few animals and selling the offspring to larger farms. A detailed report with recommendations was submitted to the Cambodian government for their consideration. To facilitate the process of developing sustainable use and conservation of crocodiles in Cambodia the meeting acknowledged the need for broader contact and advice from CSG to Cambodian farmers and government. The forthcoming 14th Working Meeting in Singapore in 1998 was an opportunity to further this goal. Dr. Giam advised that through his connections with the ASEAN organization he may be able to also facilitate contact and advice. The great importance of establishing a strong linkage between the growing crocodile industry and conservation of wild crocodilians was noted. The Executive officer was asked to write to CSG member Mr. Nao Thuok in Cambodia to develop these recommendations.

CSG Information Services. Lorrain Collins and Steven Broad submitted a discussion paper on the needs for coordinated compilation and reporting of information on crocodiles and mechanisms by which this might be achieved. Due to the lateness of the hour the meeting agreed that the Executive Officer should pursue this directly with them, circulate the discussion document and advise the Steering Committee by mail of progress.

Export of live crocodilians for commercial purposes. Don Ashley and Kevin van Jaarsveldt expressed concerns about recent increase in demands for live crocodilians which may be used to establish captive breeding operations outside the range of the species and to the detriment of regulatory and conservation goals. Don advised that the USA was currently not issuing permits for live export pending a review of their regulations and the probable imposition of a permanent ban. Kevin asked for the group to further define its position and determine if the current policy on exotic species is still

adequate. The deep complexities, practical difficulties and divergent opinions on this topic which have previously been evident were clear after short debate. The meeting then asked for a small working group to convene and prepare a position statement on the situation for further consideration by the CSG. Don Ashley, Kevin van Jaarsveldt, Lucy Aquino and Olivier Behra agreed to serve on this group. There being no further business, the meeting adjourned at 10.47 pm.—P. Ross, *rapporteur*.

Following additional discussion with CFAZ the following letter was drafted.

20 June 1997

Mr. Chris Foot

Crocodile Farmers Association of Zimbabwe

Harare, Zimbabwe

Dear Chris:

Thank you for bringing the concerns of CFAZ about exports of live crocodiles to our attention. This problem is not restricted to Zimbabwe but has become a persistent concern to crocodile producers worldwide. We discussed the matter at our Steering Committee meeting 10 June 1997 and convened a small working group to develop a position for CSG. I do not yet have their final report, but the substance of their discussion confirmed our concerns.

The establishment of large commercial groups of captive bred crocodiles outside crocodile range states is not desirable and poses several conservation problems. Foremost among these are the regulatory difficulties encountered in meeting CITES requirements for skin exports or additional spread of live animals from ex-situ facilities where the Management Authorities may not have either interest or competence in crocodile management and conservation. CSG has previously expressed its concerns about negative ecological effects of introduced crocodilians and the potentially destabilizing effects on established sustainable use programs and the conservation efforts associated with them.

We continue to believe that the most effective regulation of transfer of live crocodilians for commercial purposes should be applied by the Management Authorities in the country of origin. In our opinion, the reasons outlined above provide an adequate basis for the determination by a Management Authority that such export is detrimental to the conservation and management of national crocodile populations, providing a basis for the denial of CITES export permits. We note that the United States has recently suspended issuing permits for live alligator exports on these grounds. Your new Policy and Plan for Crocodile Management in Zimbabwe places responsibility for such a determination in the hands of the Director of National Parks and Wildlife (section 2.4 c. and g.). We would

encourage the Director to take such action as necessary to control and inhibit the export of live crocodiles from Zimbabwe.

Yours sincerely,

James Perran Ross

Executive Officer CSG
