

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Fifty-eighth meeting of the Standing Committee
Geneva (Switzerland), 6-10 July 2009

Interpretation and implementation of the Convention

Trade control and marking

TRADE IN CROCODILIAN SPECIMENS

1. This document has been prepared by the United States of America*, Chair of the Standing Committee Working Group on Trade in Crocodilian Specimens (Working Group).
2. The Working Group was established at the 57th meeting of the Standing Committee (Geneva, July 2008) and comprises 18 Parties, 13 intergovernmental organization, non-governmental organization and industry representatives, a representative of the Animals Committee and the CITES Secretariat.
3. The Working Group's mandate to review the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather products is clearly laid out in Decisions 14.62 and 14.63, adopted at the 14th meeting of the Conference of Parties (CoP14, The Hague, 2007).

14.62 The Standing Committee shall, at its 57th meeting, initiate a process to review the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather goods, including their impact on the effectiveness of the Convention. For that purpose, it shall establish a working group with representatives from exporting and importing countries, the Animals Committee, the Secretariat and other interested parties. The tasks of the working group, which might work electronically, shall be:

- a) to examine the implementation and effectiveness of the universal tagging system;*
 - b) to examine the implementation and effectiveness of issuing CITES documents for small crocodilian leather goods and related trade controls;*
 - c) to consider possible ways and conditions to alleviate the administrative burden related to trade in small crocodilian leather goods and to guarantee the legal origin of the specimens;*
 - d) to report to the Standing Committee on the results of its work at its 58th meeting.*
- 14.63 The Standing Committee shall, at its 58th meeting, consider the report of the working group established under Decision 14.62 and shall submit recommendations, as appropriate, to the Conference of the Parties for consideration at its 15th meeting.*

* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat or the United Nations Environment Programme concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

4. The Chair, using a draft text provided by the Animals Committee representative to the Working Group, developed and circulated to Working Group members on 29 August 2008 a document aimed at providing a starting point for their discussions (see Annex 2).
5. The Working Group thereafter agreed that it would be useful to compile and assess the experiences of CITES Parties in using the uniform tagging system to regulate large numbers of enterprises engaged in crocodilian skin production and related activities (e.g. tanners, skin traders and other industry groups). The Working Group was particularly interested in learning how those CITES Parties developed procedures to streamline and facilitate compliance with the provisions in Resolution Conf. 11.12. It accordingly agreed to develop a questionnaire to collect this information. The WG also agreed to develop a second questionnaire targeting CITES Parties with significant imports, exports, or re-exports of small crocodilian leather goods to gather information about the implementation and effectiveness of means used to regulate CITES trade in small crocodilian leather goods and possible ways and conditions for Parties to alleviate the administrative burden associated with such trade.
6. Prior to developing and distributing these two questionnaires, the Working Group agreed that it would be useful to try to reach agreement on a definition of the term "small crocodilian leather good." The Animals Committee representative to the Working Group, working with Working Group participants from France and Switzerland, prepared a paper laying out the issues surrounding the trade in small crocodilian leather products, the reasons why the issue was raised at CoP14, and some possible definitions for the term "small leather product" (see Annex 3). This document was disseminated to the Working Group on 20 October 2008. After some discussion which reflected a diversity of opinions on this subject, it was clear that no consensus would be reached on a definition of "small leather product." Although the Working Group agreed on most elements of the definition, there was no agreement on a particular size limitation for products that were not specifically listed in the proposed definition. As a result and for the sole purpose of moving forward on its mandate, the Working Group agreed to use a definition of "small crocodilian leather good (product)" based largely on the *Guidelines for the preparation and submission of CITES annual reports*, as follows:

Small Crocodilian Leather Product: small manufactured products of crocodilian leather – e.g. belts, braces, bicycle saddles, cheque book or credit card holders, earrings, handbags, key fobs, notebooks, purses, shoes, tobacco pouches, wallets, watch straps, or any other manufactured product of comparable size.

7. The Working Group developed two questionnaires in English, French and Spanish for distribution to key stakeholders. One questionnaire focused on the implementation and effectiveness of Resolution Conf. 11.12 *Universal tagging system for the identification of crocodilian skins*, while the other dealt with the issuance of CITES documents for small crocodilian leather goods. The Chair is particularly grateful to participants from Argentina, Bolivia, France, Germany, and Switzerland for their assistance in developing and/or translating the questionnaires.
8. Based on a review of CITES trade data and feedback from Working Group members, the Chair proposed distributing the two questionnaires to major crocodilian skin importing and exporting countries, including: Bolivia, China, Colombia, France, Germany, Italy, Japan, Mexico, the Republic of Korea, Mauritius, Singapore, Switzerland, Thailand, the United States of America, Zambia, and Zimbabwe. Other suggested recipients included Working Group members, trade and industry representatives, and registered tag manufacturers. The questionnaires were distributed in February 2009 to approximately 40 Parties, industry representatives, and intergovernmental and non-governmental organizations.
9. The Chair compiled and distributed to the Working Group summaries of all questionnaire responses that were received (Annexes 4 and 5). A total of fifteen responses were received (Bolivia, Bulgaria, Colombia, France, Germany, Malaysia, Mexico, Singapore, Switzerland, Thailand, the United States of America, and Zambia, Fundacion Amigos De La Naturaleza – Bolivia, International Alligator/Crocodile Trade Study, TCIM, and the Japan Leather and Leather Goods Industry) to one or both questionnaires.

