This document has been submitted by Madagascar.

Technical comments in support of amendments to CITES appendices submitted by Madagascar

Madagascar CITES Scientific Authority and CITES Management Authority, September 2004

General

- The CITES Scientific Authority in Madagascar with the Malagasy government and in consultation with committees of experts and NGOs unanimously recommended these amendments to CITES appendices.
- These amendments to CITES appendices would assist efforts of Madagascar's new government to control trade in these species, which are both endangered and highly sought after in international trade.
- A comprehensive action plan has been adopted by the Malagasy government following the country based Significant Trade Review aimed at improving control over trade in CITES and non-CITES species. These listing proposals submitted by Madagascar are an important part of the action plan, which also includes greater in-situ protection and increased monitoring and control of collection and trade.
- In-situ population monitoring is planned by the CITES Scientific Authority for species currently on and proposed for Appendix II.
- Many species are under increasing pressure from continuing degradation and fragmentation of forests and other wildlife habitat (8.6% deforestation from 1990-2000 Steininger et al 2003 and approximately 40% forest loss since 1950 Alnutt et al. 2004) in Madagascar so a diversity of different measures are needed to protect those that are also under threat from wildlife trade. Madagascar requests the support of other parties to the convention to assist with controlling trade in particularly vulnerable species proposed for CITES Appendices.
- All the species proposed for CITES Appendix amendments will be included as protected species in the current revision of national legislation as part of the CITES Action Plan.

Alnutt, T.F., Powell, G.V.N., Ferrier, S., Ricketts, T.H., Steininger, M.K. and Manion, G. (2004). Quantifying biodiversity loss in Madagascar using biological inventories, environmental data and a 50-year record of deforestation. Society for Conservation Biology meetings, New York 30 July-2Aug 2004.

Steininger, M., Harper, G., Juhn, D. and Hawkins, F. (2003). Analyse de changement de couverture forestière nationale 1990-2000. CI Center for Applied Biodiversity Science, Washington DC

Transfer of *Pyxis arachnoides* from Appendix II to Appendix I (CoP13 Prop.15)

- *Pyxis arachnoides* meets the criteria for listing in Appendix I set out in CITES Resolution 9.24 Rev.CoP12.
- *Pyxis arachnoides* has a restricted area of distribution in the Southwest coastal areas of Madagascar. The area of distribution as well as the number of individuals and the area and

quality of habitat have been observed to decline (Res. 9.24 Annex I, Criterion B iv). The coastal zone is heavily used for grazing, agriculture and settlements.

- The species is particularly vulnerable to exploitation due to its biology (Res. 9.24 Annex I, Criterion B iii). It has a very low reproductive rate (one egg per clutch) and matures very late at 12 years (not two years, a mistake in the English translation of the proposal).
- The species consists of three distinct sub-species (*P.a.arachnoides, P.a.brygooi, P.a.oblonga*) with discontinuous ranges. Remaining populations are believed to be disjunct from each other (Caccone et. al. 1999). No detailed data are available but the sub-populations are believed to be small (Res. 9.24 Annex I, Criterion A).
- The massive exploitation in recent years has led to serious population declines and extinction of local populations in the past (for example around Toliary). Moreover, habitat loss and exploitation for illegal trade result in ongoing population declines. (Res. 9.24 Annex I, Criterion C i).
- According to UNEP/WCMC trade data in the years 2000 and 2001, 3.889 *P.arachnoides* and 506 *Pyxis spp*. were reported as exported from Madagascar. The species is sought after in the international pet trade and specimens have been on sale for 600 US$ each. The species is also found in illegal trade, for instance 218 *P.arachnoides* were seized on La Réunion in 2002.
- Pyxis arachnoides is currently listed as "Vulnerable" by IUCN, however a recent IUCN Conservation Assessment and Management Plan (CAMP) proposed the species for listing as "Endangered". This assessment was reviewed and approved by the IUCN Turtle and Freshwater SSC Specialist Group in 2004.

