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OPINIONISTA

## Unregulated international trade in reptiles threatens South Africa's vulnerable species



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By Charan Saunders

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Charan Saunders has a BSC in genetics and microbiology. She went on to become a chartered accountant. She has worked in London as a finance manager in the forensic science field, and in Cape Town as the CFO of a major vaccine manufacturer. She has a strong interest in science, the environment and the long-term sustainability of natural resources.

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*his article was supplied by the Conservation Action Trust (<https://conservationaction.co.za/>).*

**T**X A new report, Plundered – South Africa’s cold-blooded international reptile trade (<https://emsfoundation.org.za/plundered-south-africas-coldblooded-international-reptile-trade/>), explores loopholes in the Convention on International Trade in Endangered Species (CITES) regulations and finds that an ineffective local permitting system is allowing the illegal international trade of South Africa’s reptiles.

While still awaiting the Department of Environment, Forestry and Fisheries’ (DEFF’s) investigation ([https://www.environment.gov.za/mediarelease/creecy\\_emsreports\\_wildlifeexports](https://www.environment.gov.za/mediarelease/creecy_emsreports_wildlifeexports)) into their previous report, Breaking Point (<https://emsfoundation.org.za/the-breaking-point-uncovering-south-africas-shameful-live-wildlife-trade-with-china/>), the EMS Foundation and Ban Animal Trading (BAT) have released the third instalment of the investigative report series, The Extinction Business (<https://emsfoundation.org.za/category/lobbying-for-wild-animals/>). EMS and BAT again appear to be fulfilling DEFF’s oversight function, exposing the unregulated export of 4,500 reptiles, snakes and amphibians between 2013 and May 2020 as exotic pets, food and leather.

CITES was set up to ensure wildlife trade is sustainable (<https://www.cites.org/eng/disc/what.php>), but it focuses on the most valuable species, traded in large volumes, and largely ignores lesser-known species. According to a recent article (<https://www.nature.com/articles/s41467-020-18523-4>) in *Nature Communications*, the scientific data on reptile species is unreliable and insufficient, with 30% of all reptile species not having been assessed for their IUCN Red List

status. CITES only covers 9% of reptile (<https://www.nature.com/articles/s41467-020-18523-4>) species while 36% are currently traded. This means 75% of the reptile trade is not covered by any international trade regulation.

It is the responsibility of DEFF to implement the CITES framework in our own domestic legislation as a baseline and, where CITES is inadequate, to legislate appropriately for South Africa.

Threatened or Protected Species (TOPS ([https://www.environment.gov.za/sites/default/files/gazetted\\_notices/nemba10of2004\\_publication\\_list\\_species.pdf](https://www.environment.gov.za/sites/default/files/gazetted_notices/nemba10of2004_publication_list_species.pdf))) regulations, under the Nemba Act, require the government to give national protection to listed threatened or protected species to ensure their survival in the wild. Activities such as the collection, breeding and export of these species without a non-detrimental finding ([https://cites.org/eng/prog/ndf/index\\_new.php](https://cites.org/eng/prog/ndf/index_new.php)) (NDF) to assess the effects of removal, should not be allowed because they may threaten the survival of the species in the wild.

Of the 2,179 indigenous tortoises identified in the report ([https://emsfoundation.org.za/wp-content/uploads/Plundered\\_SA-Reptile-Trade\\_BAT\\_EMS\\_for-web.pdf](https://emsfoundation.org.za/wp-content/uploads/Plundered_SA-Reptile-Trade_BAT_EMS_for-web.pdf)), 2,029 were exported to pet shops, cafés and traders, and even the ones destined for zoos were tagged for commercial trade. Most of these tortoises, exported as pets and food, are listed on CITES Appendix-II (<https://www.speciesplus.net/>). This requires an NDF before export permits can be issued and the issuing authority must ensure the specimen was legally obtained.

The South African Scientific Authority, however, has failed to prepare an NDF for any indigenous tortoise species, nor is there a system or the technology for checking their origin. Unperturbed,

South Africa is allowing the export of indigenous tortoise species, including the TOPS-listed Angulate tortoise, relying on the honesty of the exporters to declare the source as wild or captive-bred.