10. Key findings derived from the questionnaire on Trade in Small Crocodilian Leather Goods include the following.

General: most respondents have centralized permit issuance; most respondents manage trade data electronically, make those data available only to Management Authority personnel, and use the data for re-export certificate issuance; though an array of small leather products are traded, watchstraps, wallets, and belts were most often reported; several respondents have streamlined or simplified permit or re-export certificate procedures for small crocodilian leather products, primarily focusing on e-permitting or partially completed permits completed by permit recipients; most respondents identified volume as the most significant problem with permit or re-export certificate issuance.

Import: most respondents identified both physical and document inspections as their methods of import control; only two Parties reported more than 50 CITES violations for small crocodilian leather product imports either as personal effects or as commercial shipments in 2007.

Stricter domestic measures: most respondents require, as a stricter domestic measure, issuance of import permits for Appendix-II specimens; three respondents issued over 10 000 import permits each for small crocodilian leather products in 2007; all respondents who require import permits indicate that those permits are issued in less than two weeks, with most issued in less than one week; several respondents indicated that other stricter domestic measures may also apply, including some that limit trade in particular species.

Export/re-export: most respondents reported that export permits have increased over the past 10 years, though only two Parties issued more than 1 000 permits in 2007; nearly all respondents reported an increase in re-export certificates for small crocodilian leather products over the past ten years, with three Parties issuing more than 10 000 certificates in 2007 and three others issuing more than 1 000 certificates; Switzerland reported issuing over 80 000 re-export certificates; nearly all respondents reported that export permits and re-export certificates are issued in less than two weeks, with most issued within a week; most respondents reported that control of exports and re-exports is done via a combination of document and physical inspections.

Other issues: some respondents noted measures that have been or could be taken to reduce current administrative burdens, including elimination of stricter domestic measures, implementing e-permitting or other streamlining of permit issuance processes, delisting certain crocodilian species, and recognizing the personal effects exemption for up to four crocodilian specimens per person [see Resolution Conf. 13.7 (Rev. CoP14)].

11. Key findings derived from the questionnaire on Implementation and Effectiveness of the Universal Tagging System for the Identification of Crocodilian Skins include the following.

General: nearly all respondents indicated that the Management Authority oversees implementation of Resolution Conf. 11.12; most respondents indicated that they implement Resolution Conf. 11.12; all respondents with crocodilian exports reported that they require individual crocodilian skins and flanks be individually tagged and that chalecos have two tags, though most indicated that chaleco tags have different numbers; most respondents supported changing the chaleco requirement to only one tag.

Tag requirements: all or nearly all respondents reported the use of non-reusable tags with ISO two-letter code for country of origin, unique serial identification numbers, standard species code, and permanent alpha-numeric stamping; all respondents who use tags indicate their tags to be self-locking and designed to prevent reuse; most reported their tags to be resistant to heat and mechanical and chemical processing; only one respondent indicated use of bar codes or other innovative marking technologies; several respondents indicated that they do not precisely follow the information sequence; most respondents reported no production of hybrids and, therefore, do not use the hybrid designation on their tags; few respondents reported use of transparent, sealed containers clearly marked with a non-reusable tag.

Trade control: some, but not all, Parties require registration or licensing of producers, tanners, importers and exporters; most respondents reported implementing an administrative system to match imports and re-exports, ensuring that skins and flanks are re-exported with original tags intact unless further processed; most respondents indicated that, in cases where the original tag is lost or removed, a re-export tag meeting all requirements of the resolution is used; most respondents indicated that unused tags are destroyed;

Implementation of Res. Conf. 11.12, Annex 2: nearly all respondents interpret “year of production” as calendar year; only two respondents report tag order details to the Secretariat; no respondent reported requesting that the Secretariat purchase and distribute tags on their behalf; most respondents include tag information on permits and certificates and report to the Secretariat upon request; few respondents reported providing sample tags to the Secretariat for containers of crocodilian parts;

Effectiveness of the Universal Tagging System: several respondents reported using small numbers of tags annually, though four respondents reported 20 001 – 50 000 tags, one reported 100 001 – 500 000, and two reported using over 500 000 tags; costs of purchasing tags and administering the tagging program were either not reported or were not significant for most respondents, though a few reported total costs exceeding US\$75 000 annually; some, but not all, respondents reported cost recovery for the tagging program; all respondents reported that the Universal Tagging System is either very necessary or somewhat necessary for the effective control of trade in crocodilian skins; though most respondents saw no need to amend Resolution Conf. 11.12, some respondents thought there were elements that are not necessary; most respondents reported no cases of fraud or illegal activity associated with the Universal Tagging System, though a few instances of past abuse were noted; no respondent reported more than 25 commercial shipments with CITES violations in 2007, with most respondents reporting 0-10 cases.