Inclusion of *Uroplatus* spp. in Appendix II (CoP 13 Prop. 27)

- Madagascar proposes listing in Appendix II according to CITES Resolution 9.24 Rev.CoP12, 2a A (*Uroplatus fimbriatus, U. sikorae, U.lineatus, U.ebenaui, U.henkeli, U.phantasticus)* and 2b B (*U. malama, U.malahelo, U.alluaudi, U.pietschmani, U.guentheri)*

- Several species (*Uroplatus malama, U.malahelo, U.alluaudi, U.pietschmani*) have restricted and fragmented ranges.

- They generally occur at very low densities – studies completed by Raselimanana and Mahaviasy in 2003 (see attached table). Raxworthy and Nussbaum (2000) found *U. sikorae* and *U.fimbriatus* at 13-50 individuals/ha.

- There is a risk of confusion of identification of species (eg. between *U.pietschmani* and *U. sikorae,* between *U. guenteri* and *U. alluaudi*), which justifies the entire genus being listed on Appendix II.

- There is already an example of localised depletion of *U. henkeli* at Lokobe, Nosy Be, as a result of collection for trade (Raxworthy in litt 2004).

- Trade data show that there is a clear international demand for these species particularly *U.fimbriatus, U.lineatus, U. sikorae, U. ebenaui, U. henkeli, U. phantasticus.*

See the attached table for a summary.

Inclusion of *Langaha* spp. in Appendix II (CoP 13 Prop. 28)

- Madagascar proposes listing on Appendix II according to CITES Resolution 9.24 Rev.CoP12, 2a A (*Langaha alluaudi, L.pseudoalluaudi)* and 2b B (*L. madagascariensis)*

- All species occur at low density (*L. alluaudi* only 3 individuals found in a 3 month inventory in Mikea forest; *L.pseudoalluaudi* only known from 2 specimens; 6 specimens of *L. madagascariensis* found in 7 days of intensive searching).

- Two species have restricted distributions: *L.alluaudi, L.pseudoalluaudi*.

- Langaha species are apparently currently traded at relatively low levels but US import data indicates higher levels of trade than Malagasy export data and it is feared that trade will put the rarer species (*L.alluaudi, L.pseudoalluaudi)* at risk of extinction.

- The entire genus is proposed for Appendix II to assist control and monitoring of trade.

Inclusion of *Lycodryas (Stenophis) citrinus* in Appendix II (CoP 13 Prop. 29)

- Madagascar proposes listing on Appendix II according to CITES Resolution 9.24 Rev.CoP12, 2a A

- The species is only known from two sites and at low densities.

- It is likely that there will be a growing demand for this highly attractive species. There is already evidence that the species is in international trade and listing on Appendix II will assist with control and monitoring to protect it from over-exploitation.

Inclusion of *Carcharodon carcharias* in Appendix II (Cop 13 Prop. 32)

- See comments already sent to CITES Secretariat by Madagascar and Australia

Inclusion in Appendix I for *Chysalidocarpus (Dypsis) decipiens* (Cop 13 Prop. 46)

- In 1995, Dransfield counted 200 individuals of this species. Now nine years later (2004) are probably very few trees left in the field because:
    1. The species is selectively exploited and killed for its shoots which are used as food.
    2. The individuals grow in very rocky lands outside protected areas and in very threatened habitat due to human pressure.
    3. This last year only 70 seeds were exported, because of the rarety of fruiting individuals, in addition: The species does not flower and fruit every year, their regeneration rate is very low and their growth very slow.

- Now the collection of seeds for exportation is not under any regulation and collectors have a tendency not to leave any seeds on site for natural regeneration.

- Seeds would be covered by Appendix 1 listing. If seed exportation is not controlled, this will lead to the rapid decline or even the extinction of the population.

- In parallel the implementation of a local ex-situ multiplication should be done in order to conserve this *Dypsis decipiens* from extinction.

