



# Fashion victims

The trade in Australian saltwater crocodile skins

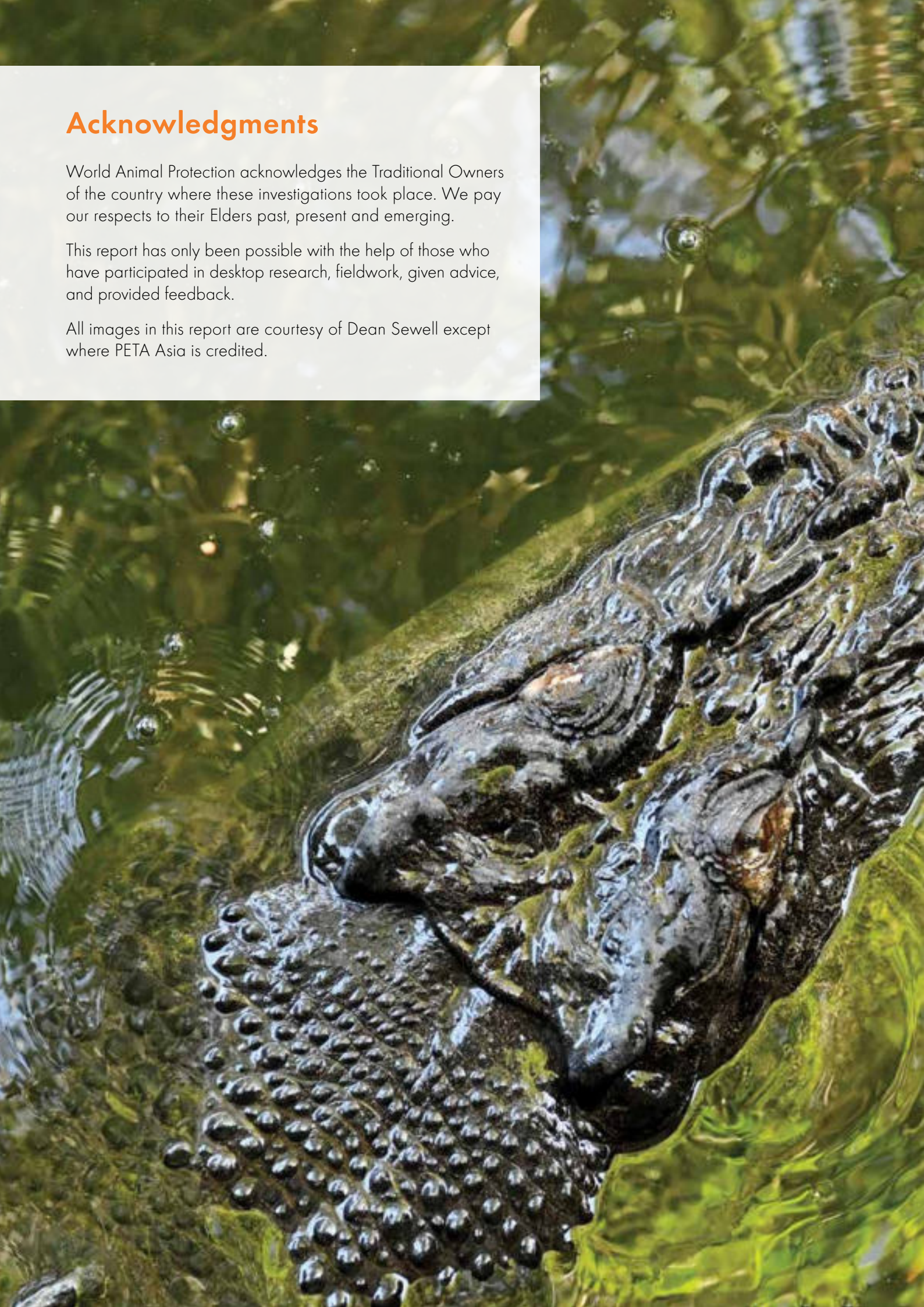


## Acknowledgments

World Animal Protection acknowledges the Traditional Owners of the country where these investigations took place. We pay our respects to their Elders past, present and emerging.

This report has only been possible with the help of those who have participated in desktop research, fieldwork, given advice, and provided feedback.

All images in this report are courtesy of Dean Sewell except where PETA Asia is credited.





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# Executive summary

Each year, thousands of saltwater crocodiles are farmed and killed in Australia for their skins. *Fashion Victims* details the disturbing plan to greatly expand the Northern Territory crocodile industry by French luxury goods company, Hermès. If their planned new farm is completed, it will hold up to 50,000 crocodiles. Each one of these sentient wild animals will have a short life in inadequate conditions before a cruel death. All to be turned into non-essential, luxury handbags, belts and wallets. They are truly victims of fashion.

This report details why the plans for this farm should be stopped, and why the crocodile farming industry must be phased out.

**Animal welfare:** crocodiles are sentient beings who can experience pain and pleasure. To keep them confined in small plastic-lined concrete enclosures for years before cruelly slaughtering them for non-essential fashion items is cruel. The national Code of Practice meant to ensure the humane treatment of crocodiles is, by its own admission, out of date and inadequate, with no public plans for it to be updated. To allow the industry to expand so significantly given the absence of a credible welfare Code would be an appalling abrogation of responsibility by both the Northern Territory and Federal Governments. At the very least, the Code must be updated before new crocodile farms are considered. Moreover, a recent investigation by World Animal Protection of the captive crocodile tourism venues in Darwin, Northern Territory that are linked to the farming industry revealed poor conditions and treatment of the animals justified only according to an outdated, and arguably defunct, conservation approach. If this is how the industry is treating crocodiles in public view, it raises questions about what happens to the crocodiles behind the scenes.

**Species protection:** the crocodile industry claims that commercial crocodile farming is needed to help to protect populations in the wild and notes that the establishment of farming reduced pressure on wild populations at a time when they were vulnerable. Certainly, by the early 1970s the number of wild saltwater crocodiles was severely depleted due to hunting and the efforts to address that are to be applauded. But wild populations are now protected, have largely recovered and the International Union for the Conservation of Nature's Red List categorises them as of Least Concern<sup>1</sup>. Indeed, leading figures in the crocodile industry now say Australian populations have grown to the extent that hunting may need to be reintroduced, even suggesting trophy hunting. Clearly then, ending farming would not be a threat to wild Australian crocodile populations. The captive crocodile farming industry is now solely about profit. As a leading industry figure recently said: "Crocs sort of fall into two categories: those that have a commercial value and those that don't have a commercial value"<sup>1</sup>.