Other issues: individual respondents noted a desire to incorporate bar-coding on tags, a need to review CITES Notification to the Parties 2004/063 of 1 September 2004, and concerns about large-scale use of replacement tags. Also, several participants noted concerns about certain tags being susceptible to manipulation, reuse, and potential fraud, suggesting that the Secretariat should contact tag manufacturers to address this issue. The Secretariat reported that it wrote to all tag manufacturers in 2006, when this concern was last brought to their attention. The Secretariat asked all tag manufacturers to confirm that their tags were consistent with the requirements of Resolution Conf. 11.12 – and they all provided such confirmation.

Recommendations

12. Based on the questionnaire results and the Working Group’s efforts since SC57, the Working Group would like to provide a number of recommendations for the Standing Committee to consider and possibly submit to the Conference of the Parties at its 15th meeting. Regarding the implementation and effectiveness of the universal tagging system, the Working Group recommends the revision of Resolution Conf. 11.12 as provided in Annex 1.
13. Regarding possible ways and conditions to alleviate the administrative burden related to trade in small crocodilian leather goods and to guarantee the legal origin of the specimens, the Working Group recommends that Resolution Conf. 12.3 (Rev. CoP14), Part IX, be revised as provided in Annex 1 by inserting the following new subparagraphs:

“d. for small crocodilian leather products, Parties consider measures to alleviate the administrative burdens associated with this trade through simplified procedures to issue permits and certificates as provided in Part XII of this Resolution;

e. for small crocodilian leather products, Parties that require import permits as a stricter domestic measure should review these requirements in order to determine whether they are effective in achieving the objectives of the Convention to ensure that trade in wild fauna and flora species is not detrimental to their survival;”

14. It should be noted that, although there was debate and disagreement on several fine points related to the universal tagging system and CITES regulation of trade in small crocodilian leather products, there was widespread support for the continued use of a tagging system and CITES regulation of trade in other crocodilian leather products as a means of ensuring a legal and sustainable trade in crocodilian skins and leather products.

NB: Text to be deleted is ~~crossed-out~~. Proposed new text is underlined.

Conf. 11.12*

Universal tagging system for the identification of crocodilian skins

AWARE that all living crocodilian species are listed in Appendix I or II, but concerned that several crocodilian species may be subject to some levels of illegal trade;

RECOGNIZING that certain populations of crocodilians may be transferred from Appendix I to Appendix II subject to specified annual export quotas and that these export quotas are to ensure that the annual take from these populations is not detrimental to their survival;

RECOGNIZING that illegal trade ~~has in the past threatened~~ threatens the survival of certain populations of crocodilians and has undermined the efforts of producer countries to manage their crocodilian resources on a sustainable basis;

[Comment: illegal trade remains a concern for certain populations. Therefore, present tense language is more appropriate here.]

RECALLING that Article VI, paragraph 7, of the Convention provides that specimens of species listed in the Appendices may be marked to assist in identifying them;

CONSIDERING that the tagging of all crocodilian skins in international trade ~~would be~~ has been and still is a fundamental step towards the effective regulation of international trade in crocodilians and that Resolutions Conf. 6.17 and Conf. 9.22 to this effect were adopted by the Conference of the Parties at its sixth and ninth meetings (Ottawa, 1987; Fort Lauderdale, 1994);

~~NOTING, however, that strategies for the secure marking of similar species should take into consideration systems currently in place as well as the requirements of legitimate processing industries and that the system established at the ninth meeting of the Conference of the Parties was found to require improvement;~~

[Comment: With the development of the tagging system and its implementation since the 8th Meeting of the Conference of the Parties, and its further improvements since initial adoption, this paragraph has become redundant and should be deleted.]

NOTING the existence of a register of manufacturers able to produce tags for the marking of crocodilian skins, established and maintained by the Secretariat;

~~RECOGNIZING that any requirement for a marking system that involves the individual identification and documentation of huge numbers of specimens is likely to result in increased errors in documentation;~~

[Comment: Deletion of this paragraph is recommended because it is contradictory to the objectives of the resolution, and has largely been disproven by the ongoing, successful use of the universal tagging system.]

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

RECOMMENDS:

- a) the maintenance of a universal tagging system for the identification of raw, tanned, and/or finished crocodilian skins by the general application of non-reusable tags to all crocodilian skins entering international trade from the countries of origin;
- b) that crocodilian skins, and flanks, and chalecos be individually tagged ~~and that chalecos have attached a tag to each side (flank)~~ before export;

* Corrected by the Secretariat following the 13th and 14th meetings of the Conference of the Parties.