The report findings suggest that anyone contemplating surrendering their tortoise to a zoo should not imagine it will be rehabilitated and released. All tortoises that are confiscated or surrendered, including CITES-listed tortoises, are labelled captive-bred and many are then sold to South African wildlife traders. The National Zoological Gardens (Pretoria Zoo), which falls under the South African National Biodiversity Institute, and the Johannesburg Zoo supplied wildlife traders with hundreds of tortoises for the international market.

The report also found 262 snakes and 117 reptiles were exported to pet shops and pet cafés and alleges that the trade in reptiles and amphibians is driving poaching from the wild.

The majority of South Africa's snakes that are exported are wild-sourced and, along with most indigenous lizards, are not CITES-listed, meaning they can be moved out of the country without having to declare the source as wild or captive-bred. Verification of exports is poor, especially of venomous species, and the investigation found that CITES permits were issued for reptile species categorised as captive-bred when it is well known that these species do not breed in captivity.

Similarly, for amphibians, export permits were issued for some frogs, for which there are no registered breeding facilities, or which have never successfully bred in captivity. Notwithstanding the stipulations of TOPS, many of these are likely to have been sourced from the wild.

At least 50%

(<https://www.nature.com/articles/s41467-020-18523-4>) of these animals in the international pet trade are wild-caught or poached. It stands to reason, given the high cost of breeding facilities, lack of verification systems and poor training at customs, that it is much cheaper, and with slim chance of capture or consequence, to simply pluck specimens from the wild. This is unsustainable and should be banned.

*The global legal trade in wild animals is unsustainable and is stimulating the market for animals, fuelling the illegal trade. It is the loopholes in the legal system that are exploited by the illegal trade, and CITES, with limited facility to monitor and little apparent will to enforce compliance, is effectively toothless.*

According to Smaragda Low of Ban Animal Trading, “the commercial trade in reptiles and amphibians offers no conservation value. Whether taken from the wild or bred in captivity, they cannot be released and offer no value to conservation of the species in the wild.”

Trade decisions also cannot be divorced from welfare, health and ethical considerations. Reptiles are animals (<https://www.mdpi.com/2076-2615/9/10/821/htm>) capable of boredom, fear, pain and suffering, all trademarks of the animal trade. Lacking facial expressions and the ability to vocalise any distress, they suffer in silence. Their low metabolic rate means their suffering can be more prolonged than mammals. In addition to the 70% mortality rate at wholesalers, 75% of reptile pets die within the first year

(<http://www.psychologytoday.com/za/blog/animal-emotions/201911/sentient-reptiles-experience-mammalian-emotions>) at home.

Most emerging diseases

(<http://www.emro.who.int/fr/about-who/rc61/zoonotic-diseases.html>) are zoonotic,

and wildlife constitutes a large and unknown reservoir of bacteria and viruses. International trade endangers indigenous wildlife

(<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3371803/>) through the spread of disease

(<https://www.nationalgeographic.com/animals/2019/03/amphibian-apocalypse-frogs-salamanders-worst-chytrid-fungus/>) or predation

(<https://www.nationalgeographic.com/animals/2020/11/tegu-lizards-invasive-spreading-southeast-united-states/>) by escaped animals. The

spread of disease can also threaten livestock, rural livelihoods, international trade and human health.

The global legal trade in wild animals is unsustainable and is stimulating the market for animals, fuelling the illegal trade. It is the loopholes in the legal system that are exploited by the illegal trade, and CITES, with limited facility to monitor and little apparent will to enforce compliance, is effectively toothless.

DEFF, as the custodian of our environment, should be controlling the export of our indigenous reptiles and amphibians to ensure sustainability of trade. While TOPS-listed animals are protected, many of our indigenous reptiles, snakes and amphibians are not listed on TOPS, may not have been assessed for vulnerability and therefore have no protection. According to the Southern African Reptile Conservation Assessment (<http://sarca.adu.org.za/about.php>), information on these animals is incomplete, out of date and poorly collated.

Until accurate population assessments have been completed, the impact of trade on these species cannot be assessed. It should then follow that a moratorium be placed on the trade of all unassessed species until such an analysis has been done and proven not to have a detrimental impact on wild populations.

However, for the purpose of exotic food, pets and leather, which serve only to enrich a handful of traders, we are placing at risk not only our wildlife, but also health and many other livelihoods. Given that South Africa does not have the resources to enforce restrictions, an outright ban would be cheaper, safer and kinder. **DM**

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