**A declining industry:** international fashion brands are moving away from the use of exotic and reptile skins, including crocodile, as public sentiment begins to turn against the use of animal skins, in the same way that it turned against the use of fur. Even Hermès is developing a new mushroom-based handbag. This trend will only accelerate as animal welfare concerns in the general community grow, casting doubt on the future viability of new crocodile farms. The Northern Territory Government should be planning for the inevitable end of the farmed crocodile industry, not overseeing its expansion.

**Validation of wildlife farming and trade:** the trade and farming of wildlife contributes to the risk of future pandemics. Reptiles specifically pose a zoonotic disease risk in terms of bacteria such as *Salmonella*. Although they do not pose a

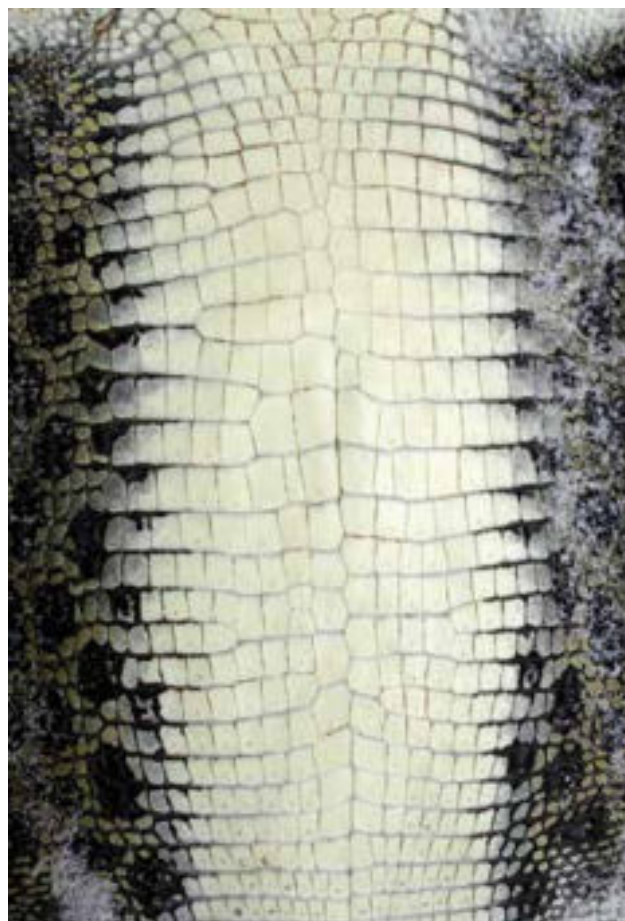
<sup>1</sup> Although it should be noted that the August 2020 Queensland (Nature Conservation (Animals) Regulation 2020 lists them as Vulnerable.

high global pandemic risk like farms involving wild mammals, the farming of any wild animal validates wildlife farming in general. It sends a signal that it is acceptable to commodify wild animals in this way, even for non-essential products like luxury handbags. The Australian Government has been active in advocating for the international community to identify and mitigate the high risk wildlife activities. Wildlife farming is one of them. But this effort could be undermined by simultaneously allowing such a substantial expansion of wild animal farming within Australia. A clear signal from the Australian Government that wildlife farming must be phased out - starting with the rejection of this proposal - would put it in a stronger position to advocate for international policies that are crucial to avoiding future pandemics.

### **Recommendations:**

- » The Federal Minister for the Environment must reject an export permit for the Hermès crocodile farm. At the very least, the Minister must refuse a permit until the 2009 Code of Practice has been updated. The Code is years out of date and in its current form provides no assurance that adequate standards of animal welfare will be upheld on the new farm. Moreover, an independent animal welfare inspector or agency must be given access to the existing farms to audit conditions.
- » The Australian and Northern Territory Governments begin work on a time bound phase-out of the crocodile farming industry that includes measures to ensure alternative livelihood options for individuals currently employed in the industry, particularly indigenous workers. The industry is already in decline; planning must begin now on a just transition for workers and communities who are dependent on it.

- » The fashion industry must accelerate its move away from exotic skins and the use of wild animal products in its goods. There are synthetic and plant-based alternatives that could see the industry continue to provide quality products for its customers without causing animal cruelty.
- » Consumers of fashion products must play their part by refusing to purchase those that use wild animal scales, skins, feather or fur. In doing so, they will prevent millions more animals from suffering short lives and cruel deaths in the name of fashion.



**Image:** A crocodile skin from an Australian farm.

# Introduction

Skins from saltwater crocodiles (*Crocodylus porosus*) are internationally regarded by fashion product manufacturers as the most desirable crocodilian skins. They are generally preferred over freshwater crocodiles or alligators due to their size and degree of ossification, and the small-scale pattern of the skin and 'beauty and pliability of the backstrap'<sup>2</sup>. The belly skin, including skin under the tail and chin, where the skin tends to be more square and flat, is most often used for handbags. The backstrap (horned section on their back) is typically used for belts and hatbands<sup>2</sup>.

Australia provides 60% of the global trade in saltwater crocodile skins, and two thirds are produced in the Northern Territory. In June 2020, it was reported that PRI Farming, a company controlled by the luxury French brand Hermès, had plans to develop a large new crocodile farm in the Northern Territory<sup>3</sup>. On 17 September 2020 a former melon and banana farm in Lambells Lagoon, 56kms southeast of Darwin, was purchased by PRI Farming for AU\$7.25 million for this purpose<sup>4</sup>. Construction has begun and the company plans for the farm to have a capacity of 50,000 saltwater crocodiles. This would make it Australia's biggest crocodile farm and potentially add 37% to the existing number of crocodiles in Northern Territory farms<sup>5</sup>.

The crocodiles would be primarily farmed for their skins to be exported to become luxury products,

particularly handbags. The proposed farm is to have an egg incubator laboratory, a hatchery, grower pens, finishing pens with development costs estimated to be AU\$40 million<sup>3</sup>. Development of the farm has already been approved by the Northern Territory Government. Directors of PRI Farming include established figures in the Northern Territory industry and three French nationals who are also directors of Hermès<sup>5</sup>.