[Comment: questionnaire results indicated that there was support for eliminating the requirement that chalecos have tags on each side. There appears to be little illegal activity associated with the chaleco and flank trade, and reducing the tagging requirement for chalecos to a single tag would alleviate some administrative burden associated with this trade.]

- c) that the non-reusable tags include, as a minimum: the ISO two-letter code for the country of origin; a unique serial identification number; a standard species code (as provided in Annex 1); and, where appropriate, the year of skin production or harvest, in accordance with the provisions of Resolution Conf. 11.16 (Rev. CoP14)¹, adopted by the Conference of the Parties at its 11th meeting (Gigiri, 2000) and amended at its 14th meeting (The Hague, 2007); and further, that such tags have as a minimum the following characteristics: a tamper-resistant, self-locking mechanism, heat resistance, inertia to chemical and mechanical processing, and alphanumeric information, which may include bar-coding, applied by permanent stamping;

[Comment: there was some concern about clarifying that “year of production or harvest” refers to the year in which the skin is produced. Also, some working group members raised concerns that some tags can be manipulated and re-used for fraudulent purposes. Lastly, working group members expressed interest in adding technology such as bar-coding to tags in an effort to facilitate streamlined use of tags.]

- d) that the year of skin production or harvest and serial number be separated with a hyphen (-) where the information on tags appears in the sequence: country of origin, year of skin production or harvest, serial number, species code;

[Comment: see comment for paragraph c) above.]

- e) that for the labelling of skins derived from crocodilian hybrids, the designation HYB or, where the parentage is known, the two three-letter codes for the parents, separated by the character ‘x’ (e.g. PORxSIA where the hybrid is a cross between *Crocodylus porosus* and *Crocodylus siamensis*), be used instead of the standard species codes in Annex 1 of this Resolution;
- f) that tails, throats, feet, backstrips, and other parts be exported in transparent, sealed containers clearly marked with a non-reusable tag or label together with a description of the content and total weight, and all the information required for tags for individual skins, flanks and chalecos, as outlined in paragraphs c), d) and e);

[Comment: some flexibility in how transparent, sealed containers are marked may be desirable.]

- g) that Parties establish, where legally possible, a system of registration or licensing, or both, for producers, tanners, importers and exporters of crocodilian skins;
- h) that all countries permitting re-export of raw, tanned, and/or finished crocodilian skins implement an administrative system for the effective matching of imports and re-exports and, further, ensure that skins and flanks are re-exported with the original tags intact unless the pieces originally imported have been further processed and cut into smaller pieces;
- i) that, where the original tags have been lost, damaged, or removed from raw, tanned, and/or finished skins, and flanks and chalecos, the country of re-export should tag ~~each~~ such skins, ~~or~~ flanks or chalecos prior to re-export, with a 're-export tag' meeting all the requirements of paragraph c) above except that the country of origin and standard species codes and years of skin production and/or harvest will not be required; and further, that the same information as is on these tags should be given on the re-export certificate together with details of the original permit under which the skins were imported;

[Comment: Some questionnaire respondents indicated that re-export tags are used more frequently than just for lost or damaged tags, and widespread use of re-export tags should be curtailed.]

¹ Corrected by the Secretariat following the 14th meeting of the Conference of the Parties: originally referred to Resolution Conf. 11.16.

However, other respondents provided information supporting use of re-export tags because of normal business practices, including to minimize damage to skins during tanning and finishing processes. Because there was no agreement on this issue, no substantive amendments have been recommended. Also, see comments for paragraphs b) and c) above.]

~~j) that, where a re-export consignment contains untagged skins that pre-date the entry into effect of Resolution Conf. 9.22 (16 February 1995), the Management Authority record this on the re-export certificate;~~

[Comment: Given that it is extremely unlikely that any significant stockpiles of skins that pre-date the universal tagging system are still available, this paragraph can be deleted.]

- k) that Parties accept export permits, re-export certificates or other Convention documents for trade in crocodilian skins and parts thereof only if they contain the information referred to in paragraph c), f), i) or j), as appropriate, and if the related skins and parts thereof are tagged in accordance with the provisions of this Resolution;
- l) that Parties, with the advice of the Secretariat if appropriate, implement a management and tracking system for tags used in trade as outlined in Annex 2 to this Resolution; and
- m) that Management Authorities ensure that tags not affixed to skins, flanks and chalecos in the year specified on the tag are destroyed;

DIRECTS the Secretariat to report deficiencies of the system or specific instances of concern to the Animals Committee and the relevant Parties, as appropriate; and

REPEALS the Resolutions listed hereunder:

- a) Resolution Conf. 6.17 (Ottawa, 1987) - Implementation of the export quota for Nile and saltwater crocodile skins; and
- b) Resolution Conf. 9.22 (Fort Lauderdale, 1994) - Universal tagging system for the identification of crocodilian skins.

