

Lausanne, Warsaw
8 July 2019

The Honorable Blanca Rubio
California State Assembly,
State Capital Room 5175,
Sacramento, CA 95814

Re: Support for AB 719

Dear Assemblyman Voepel,

It has come to our attention that the implementation of California Section 653o of the Penal Code, which bans possession and trade in crocodile and alligator products, has been post-poned using Sunset provisions for many years: the latest being SB 1485 (Senator Hollingsworth: 2006-10), SB 609 (Senator Hollingsworth: 2009-15) and AB 2075 (Assemblyman Alejo; 2014-2020).

We write now to strongly support your Bill AB 719, to ensure trade continues after 2020, for the benefit of national and international crocodilians, and for the sustainable livelihoods of perhaps millions of people who depend directly and indirectly on this trade, at all steps through supply chains, from the wild populations to the final retail sale of fashion products.

As past Secretary-General's (EL 1982-1990; WW 1999-2010) of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), with a thorough institutional memory of world conservation (WW: "*The Evolution of CITES - 10th Edition* 2016), we can assure you that support for AB 719 is completely responsible, and consistent with global directions in conservation, which the United States of America has helped shape within CITES.

Prior to CITES coming into force (1975), there was very little known about the biology, conservation and management of crocodilians, despite serious concern about the depleted status of many wild populations being harvested for trade. At that time, many countries and states introduced protective legislation, and trade bans (like California's Section 653o of the Penal Code), as added precautionary measures. CITES provided another tier of protection against unsustainable use, with all crocodilian species listed on its Appendices, to ensure international trade, when permitted, was not detrimental to the survival of the species.

This united effort was remarkably successful. It stimulated a global research effort into the biology, conservation and management of world crocodilians, led by the United States, particularly Louisiana and Florida, but soon joined by Australia, Argentina, Zimbabwe, South Africa and Papua New Guinea.

It soon became clear that if given the opportunity, and if habitats were intact, crocodilians had a tremendous capacity to recover from depletion, and that they could

be used sustainably to benefit the people living with crocodilians. Realising benefits from trade was of critical importance with some species, because some are serious predators on local people and their livestock.

The Parties to CITES (1979-2018) have subsequently approved international trade for many national programs, throughout the world. Crocodilians are now conserved, managed and used sustainably in many countries. Furthermore, CITES has introduced traceability measures and controls that exceed those for many other species listed on the Appendices of CITES.

Crocodilians are a classic case of where CITES has demonstrably replaced illegal trade with legal trade, and has provided commercial incentives to landowners and governments to conserve wetlands in the face of competing demands for productive land use.

Unlike the early 1970's, for the last 30 years, international commercial trade, based on sustainable use, is successfully driving conservation efforts for commercially valuable crocodilian species around the world, and benefiting the livelihoods of many rural people who live with them. Indeed, in some countries the crocodile industry invests in conservation efforts for non-commercial species.

In our opinion, Section 653o of the Penal Code did served a valuable purpose when it was implemented, but consideration now needs to be given to the fact that it may no longer relevant to crocodilian conservation, and may actually represents a serious threat to successful conservation programs dependent on trade. AB 719 will ensure trade and conservation actions dependent on trade, will not be disrupted in January 2020. The extension to 2025, and the proposed disclosure, are both precautionary measures, that will provide California with more time to further assess the incentive-driven conservation programs that depend on trade.

The crocodilian production industries have invested heavily in science-based research, and are adopting codes of practice for husbandry and animal welfare that are based on science and rival any other animal production industry. It has been a remarkably insightful evolution, of a new and responsible "wildlife conservation industry".

Yours sincerely,



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