Australia has long been a critical country in the Hermès supply chain. In 2009, a senior executive told Reuters: "It can take three to four crocodiles to make one of our bags so we are now breeding our own crocodiles on our own farms, mainly in Australia<sup>6</sup>". The key markets for Hermès' crocodile products are primarily Europe, Asia and the United States. Crocodile is one of Hermès' most in-demand exotic skins, despite overall demand for exotic skins declining. In addition to crocodile skins, Hermès make handbags out of other exotic leathers including ostrich, lizard and alligator. The great majority of the exotic skins come from farms in the United States, Africa and Australia.

Hermès bags are often made to order, with desktop research showing that they can sell for over US\$300,000 for a rare Birkin bag. In contrast, crocodile handbags locally made and sold in Australia sell for closer to AU\$2,000.



**Image:** Construction of the new crocodile farm at Lambells Lagoon, Northern Territory.

# Australian crocodile industry

Crocodiles have been farmed in Australia since the 1960s with the Northern Territory and Queensland the key jurisdictions for this industry given their natural population of saltwater crocodiles. According to AgriFutures Australia, there were 13 farms in Northern Australia in 2017<sup>7</sup>. Confirming the number and location of all currently operating farms is difficult – company names holding crocodile farm licences are not easily connected to the locations or names of farms. Only farms domestically owned and operating as tourism facilities are easily found online.

For Queensland, the Crocodile Commercial Activity Compliance Plan 2018 identifies nine companies with current crocodile farming licences. In 2020, there were said to be eight crocodile farms in the Northern Territory involved in the skin industry (and three additional farms not involved in the industry)<sup>8</sup>. Comprehensive desktop research by World Animal Protection has only resulted in identifying six of these eight farms to date. The Northern Territory Government website states there are seven crocodile farms in the Territory, from hatcheries to major tourism ventures<sup>9</sup>. There is one known farm in Western Australia which is also a tourism venue. Hence, a conservative estimate of current crocodile farms producing skins in Australia is 18.

Accurate estimates of crocodile numbers at each known farm are also difficult to obtain with most farms hesitant to reveal numbers or suspected to provide underestimated figures. A published estimate for Northern Territory alone is 135,000 crocodiles in farms<sup>8</sup>. In Queensland the Cairns Crocodile Farm provided World Animal Protection with an estimate of 20,000 with other farms suspected to be owned and operated by French brands likely to also have numbers in the many 10,000s. It is a fair estimate that Australia has about 200,000 farmed crocodiles across all farms, a number that likely exceeds wild numbers.

Luxury French brands, Hermès and LVMH Moët Hennessy Louis Vuitton, the parent company of Louis Vuitton, are believed to own or control the majority of crocodile farms in the Northern Territory. In 2013 it was reported that high demand for crocodile skin products had led to these fashion brands buying farms in Queensland and the Northern Territory to guarantee supply<sup>5</sup>. Hermès first purchased a crocodile farm around 10 years ago and since then has bought more farms, with Louis Vuitton also buying its own farms to secure some of the market<sup>5</sup>. This domination of the industry in Australia by luxury French brands is only increasing with the recent purchase of land for the proposed new farm in Lambells Lagoon.

Northern Territory crocodile skin producers have reportedly encouraged high-end fashion producers to purchase local farms to secure their supply chain<sup>3</sup>. In Queensland, Johnstone River Crocodile Farm was bought by HL Australia Proprietary Limited (Louis Vuitton) in late 2011, and Cairns Crocodile Farm is owned by PRI Farming Pty Ltd (Hermès).

In contrast to these luxury French fashion brands, domestic owners have been selling or moving to tourism to make their farms profitable. The history of farm ownership shows three farms having closed in the Northern Territory (with no evidence of current operation). A 2020 report by ABC Rural discusses the struggles of domestically owned farms to make a profit<sup>10</sup>. The long-time owner of the Koorana Crocodile Farm in Queensland is planning to downsize the farm and focus more on tourism. He states *"I've been working in the industry since 1972 and I never, ever thought it would come to this day where we would have over-production in the world market"*<sup>10</sup>.

## An overview of the key stages of the industry are as follows:



### 1. Ranching:

Egg collection from the wild which is subject to a limit ('harvest ceiling'). This is currently 90,000 annually for the Northern Territory<sup>11</sup>. Some eggs are also collected from breeding on the farms.



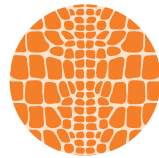
### 5. Slaughter (two to three years of age):

When the crocodiles are large enough – approximately 2m in length or belly skin around the widest part measures 38cms or more when laid flat<sup>2</sup> – they are transported to abattoirs for slaughter. Skins are removed, as well as meat and other products. Raw skins are selected at the farms for their quality.



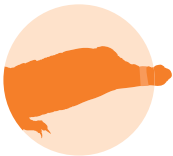
### 2. Incubation and hatching:

Eggs are incubated in controlled conditions until the young hatch.



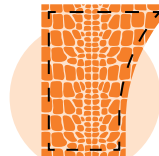
### 6. Skin export:

Skins are tagged and exported according to Convention on International Trade in Endangered Species (CITES) regulations.



### 3. Rearing of juveniles:

Juveniles are raised in communal farm enclosures until approximately two to three years of age.



### 7. Processing of skins:

Skins undergo tanning (converting raw hide into leather), dyeing, grading and product design. It can take the skins of two or three crocodiles to make a large handbag.



### 4. Preparation for slaughter:

Crocodiles are moved into unitised (individual) pens in the months prior to slaughter to allow any skin blemishes to heal and protect skin from damage.



### 8. Retail sales:

Products, such as bags and belts, are ready for sale.



## Lack of data on skin exports

Crocodile skins are graded according to quality. Grade 1 skins have no blemishes or scratches and are most desired by the luxury brands. In order to ensure the quality of skins, crocodile farming practices (i.e. husbandry and slaughter) prioritise methods to protect the skins from scratches and abrasions. This usually involves a life spent in plastic-lined enclosures with the last year of life in small, individual plastic lined pens with extremely limited ability to move. Producing the highest number of Grade 1 skins is said to be critically important to the commercial viability of crocodile farming<sup>12</sup>.

The crocodile farms exist primarily to produce skins for export. The key destination is France, followed by Singapore, Japan and Italy<sup>7</sup>. Tables 1 and 2 show net export data extracted from the CITES Trade Database<sup>13</sup>, for 2013 to 2019 (the last year of reported data currently available at the time of writing). Each country party to CITES must submit annual data on the import and export of CITES-listed animals and products. The accuracy of data for skins depends on the exporter and importer declaring all items and classifying each item in the same way. A hindrance in deciphering the data is that 'skins' and 'skin pieces' are two

different categories. Table 1 shows that the data for Exporter and Importer not only doesn't align but for some years is quite different. For example, France reported 32,192 skin imports from Australia in 2014, but Australia reported only 3,381 skin exports to France (Table 1), and 17,131 skin pieces more than France (Table 2). In a report on the analysis of world trade of crocodile skins<sup>14</sup> it was also suggested that Australia had underreported export of skins.