Annex 1 **Codes for the identification of crocodilian species**

Species	Code
<i>Alligator mississippiensis</i>	MIS
<i>Alligator sinensis</i>	SIN
<i>Caiman crocodilus apaporiensis</i>	APA
<i>Caiman crocodilus chiapasius</i>	CHI
<i>Caiman crocodilus crocodilus</i>	CRO
<i>Caiman crocodilus fuscus</i>	FUS
<i>Caiman latirostris</i>	LAT
<i>Caiman yacare</i>	YAC
<i>Crocodylus acutus</i>	ACU
<i>Crocodylus cataphractus</i>	CAT
<i>Crocodylus intermedius</i>	INT
<i>Crocodylus johnstoni johnsoni</i>	JOH
<i>Crocodylus moreletti moreletii</i>	MOR
<i>Crocodylus niloticus</i>	NIL
<i>Crocodylus novaeguineae mindorensis</i>	MIN
<i>Crocodylus novaeguineae novaeguineae</i>	NOV
<i>Crocodylus palustris</i>	PAL
<i>Crocodylus porosus</i>	POR
<i>Crocodylus rhombifer</i>	RHO
<i>Crocodylus siamensis</i>	SIA
<i>Gavialis gangeticus</i>	GAV
<i>Melanosuchus niger</i>	NIG
<i>Osteolaemus tetraspis</i>	TET
<i>Paleosuchus palpebrosus</i>	PAP
<i>Paleosuchus trigonatus</i>	TRI
<i>Tomistoma schlegelii</i>	SCH

[Comment: Corrections follow current CITES nomenclature for these species.]

Annex 2 Management and tracking system for tags used in the crocodilian skin trade

1. The CITES Secretariat should establish, maintain, and amend periodically thereafter, a list of approved sources capable of manufacturing tags that meet the minimum requirements as laid down in paragraph c) of this Resolution; and further, the Secretariat should regularly give notice to the Parties of such sources and each Management Authority should obtain tags to mark crocodilian skins only from these approved sources.
2. Any approved tag manufacturer registered by the Secretariat should first agree, in writing, that it will:
 - a) not duplicate any series of tags produced in accordance with this Resolution; and
 - b) sell such tags only to Management Authorities or, in non-party States, to designated government agencies recognized by the Secretariat in accordance with Resolution Conf. 9.5 (Rev. CoP14)², or to bodies approved by these agencies; ~~and~~
 - ~~c) report direct and immediately to the Secretariat each order for tags that is fulfilled.~~

- ~~3. When ordering tags from approved sources, Management Authorities should immediately inform the Secretariat of the details of each tag order.~~

[Comment: There does not appear to be a need to report all tag orders to the Secretariat, either by the tag manufacturer or the Parties receiving tags.]

- ~~4.3.~~ Upon request by a Management Authority, the Secretariat should purchase and distribute tags for crocodilian skins, and should require advance payment ~~recover the full cost~~, except if external funding becomes available for Parties requiring assistance.

[Comment: amendment proposed by the Secretariat.]

- ~~5.4.~~ When issuing export permits or re-export certificates for crocodilian skins, or other specimens referred to in this Resolution, Parties should record the numbers of the tags associated with each document and make this information available to the Secretariat on request.

- ~~6.5.~~ The Management Authorities of the exporting, re-exporting and importing Parties should provide to the Secretariat, when directed by the Standing Committee or agreed to between the range State and the CITES Secretariat, a copy of each export permit, re-export certificate, or other Convention document for crocodilian skins, ~~or flanks~~ or chalecos immediately after issuance or receipt as appropriate.

[Comment: Amendment to ensure consistent usage throughout document.]

- ~~7.6.~~ Parties that require or intend to require the use of tags or labels for containers should send to the Secretariat at least one sample tag or label for reference.

[Comment: See comment for paragraph f) above.]

² Corrected by the Secretariat following the 13th and 14th meetings of the Conference of the parties: formerly referred to Resolution Conf. 9.5, later corrected to Resolution Conf. 9.5 (Rev. CoP13).

Conf. 12.3 (Rev. CoP14)*

Permits and certificates

IX. Regarding permits and certificates for crocodilian specimens

RECOMMENDS that:

- a) when trade in tagged crocodilian skins is authorized, the same information as is on the tags be given on the permit or certificate;
- b) in the case of crocodilian species subject to quotas approved by the Conference of the Parties, no permit or certificate for skins be issued before the skins are tagged in accordance with the requirements of the issuing Management Authority and their sizes are recorded; and
- c) in the event of mismatches of information within a permit or certificate for crocodilian skins, the Management Authority of the importing Party immediately contact its counterpart in the exporting/re-exporting Party to establish whether this was a genuine error arising from the volume of information required by the present Resolution and Resolution Conf. 11.12, and that, if this is the case, every effort be made to avoid penalizing those involved in the transaction;
- d) for small crocodilian leather products, Parties consider measures to alleviate the administrative burdens associated with this trade through simplified procedures to issue permits and certificates as provided indicated in Part paragraph XII of this Resolution;
- e) for small crocodilian leather products, Parties that require import permits as a stricter domestic measure should review these requirements in order to determine whether they are effective in achieving the objectives of the Convention to ensure that trade in wild fauna and flora species is not detrimental to their survival;