**Supporting information for Madagascar's proposal to include *Uroplatus* spp. In Appendix II**
**13th Conference of Parties, Bangkok, Thaïland, October 2004**

| Species name | *Uroplatus. fimbriatus* | *Uroplatus lineatus* | *Uroplatus alluaudi* | *Uroplatus ebenaui* | *Uroplatus henkeli* | *Uroplatus sikorae* | *Uroplatus phantasticus* | *Uroplatus pietschemani* | *Uroplatus guenteri* | *Uroplatus malama* | *Uroplatus malahelo* |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Habitat | Arboreal, specific, very vulnerable | Arboreal, specific, very vulnerable | Habitat limited to transition forest in sub-humid climate | Habitat limited to under story in shaded low altitude forest a | Arboreal. In low altitude rain forest. | Arboreal in low and medium altitude forest | Arboreal in eastern rain forest | | | | |
| Distribution | Eastern Madagascar low altitude rain forest. Fragmented distribution. | Very localised and fragmented distribution in Eastern Madagascar. | National Park in north Amber Mountain mid-altitude; very restricted distribution. | Very localised in north west and extreme north and very fragmented, | Very localised in north west and north and very fragmented, | Large distribution but fragmented, west, east and north. | Eastern rain forest, fragmented distribution. | Very restricted distribution | Very restricted and fragmented distribution | Very restricted distribution | Very restricted distribution. Forest between 200m and 1200m altitude |
| Number exported<br>2001<br>2002<br>2003 | <br>1427<br>1000<br>1262 | <br>947<br>698<br>688 | <br>37 | <br>1410<br>678<br>1096 | <br>1292<br>966<br>1134 | <br>1502<br>1347<br>1129 | <br>1770<br>1991<br>1975 | Species not currently in trade but must be included in Appendix II to facilitate control of trade of the entire genus. | *Species not currently in trade but must be included in Appendix II to facilitate control of trade of the entire genus.* | Species not currently in trade but must be included in Appendix II to facilitate control of trade of the entire genus. | Species not currently in trade but must be included in Appendix II to facilitate control of trade of the entire genus. |

| Species name | *Uroplatus. fimbriatus* | *Uroplatus lineatus* | *Uroplatus alluaudi* | *Uroplatus ebenaui* | *Uroplatus henkeli* | *Uroplatus sikorae* | *Uroplatus phantasticus* | *Uroplatus pietschemani* | *Uroplatus guenteri* | *Uroplatus malama* | *Uroplatus malahelo* |
|---|---|---|---|---|---|---|---|---|---|---|---|
| Population density in a pilot site (Raselimanana & Mahaviasy 2003),* | Transect of 1000 metres during 7 days (6 individuals) | Transect of 1000 metres during 7 days (1 individual) | Quadrat of 50x50 metres during 7 days (1 individual) | Transect of 1000 metres during 7 days (6 individuals) | Transect of 1000 metres (4 individuals) | Transect of 1000 metres (4 individuals) | Transect of 1000 metres (1 individual) | | | | |
| Role of the species in the ecosystem | Insectivore and prey species => role as regulator in ecosystem | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations | Insectivore and prey species => role as regulator of populations |
| Pressure from trade | Exhaustive or repeated collection => local extinction in near future | Exhaustive or repeated collection => local extinction in near future | Illegal collection. Collection of eggs, easy to find. | Repeated collection in a restricted and fragmented distribution => risk of extinction | Species among the most traded each year | Species among the most traded last three years | Present in trade in significant numbers despite its low density in the wild. | Similar to *Uroplatus sikorae* so risk confusion | | Similar to *Uroplatis alluaudi* so risk of confusion. | |
| Criteria according to Conf. 9.24 (Cop12) | Annexe 2aA | Annexe 2aA | Annexe 2bB | Annexe 2aA | Annexe 2aA | Annexe 2aA | Annexe 2aA | Annexe 2bB | Annexe 2bB | Annexe 2bB | Annexe 2bB |