Currently there is no export data available for Australia for the years 2018 and 2019 as Australia has not submitted an annual export report since 2017. Hence skin export data for these years can only be gleaned from import data. Using the import data as best estimates (an approach also taken by Caldwell<sup>14</sup>) for the three key import countries combined (France, Singapore and Japan), well over 34,000 skins have been exported annually since 2017 (with a spike in 2017 due to a large export to Singapore). In each of 2018 and 2019, the total number of skins exported to France alone exceeded 30,000. An available figure for Northern Territory exports for 2018 and 2019 is over 24,600 crocodile skins<sup>5</sup>.



**Image:** Crocodile skins from an Australian farm.

**Table 1: Export for 'skins' for 2013-2019 (CITES Trade Database)**

Year	France		Singapore		Japan		Totals	
	Exporter (AU) Skins	Importer Skins	Exporter (AU) Skins	Importer Skins	Exporter (AU) Skins	Importer Skins	AUS Export	Importer Data
2013	13,854	27,382	9,428	2,065	608	1,821	23,890	31,268
2014	3,381	32,192	129	4,460	689	1,915	7,580	38,567
2015	27,552	27,402	3,141	3,150	1,403	1,942	32,096	32,494
2016	17,476	19,637	6,572	6,506	2,714	2,714	26,762	28,857
2017	21,161	24,366	10,294	16,767	749	898	32,204	42,031
2018	N/A	30,045	N/A	5,864	N/A	403	N/A	36,312
2019	N/A	31,246	N/A	3,144	N/A	50	N/A	34,440

**Table 2: Export for 'skin pieces' for 2013-2019 (CITES Trade Database)**

Year	Exporter (AU) Skin Pieces	Importer (FR) Skin Pieces	Exporter (AU) Skin Pieces	Importer (SG) Skin Pieces
2013	5,200	N/A	7,862	31,895
2014	17,631	500	3,902	14,940
2015	2,000	2,000	3,662	3,440
2016	N/A	N/A	N/A	1,250
2017	N/A	N/A	N/A	5,250
2018	N/A	N/A	N/A	7,305
2019	N/A	N/A	N/A	1,500

## Economic contribution of crocodile farming industry

The economic contribution of Australian crocodile farming is best reported for the Northern Territory. The Government-commissioned report by Ernst & Young (EY) 'Final Report - Economic Value of the crocodile farming industry in the Northern Territory'<sup>15</sup> discusses both direct and indirect benefits of the industry to the economy. Gross output (market value of goods and services produced) of the farm operations alone for 2014-2015 was estimated at AU\$24.49 million. Other contributions discussed are farm-related tourism and employment for remote communities (i.e. crocodile egg harvesting). Revenue from the Northern Territory's crocodile industry was reported to be \$26.7 million in 2018 and 2019<sup>5</sup>.

In terms of employment, in the 2014-2015 financial year, there were 68 full-time equivalent farm operations workers in the Northern Territory. Farm-related tourism contributed more jobs than the actual farming for skins at 115 workers<sup>15</sup>. Employment for regional and remote communities is through Traditional Owners receiving royalty payments for eggs collected on their lands and locals being employed for the collecting of the eggs. This was estimated at 14 jobs<sup>15</sup>. In contrast, the Northern Territory government estimates that 7,300 persons are employed by the state's tourism industry in total<sup>16</sup>.

# Crocodile welfare

## Biology

The saltwater crocodile is the world's largest living reptile. On average, adult males range from 4.3 to 4.9m in length and weigh 408 to 522kg but can reach up to 6m and weigh over 1,000kg. Females are much smaller, rarely growing to over 3m in length. Males reach sexual maturity around 17 years of age and females around 12 years. Saltwater crocodiles inhabit Australian coastal waters, estuaries, lakes, inland swamps and marshes<sup>17</sup>. This species is the most widely distributed of all crocodilians, ranging from southern India and Sri Lanka, throughout southeast Asia to northern Australia<sup>17</sup>. The species' distribution in Australia ranges from Rockhampton in Queensland throughout coastal Northern Territory to near Broome in Western Australia.

Crocodiles are cold-blooded, relying on the external environment to regulate their body temperature. This involves moving in and out of water, basking on land, shade seeking and mouth gaping. Their behaviour is subtle - although they spend large amounts of time motionless, they are often alert watching their environment. They have highly developed vision, hearing and sense of smell allowing them to probe their surroundings<sup>18</sup>. Crocodiles have dominance hierarchies and males are territorial. Females use elevated, shallow sites for their nests which they defend. They are opportunistic predators that ambush their prey then drown it. Prey includes fish, goannas, birds, cattle, buffalo and wild boar. Saltwater crocodiles are one of the most aggressive species of crocodilian with the least tolerance of conspecifics (i.e. being in close proximity to other crocodiles)<sup>19</sup>.



**Image:** A wild crocodile swims in the Adelaide River, Northern Territory.

## Welfare

Saltwater crocodiles are a wild species and have not been domesticated<sup>20</sup>. In the wild, saltwater crocodiles can live for around 70 years. In captivity, they live for only two to three years in poor conditions before enduring a brutal death. Typically the crocodile is stunned with an electrical stunning wand which renders the crocodile immobile for several minutes. The nape is then cut to allow the animal to bleed out after which the brain is pithed with a short steel rod<sup>7</sup>.

Based on studies into crocodile welfare, it is clear that the physical, behavioural, and emotional needs of crocodiles are more complex than their relatively small brain size and prehistoric features suggest. Their size and territorial behaviour alone indicates that intensive farming in small enclosures cannot possibly meet their need to exhibit natural behaviours. Exploring evidence of reptile sentience, a recent literature review found 37 studies that assumed reptiles to be capable of experiencing stress, anxiety, distress, excitement, fear, frustration, pain, and suffering<sup>21</sup>. Four articles discussed evidence of the capacity of reptiles to feel pleasure, emotion, and anxiety. Renowned zoologist, Jane Goodall, states that reptiles have emotions like those of mammals and birds<sup>22</sup>. Crocodiles also

communicate with one another visually, chemically and acoustically<sup>23</sup>. The literature review cited above went on to discuss reptile sentience in terms of the current treatment of these animals in the commercial trade, stating that the findings have direct implications for how reptiles are treated in captivity, and highlighting that reptile sentience is generally not reflected in legislation for reptiles in captivity across the world.