Draft Plan of Action for SC57 Working Group on Trade in Crocodilian Specimens
29 August 2008

1. At the 14th meeting (CoP 14, The Hague, 2007), the Conference of the Parties adopted the following decisions directed to the Standing Committee:

14.62 The Standing Committee shall, at its 57th meeting, initiate a process to review the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather goods, including their impact on the effectiveness of the Convention. For that purpose, it shall establish a working group with representatives from exporting and importing countries, the Animals Committee, the Secretariat and other interested parties. The tasks of the working group, which might work electronically, shall be:

- a) to examine the implementation and effectiveness of the universal tagging system;*
- b) to examine the implementation and effectiveness of issuing CITES documents for small crocodilian leather goods and related trade controls;*
- c) to consider possible ways and conditions to alleviate the administrative burden related to trade in small crocodilian leather goods and to guarantee the legal origin of the specimens; and*
- d) to report to the Standing Committee on the results of its work at its 58th meeting.*

14.63 The Standing Committee shall, at its 58th meeting, consider the report of the working group established under Decision 14.62 and shall submit recommendations, as appropriate, to the Conference of the Parties for consideration at its 15th meeting.

2. At the 57th meeting of the CITES Standing Committee, a Working Group on Trade in Crocodilian Specimens was established including representatives from Parties, NGOs, IGOs, private sector entities involved in various aspects of crocodilian trade, and a representative selected by the Animals Committee at its 23rd meeting (Mr Dietrich Jelden of Germany). It was decided that the working group should be chaired by the USA and that the business of the working group should be conducted by electronic means.
3. In order to examine the **implementation and effectiveness of the universal tagging system** for the identification of crocodilian skins as outlined in CITES Resolution Conf. 11.12 the following approaches could be considered:

- Assess the experiences of CITES Parties with large crocodilian skin production (USA, Colombia, Zimbabwe, Australia etc.) and private sector entities (tanners, skin traders and other industry groups) with implementation of the tagging system, and how these CITES Parties have developed procedures to streamline and facilitate compliance with the provisions in Resolution Conf. 11.12. Toward this end, the working group could develop a questionnaire to collect this information and standardize the data collection. The questionnaire could focus on problems and issues associated with the implementation of the following paragraphs in the operational part of CITES Resolution Conf. 11.12: c), d), e), f), g), l) and m).

After completion of this assessment and evaluation of the responses, a number of possible changes to the Resolution Conf. 11.12 could be considered. Mr Dietrich Jelden identified the following items for potential consideration:

- Introducing bar-coding and electronic management systems to assess and store data on tags. Here additional consultations with CITES approved tag manufacturers listed in CITES Notification 2004/063 could be warranted (The United States would be happy to share its own experiences and efforts to incorporate bar-coding on alligator tags this year);

- Possible recommendations to amend Resolution Conf. 11.12 pre-ambular paragraph 6 and 8;
 - Possible recommendations to amend Resolution Conf. 11.12 operational paragraph c), d) and e) (information structure and physical characteristics of tags);
 - Possible recommendations to amend Resolution Conf. 11.12 Annex 2 paragraph 3) recommending that CITES Management Authorities provide information to the Secretariat on the details of each tag order;
 - Possible recommendation to conduct an overall review of Resolution Conf. 11.12 to address redundancies.
4. In order to examine the **implementation and effectiveness of issuing CITES documents for small crocodilian leather goods** and related trade controls the following approaches could be taken:
- As a starting point, it would be useful to discuss what is meant by the term 'small leather product' and see if we can agree on a definition. It is unclear, for example, if this is to refer to watchstraps, key-attachments and credit card holders, or whether it would also include money purses, belts, wallets etc.).
 - Assess among those CITES parties that produce and trade in large amounts of small crocodilian leather products how they effectively issue their CITES permits (France, USA, Switzerland, Germany, Italy, Japan etc.). As noted above, a questionnaire could be used to inquire about this information. In addition, such an assessment should also include questions about how these parties conduct and implement trade controls effectively on small crocodile leather products.
5. Finally, *"to consider possible ways and conditions to alleviate the administrative burden related to trade in small crocodilian leather goods and to guarantee the legal origin of the specimens"* the Working Group could consider:
- Introduction of effective electronic permitting systems including electronic application schemes (Switzerland could provide insight on their efforts in this area);
 - use of blanket and already pre-signed CITES permit forms as provided in Resolution Conf. 12.3 (rev. CoP 14) on 'Permits and Certificates' Annex XII on ***'use of simplified procedures to issue permits and certificates.'*** The Working Group may need to consider whether Annex IX of Resolution Conf 12. 3 (rev. CoP 14) ***'Regarding permits and certificates for crocodilian specimens'*** needs to be amended;

Issue Paper on
'Concerns about High Volume Trade in Small Crocodilian Leather Products'
submitted to the

CITES Standing Committee's Working Group on Implementation of CITES Decisions 14.62 & 14.63

Evolution of and trade background to the issue

At the 14th meeting of the Conference of the Parties Germany, on behalf of the European Community Member States submitted a discussion document (CoP14 Doc. 46) on 'TRADE IN SOME CROCODILIAN SPECIMENS'.