Experts in reptile behaviour have raised concerns with welfare in crocodile farming operations, with one stating: *“There’s not a lot I approve of in crocodile farming. Their biology and behaviour do not lend themselves to a captive life... the animals may seem peaceful and relaxed. But an animal behaviourist can see that they are stressed”*<sup>20</sup>.

Global PETA investigations have revealed inhumane and disturbing conditions in farms connected to Hermès<sup>24</sup> and Louis Vuitton<sup>20</sup>. This includes alligators farmed in Texas kept in fetid water in dark sheds, and the necks of more than 500 conscious alligators cut as they struggled to escape. On a farm in Zimbabwe, tens of thousands of Nile crocodiles were confined to concrete pits from birth



**Image:** Individual crocodile pens for preparation before slaughter.

to slaughter<sup>24</sup>. Suffering and agonising deaths of crocodiles has also been reported in Vietnam to make luxury leather bags for Louis Vuitton and other brands, including reports of animals being skinned alive<sup>24</sup>. In spite of this evidence, the CEO and chairman of luxury fashion brand Louis Vuitton claims that animals are humanely farmed<sup>25</sup>.

In response to the recent announcement of a new farm by Hermès, the RSPCA Australia noted the many welfare risks posed by crocodile farming in Australia “including injuries from close confinement, small individual penning arrangements, and the impacts of restraint and slaughter methods”<sup>26</sup>.

First-hand evidence of conditions in two crocodile tourism venues in the Northern Territory obtained by World Animal Protection only heightens concerns about welfare practices across the industry. World Animal Protection staff visited Darwin in April 2021 to inspect crocodile tourism venues linked to the farms, and what was observed in publicly accessible areas was disturbing. At one tourism venue that is linked to a farming operation, juvenile crocodiles were observed having their snouts taped shut before being passed around for handling and photographs,

an experience that would have been distressing to the animal. The pens in which crocodiles were kept were small and barren and signage indicated that some may have been there since the 1990s. There was no observable enrichment or stimulation beyond the scheduled taunting of the crocodiles with chicken pieces dangling from a rope so that they would jump up for the amusement of tourists.

The treatment of the crocodiles on public display in tourism venues raises concerns about the welfare of crocodiles on farms beyond public view.

The killing of crocodiles on farms is a confronting and brutal process. Footage of this process obtained by PETA Asia on an Australian crocodile farm shows a crocodile in obvious distress and moving while a rod is being repeatedly jammed into its brain. Despite this, a member of the IUCN-Species Survival Commission (SSC)’s Crocodile Specialist group claimed reptiles can be killed swiftly and humanely with a blow to the head, and that they only continue to move due to their physiology not because they’re still alive<sup>22</sup>.



**Image:** Piercing the brain and spine during slaughter.



**Image:** Electrocution to immobilise the crocodile before slaughter.

## Crocodile Code of Practice

The poor welfare standards reflect the fact that Australian legislation, developed to protect the welfare of crocodiles in captivity, is severely inadequate. Crocodile farming in Australia is required to adhere to the national Code of Practice on the Humane Treatment of Wild and Farmed Crocodiles (2009) (the Code)<sup>27</sup>. The Code details minimum standards for the licenced company for the keeping of crocodiles for commercial purposes. Compliance with the Code is a requirement of Wildlife Trade Management Plans.

By its own admission, the Code is out of date. It states that it will be reviewed in five years' time and 'it is anticipated' that the Code will be reviewed and updated within 10 years<sup>27</sup>. This has not happened and there are no known public plans to do so. Moreover, of the 24 studies and papers that form the evidence base for the Code, 15 are from last century, in some cases the 1970s. Even

the most recent studies are 15 to 16 years old. It is therefore totally inadequate to uphold the minimum standards for best practice farming for crocodile welfare in 2021. The Code acknowledges its own limitations stating it is '... based on current knowledge about crocodile welfare issues and what is currently 'thought to be best practice' in humane handling techniques<sup>27</sup>. It adopts a "precautionary approach in the light of incomplete knowledge.' The Code states gaps in knowledge of physiology, behaviour, pain thresholds of crocodiles and the need for further research to improve humane treatment (i.e. to minimise pain and suffering). It also makes no reference to quality of life for the farmed animals. The Code states that it will need to be modified as new information comes to light: "...research into all aspects of captive husbandry is needed and is progressing rapidly around the world. This may alter current husbandry practices and policy"<sup>27</sup>. That this was written 12 years ago is concerning.



**Image:** Feeding of sub-adult crocodiles in a communal farm enclosure.

## Problems with the Code

Not only is the Code out of date, it is also filled with ambiguous language making compliance and enforcement difficult. The problems presented by 'definitional issues and other inconsistencies and ambiguities' in the Code was recognised in the Northern Territory Crocodile Farming Industry: Strategic Plan 2015-21<sup>28</sup>.

The Plan included an Action to develop '...a Northern Territory industry guide to implementing and interpreting the Code of Practice' to provide 'transparency, accountability, and objective assessment of animal welfare and environmental outcomes'<sup>28</sup>.

The guide would draw on scientific research, technological advances and industry best practice. This was written six years after the Code was adopted and six years before this report. However, there is no public evidence that such a guide has been developed nor that progress has been made towards it.

The Strategic Plan states: "With the move towards more intensive production, the issues of improved animal welfare, handling and nutrition management are key research targets"<sup>28</sup>. However, the newly developed and approved Wildlife Trade Management Plan - Crocodile 2021-2025<sup>11</sup> shows little priority for improving animal welfare in farming practice. One of the guiding principles of the Plan is: 'The treatment of Saltwater Crocodiles must be humane and in accordance with the requirements of animal welfare legislation and relevant codes of practice'<sup>28</sup>. In addition, the Plan 'aims to meet community expectations that crocodile harvesting methods will not breach the Northern Territory Animal Welfare Act 1999 and the Code of Practice'<sup>11</sup>. Far from updating welfare standards, the Plan continues to fall back on the outdated Code. A report titled 'Wildlife Trade Management Plan: 2018-2019 Monitoring Report and Review' gives a review of compliance. This only discusses egg harvesting, with the only mention of animal welfare giving reference to the Code. It reports "There were no reported breaches of the Code during the reporting period"<sup>29</sup>. This seems highly unlikely.