The reason why such a document was submitted for discussion at a CoP was that crocodilian leather items are to a large extent manufactured outside of the range states of the species concerned. Hence the vast majority of international trade in such specimens consists of re-exports.

According to the CITES 2004 annual reports, only 3.5% of the worldwide trade in crocodilian leather items which correspond to code LPS [i.e. Leather Product (Small)] as defined in the Guidelines for the preparation and submission of CITES annual reports (see Notification to the Parties No. 2006/030) involved exports, while re-exports constituted 96.5% of the trade. In addition, 85% of exported LPS specimens and 92% of re-exported LPS specimens involving crocodilian leather originate either from captive-breeding or ranching operations (sources C, D or R).

Furthermore, all small crocodilian leather items that are re-exported have been produced from raw or semi-worked skins or skin pieces which had been previously subject to the requirements of the Convention, including CITES Resolution Conf. 11.12 (Universal tagging system for the identification of crocodilian skins).

Given the high percentage of LPS exports derived from sources C, D or R, and the fact that LPS re-exports were previously subject to the tagging requirements, it can be argued that as much as 99.5% of the trade in LPS specimens involving crocodilian leather has no impact on the conservation of the crocodilian species concerned.

The worldwide trade in crocodilian skins is well documented by ongoing research studies such as the International Alligator and Crocodile Trade Study (IACTS) which is regularly undertaken by UNEP-WCMC. Today, this trade is effectively regulated; most of the formerly flourishing illegal skin trade has now been eliminated. In fact, the crocodilian skin and skin product trade is widely recognized as one of the great success stories of CITES. Therefore, issuing CITES documents and controlling the trade in crocodilian leather products, in particular the small ones, has no real benefit for the conservation of the species concerned.

Despite this reality, countries that manufacture and trade in these leather products are obliged to issue tens of thousands of re-export certificates for such specimens each year. Despite the fact that CITES control of trade in personal and household effects including up to 4 specimens of crocodilian species (Res. Conf. 13.7 (rev. CoP 14)) has been exempted from permitting requirements for several years, the quantity of CITES documents have continually increased. One reason for this increase is that some stages of the manufacturing process are carried out in third countries, which implies several successive re-exports and re-imports for the same specimens.

The quantity of CITES documents issued by some Parties can amount to tens of thousands or as many as a hundred thousand documents annually, and imposes a tremendous administrative burden both on Management and Customs Authorities, whose financial and human resources are often limited. In addition, the obligation to handle and manage these documents and the data derived from them make the transactions unnecessarily more expensive and time consuming.

In order to ensure that the limited human and financial resources that are available are more wisely allocated in the future to address the real burning conservation issues within the CITES arena, all efforts

should be undertaken within the available legal scope of the Convention to alleviate any unnecessary bureaucratic controls associated with international trade in small crocodilian leather products.

As the problem described above is mainly associated with trade in small crocodilian leather products, the focus of the work of the SC's working group should therefore focus on these commodities. However a definition of the term '*small crocodilian leather product*' that could be readily implemented by border officials is warranted. The **ANNEX** to this document provides several options for such a definition. The subgroup responsible for preparing this paper is of the opinion that 'Option No 3' seems to offer the most practical way forward.

ANNEX

Definition of the Term 'Small Crocodilian Leather Product'

1. Explicit Definition

Small leather products are manufactured goods made of crocodilian leather. Specified by name, these products would be limited to belts, braces, bicycle saddles, cheque book or credit card holders, earrings, handbags, key fobs, notebooks, purses, shoes, tobacco pouches, wallets and watch-straps.

Advantage:

- Uses the definition for (LPS) already embedded in the provisions of CITES Notification to the Parties No.2006/030

Disadvantage:

- The size/surface of those listed products is unknown
- Inflexible list not readily open for new products or developments

2. Relative Definition

Small leather products are manufactured goods made of leather not exceeding the surface of 100/500/1000 or 2000 cm²

Advantage:

- The product doesn't have to fit in a specific type of manufactured specimen
- Open for new products and unrestricted in time

Disadvantage:

- Surface restriction (see Attachment I and II): Where to put the limit?