## Voluntary welfare standards

In the course of researching this report, World Animal Protection has found references to various voluntary standards and schemes that allegedly provide higher welfare for farmed crocodiles. None of them appear to be publicly available and it is thus unclear to what extent they improve upon existing, inadequate, legislated standards.

Hermès claims that it adheres to higher voluntary animal welfare standards on its crocodile farms, including in Australia, but there is no publicly available information on what these standards are. Their 2020 Universal Registration Document claims "All the crocodile farming sites the House deals with, including of course those operated by the House, have signed a best animal husbandry practices charter. The charter was introduced in 2009 (an innovation for the profession at the time) and was updated in 2016"<sup>30</sup>. World Animal Protection has been unable to locate this charter on the Hermès website or anywhere else. The Registration Document goes on to claim that 96 per cent of crocodile farms had been externally audited in 2019-2020, but it is not made clear if the audit included welfare considerations and, again, the audits are not publicly available. Hermès also claims to follow the International Crocodilian Farmers Association's (ICFA) international standards that were developed in 2018. The Northern Territory Government's Chief Veterinary Officer was involved in the drafting of these standards and the government claims that they will lead to modifications on crocodile farms, although not specifying that these relate to animal welfare. World Animal Protection has been unable to find the ICFA standards<sup>31</sup>. The tendency toward non-specific assurances around welfare was also evident in response to a written question from PETA to the 4 May 2021 Hermès General Meeting about when Hermès would follow other fashion brands and stop using exotic skins. The response claimed that its Australian operations "entails the development and rigorous application of the highest scientific standards for animal welfare"<sup>32</sup>. The question has to be asked: if the animal welfare charter, audits and standards used by Hermès are so good, then why are they not made public? In the absence of them, it has to be assumed that Hermès relies mainly on the inadequate Code of Practice. Aside from these various voluntary standards, Hermès also claims to adhere to the five freedoms of animal welfare across their operations. Yet it is hard to see how keeping crocodiles in plastic-lined pens with no enrichment is consistent with the fifth freedom: the freedom to express natural behaviour.

# Other industry issues

## Lack of transparency

A recent report on the reptile skin trade 'discusses lack of transparency in the documentation of the trade and its regional and global networks'<sup>22</sup>. In the process of researching for this report World Animal Protection has found this lack of transparency in the industry in Australia. French fashion brands Hermès and Louis Vuitton are believed to own or control most crocodile farms in the Northern Territory. However, neither Hermès nor Louis Vuitton promotes or makes the information easily accessible. This information is only available to the public due to media reports, such as those surrounding the planned new farm in the Northern Territory. There is no mention of the brands' involvement with the farms on their websites, and according to the Australian Broadcasting Corporation, owners of farms bought out by the companies sign non-disclosure agreements barring them from discussing the issue<sup>5</sup>.

If these brands were supporting high animal welfare practices, then why do they go to great lengths to keep this information hidden from consumers? If Hermès was successfully implementing their 'Animal Welfare Policy' in Australia, why are they not sharing the 'best practice' conditions to strengthen their reputation and help reverse the trend of consumers moving away from exotic skins?

## "Sustainable use" and protection of wild populations

The Northern Territory crocodile farming industry uses previous conservation success to legitimise their industry, and claims that the use of exotic skins actually helps wildlife conservation and recovery programs<sup>8</sup>. More, there is evidence that the conservation crisis for saltwater crocodiles is over in the Northern Territory. Saltwater crocodiles were once threatened with extinction in Australia due to commercial hunting. This led to their protection in 1971 (in the Northern Territory) and the recovery of numbers which have now stabilised at levels similar to those before hunting began. The Northern Territory Government implemented what they refer to as an "incentive-driven conservation" strategy which included incentives for commercial activity - crocodile farming and ranching, and tourism<sup>11</sup>. Since then, the crocodile farming industry has grown along with the wild populations<sup>11</sup>. Now, far from being threatened in the wild, recent reports claimed overpopulation is such a threat that there have been calls for wild hunting to be reintroduced<sup>1</sup>.

A well-known figure in the industry and IUCN recently claimed in an interview: "Crocs sort of fall into two categories: those that have a commercial value and those that don't have a commercial value"<sup>1</sup>. This is a disturbing binary that ignores that they have value as a sentient animal and are important in their ecosystems. It certainly doesn't suggest that the welfare of wild crocodiles is the priority.



Image: Assessing the grade of a crocodile skin.



## An industry in decline

In response to growing concerns about animal welfare and acceptance of animal sentience, the use of exotic skins is becoming increasingly controversial. This has resulted in leading fashion brands banning the use of exotic skins and moving to humane alternatives. Brands that have banned use of exotic skins, including crocodile include: Selfridges, Chanel, Victoria Beckham, Mulberry, Karl Lagerfeld, Vivienne Westwood and Tommy Hilfiger. Selfridges, a high-end UK store, were motivated to 'improve supply chain transparency and implement high standards of animal welfare'<sup>22</sup>. Chanel, one of the oldest and most iconic brands, decided to ban the use of exotic skins in 2018 and move towards environmentally-friendly products<sup>33</sup>. Nordstrom plans to ban exotic animal skins by the end of 2021<sup>34</sup>. Yves Saint Laurent has moved to sell crocodile embossed calf skin which provides the look of genuine crocodile skins. In 2020, the Prada Group stopped using fur, with the next natural step ending the use of exotic leathers<sup>35</sup>.

Plant-based and synthetic alternatives to animal skins are only gaining popularity in the luxury category. These include grape, apple and mushroom leathers. Hermès also recognises this movement. For the past three years, the company has invested in technology to produce an alternative made from mushroom-based 'leather'. This alternative reportedly has the strength and durability of cow skin, is sustainable and does not involve animal exploitation.

Given this trend, the Northern Territory Government should accept that the end of crocodile farming for skins is a matter of when, not if, and will likely happen in the near future. They should be planning now for how they will replace the economic contribution and jobs provided by crocodile farming when public opinion and declining demand for its products reaches a critical point. The vulnerability of the Northern Territory crocodile farming industry to changing consumer attitudes is made more acute by the fact that it is dominated by only two brands - Hermès and Louis Vuitton. If only one of them decided to phase out exotic skins, the industry in Australia would be significantly impacted.



Image: A crocodile skin handbag.

The crocodile tourism industry must also respond to changing community attitudes for more natural and non-exploitative experiences with wild animals. There are many opportunities for tourists to experience crocodiles in the wild in the Northern Territory that don't involve animal cruelty but still generate jobs and economic activity. These include going on one of the many river cruises where tourists can see crocodiles in their natural habitat demonstrating natural behaviours. These experiences are much more valuable in helping to educate people about crocodiles, as opposed to seeing them in unnatural conditions being forced to perform. A study of crocodile tourism (including venues in the Northern Territory) found that the perception of crocodiles in captivity differed to those in the wild with those in captivity being perceived as more like pets and less like wild crocodiles<sup>36</sup>. Given the global trend away from captive wild animal experiences in favour of seeing animals in their natural habitat, growing this sector of the crocodile tourism industry should be the Northern Territory Government's priority.

## Validation of wildlife farming and trade

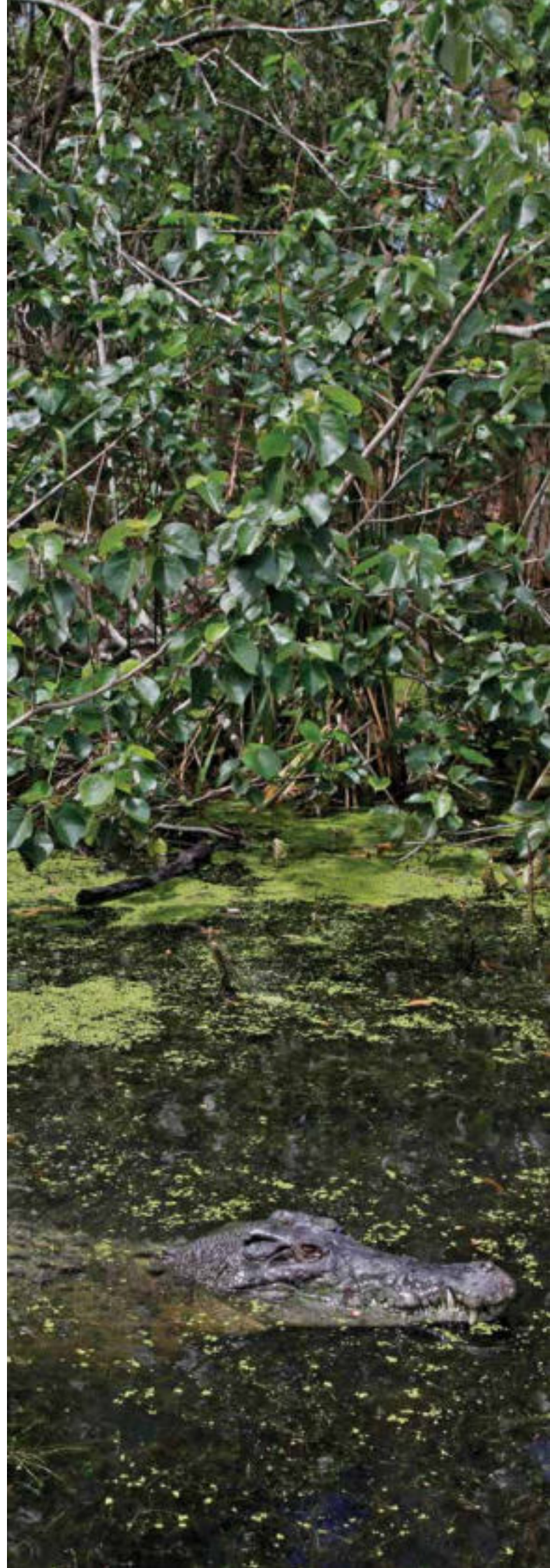
The trade of wildlife and wildlife products sourced from the wild or farmed animals is a source of misery and suffering for millions of animals each year. The horrors of the wildlife trade should be reason enough to ban it. Yet the COVID-19 disaster demonstrates that the trade is not just an animal welfare catastrophe, it is a global health risk. This current pandemic, and previous ones, can be traced back to the misuse and abuse of wild animals.

The Australian Government has been among the strongest voices calling for action to prevent future zoonotic pandemics such as COVID-19. In particular, they have been vocal about the need to address practices and interactions between people and animals that pose the highest risk of zoonotic spillover. Wildlife farming of certain species is an activity that is considered high-risk and has been identified as playing a part in the current coronavirus.

Every year, millions of wild animals and wild animal products are captured from the wild or bred in captivity, then traded for a variety of uses: medicine, food, pets, entertainment, and fashion items. This trade is unspeakably cruel, but also dangerous to us. 70 per cent of zoonotic emerging infectious diseases that can be passed between animals and humans are thought to come from wild animals. They are also responsible for past disease outbreaks like Zika, Ebola, AIDS, SARS and MERS. And, of course, COVID-19, which has a wild animal origin.

Reptiles specifically pose a zoonotic disease risk in terms of bacteria such as Salmonella. Although they do not pose a high global pandemic risk like farms involving wild mammals, the farming of any wild animal validates wildlife farming in general.

By allowing the farming of crocodiles to not only continue but expand, the Australian Government undercuts its own efforts to argue for international action against the farming and trade of wild species that do pose an infectious zoonotic disease risk. On both animal welfare and health grounds, the only real solution is to end the trade in wildlife and wild animal products. A good starting point is the trade in wildlife products for non-essential luxury items such as handbags.



# Conclusion

The huge new crocodile farm proposed by Hermès must not go ahead. This proposed expansion of the Northern Territory crocodile industry will condemn thousands more sentient animals to a short, barren life and brutal death, all to produce non-essential products such as handbags. The fact that the Code of Practice for the welfare of these crocodiles is so out of date and inadequate makes it even more inexcusable that this development may proceed. It highlights in no uncertain terms that governments in Australia seem to care more about the profits of luxury French fashion houses than the welfare of Australian animals. In doing so, the Federal Government is also undermining its international efforts to address and mitigate the zoonotic pandemic risk posed by high-risk activities such as wildlife farming and trade.

Changing public awareness of animal sentience means that the use of crocodile skins for handbags will inevitably fall out of favour, as did other grotesque practices such as the use of fox and mink fur for coats and gloves. The Northern Territory Government

should be planning now for this reality and helping to transition employees and communities dependent on crocodile farming to alternative industries and incomes. In particular, the popular and sustainable wild crocodile tourism industry should be supported and expanded so that people can see these amazing creatures where they belong – in the wild.

The end of the cruel crocodile farming industry in the Northern Territory poses no threat to wild populations, despite the self-interested claims of farming industry supporters. Wild crocodile numbers have recovered and adequate legislative protections exist to ensure they will remain healthy.

Ultimately, the global community must end the wildlife trade and the commodification of wild animals. This is essential not only to end the suffering of millions of animals every year, but also because human health and wellbeing is intrinsically linked to the health of animals and the natural world. Wild animals are not pets, medicines, entertainers nor handbags. They are sentient beings who deserve to live in the wild.

# Recommendations

- » The Federal Minister for the Environment must reject an export permit for the Hermès crocodile farm. At the very least, the Minister must refuse a permit until the 2009 Code of Practice has been updated. The Code is years out of date and in its current form provides no assurance that adequate standards of animal welfare will be upheld on the new farm. Moreover, an independent animal welfare inspector or agency must be given access to the existing farms to audit conditions.
- » The Australian and Northern Territory Governments begin work on a time bound phase-out of the crocodile farming industry that includes measures to ensure alternative livelihood options for individuals currently employed in the industry, particularly indigenous workers. The industry is already in decline; planning must begin now on a just transition for workers and communities who are dependent on it.
- » The fashion industry must accelerate its move away from exotic skins and the use of wild animal products in its goods. There are synthetic and plant-based alternatives that could see the industry continue to provide quality products for its customers without causing animal cruelty.
- » Consumers of fashion products must play their part by refusing to purchase those that use wild animal scales, skins, feather or fur. In doing so, they will prevent millions more animals from suffering short lives and cruel deaths in the name of fashion.

# Appendix

## Legislation governing the crocodile skin industry

### International – CITES

Australia is a Party to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). This is an agreement between governments that aims to ensure that the international trade in wildlife does not threaten wild populations of plants and animals. Australian saltwater crocodiles, once threatened with extinction, are now currently classified as 'Lower risk, least concern' (IUCN, 2009). However, they are listed as a protected species under Appendix II. 'Appendix II lists species that are not necessarily now threatened with extinction but that may become so unless trade is closely controlled. International trade in specimens of these species is authorised by the granting of an export permit. Permits are granted if the relevant authorities are satisfied that trade will not be detrimental to the survival of the species in the wild.' (CITES website)

### National

CITES-listed species fall under the Australian Government's Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The trade of crocodile skins comes under Part 13A of this Act, the purpose of which includes: 'to protect wildlife that may be adversely affected by trade'; and 'to promote the humane treatment of wildlife'. (EPBC Amendment 'Wildlife Protection' Bill 2001, Federal Register of Legislation, 2021).

The export of live crocodiles and commercial shipments of crocodile skins, products or by-products from Australia requires a permit from the Wildlife Trade Regulation Section of the Australian Government Department of Agriculture, Water and the Environment. Permits are granted by the Minister for the Environment (EPBC Act, 1999). Companies that own crocodile farms often apply for 'multiple consignments' permits which allow for a number of shipments within a 6-month period. Skins for export must be tagged in accordance with a tagging system that complies with CITES. Each shipment and the source of the products must be reported to the

Department. All companies trading in a CITES-listed species are required to submit an annual trade report to the Department for CITES.

### Code of Practice

Crocodile farming (management and operations) approved under the EPBC Act 1999 is required to adhere to the national Code of Practice on the Humane Treatment of Wild and Farmed Crocodiles (2009). The Code details minimum standards for the licenced company for the keeping of crocodiles for commercial raising or captive breeding; killing of crocodiles; taking of eggs from the wild and incubating of eggs in controlled conditions. Each State and Territory is responsible for the implementation and enforcement of the Code. Compliance with the Code is a requirement of the Wildlife Trade Management Plans.

### States and Territories

The Legislation and Plans relevant to crocodile farming for the Northern Territory and Queensland are shown in Table 3. In the Northern Territory, crocodile farming falls under 'Livestock' not wildlife. The key legislation that applies includes the Animal Welfare Act (1999) which aims to prevent cruelty. The Northern Territory Crocodile Farming Industry (NTCFI): Strategic Plan 2015-21 discusses expanding the industry, and the current issues in the industry and relevant actions required to achieve the Plan's goals. The recently approved Wildlife Trade Management Plan – Crocodile Farming in the Northern Territory 2021-2025 (2020) details the planned expansion of the industry over the next few years. The Government offers a Crocodile Farm Enterprise Permit (valid for 10 years) which combines three permits for the convenience of farm operators: Permit to Keep Protected Wildlife; and Permit(s) to Import and Export Protected Wildlife.

Queensland has a current Wildlife Trade Management Plan and Wildlife Farming Licences. They also have a Compliance Plan for crocodile farming.

**Table 3: Legislation and Plans for crocodile farming in the Northern Territory and Queensland**

State/Territory	Legislation	Plans	Permits
<p><b>Northern Territory:</b> Department of Environment, Parks &amp; Water Security</p>	<p><i>Animal Welfare Act (1999)</i> (Note: Animal Protection Act 2018 is awaiting approval of the supporting regulations)</p> <p><i>Territory Parks and Wildlife Conservation Act (1976)</i></p> <p>Additional Acts for farming:</p> <ul style="list-style-type: none"> <li>» <i>Environmental Assessment Act</i></li> <li>» <i>Meat Industries Act</i> (re. slaughter in abattoirs)</li> <li>» <i>Livestock Act (Disease surveillance &amp; control)</i></li> </ul>	<p>Northern Territory Crocodile Farming Strategic Plan (2015-21).</p> <p>Wildlife Trade Management Plan - Crocodile Farming in the Northern Territory 2021-2025 (DEPWS, 2020)</p>	<p>Permit to Keep Protected Wildlife</p> <p>Crocodile Farm Enterprise Permit (3 Permits)</p>
<p><b>Queensland:</b> Department of Environment &amp; Heritage Protection</p> <p>Commercial use of animals</p>	<p><i>Environment Protection and Biodiversity Conservation Act 1999</i></p> <p><i>Nature Conservation Act 1992</i></p> <p><i>Animal Care &amp; Protection Act (2001)</i></p>	<p>Wildlife Trade Management Plan - Queensland Crocodile Farming and Crocodile Egg Harvesting 1 November 2018 - 31 October 2023</p> <p>Compliance Plan Wildlife Management: Crocodile commercial activity compliance plan 2018</p> <p>Code of Practice for Crocodile Farming (2010) <i>(Repealed: this remains available for authorities issued prior to 1 September 2017).</i></p>	<p>Wildlife Farming Licence</p>

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