100cm² includes watchstraps, earrings, key fobs
500cm² adds purses, some cheque books or credit card holders, some belts
1000cm² adds braces, handbags, notebooks, shoes, wallets
2000cm² adds large handbags

- Not always easy to measure

3. Combination of explicit and relative definition

- *Small leather products are manufactured goods made of leather, such as: belts, braces, bicycle saddles, cheque book or credit card holders, earrings, handbags, key fobs, notebooks, purses, shoes, tobacco pouches, wallets and watch-straps or any other manufactured product not exceeding the size of 100/500/1000/2000 cm². [Note: the list of products would need to be amended depending on the agreed maximum size limit.]*
- *Ornaments or applications of crocodilian leather on larger items when these ornaments/applications do not exceed the size of 100/ 500/1000 or 2000 cm²*

Advantage :

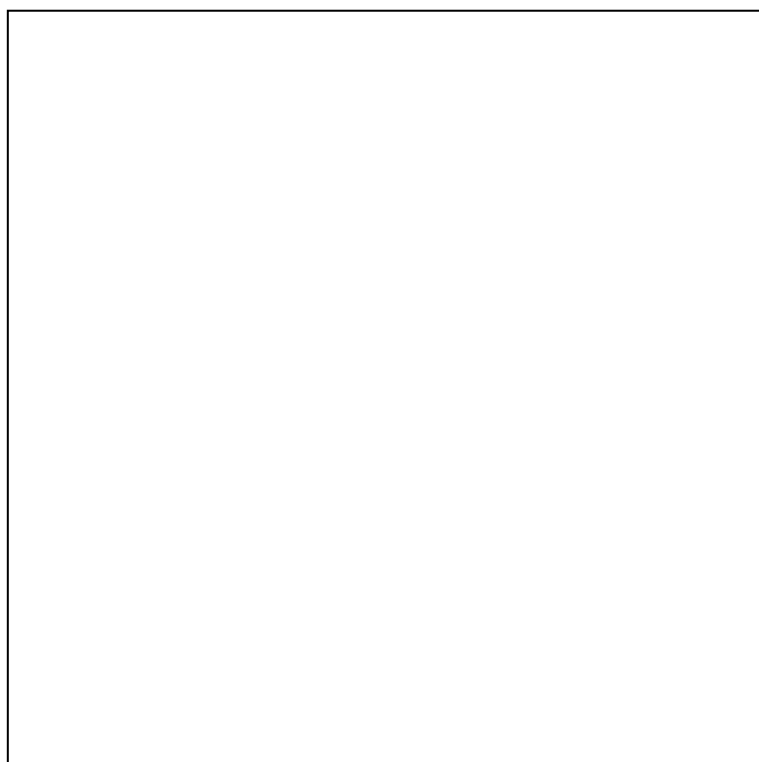
- The combination of explicit/relative definition covers the relevant range of products and provides enough flexibility for unknown kind of products with a limitation in surface.

Attachment I: Demonstration of products and their average surface

Product	Average Size*			Upper limit Size* (average)		
	Length (cm)	Breadth (cm)	Surface (cm ²)	Length (cm)	Breadth (cm)	Surface (cm ²)
Watch- straps (Gents)	19 (115/75mm)	1.75 (19/18mm)	33.25	23 (135/95mm)	2 (22/18mm)	46
Belts	120	4	480	160	Big differences	
Purses	25	10	250	Big differences		
Braces	190	3.5	665	Big differences		

*estimated

Attchament II: Visualisation of 100cm²





TRADE IN SMALL CROCODILIAN LEATHER GOODS

Questionnaire

1.2. Which agency or agencies serve as the CITES Management Authority in your country?

Bolivia- Ministerio De Medio Ambiente Y Aguas - Viceministerio De Medio Ambiente, Biodiversidad Y Cambios Climaticos - Direccion General De Biodiversidad Y Areas Protegidas - Oficina Administrativa CITES.

Bolivia (Friends of Nature)-La Dirección General de Biodiversidad y Areas Protegidas.

Bulgaria-Ministry of Environment and Water.

Colombia-Ministerio de Ambiente, Vivienda y Desarrollo Territorial - Dirección de Ecosistemas Dra. Bertha Cruz Forero.

France-One National Management Authority (not issuing permits/certificates) : the Water & Biodiversity Department, at the Ministry of Ecology and Sustainable Development

+

30 local Management Authorities issuing permits and certificates :

- 22 "Directions régionales de l'environnement" (DIREN) in metropolitan France

- 4 "Directions régionales de l'environnement" (DIREN) in overseas territories (Guadeloupe, Guyane, Martinique, Réunion)

- 2 "préfectures" (Mayotte, Saint Pierre et Miquelon).

- 2 "Hauts-Commissariat de la République" (Polynésie française, Nouvelle Calédonie).

Germany-1. Federal Ministry for Environment, Nature Conservation and Nuclear Safety;

2. Federal Agency for Nature Conservation (issuing of CITES permits and certificates).

Japan (Horiuchi Trading Co.)-Ministry of Economy, Trade & Industry (METI).

Malaysia-Ministry of Natural Resources and Environment, Department of Wildlife and National Parks, Agriculture Department, Department of Fishery, Malaysian Timber Industry Board, Sabah Wildlife Department, Sarawak Forestry Department.

Mexico-Secretaría de Medio Ambiente y Recursos Naturales (SEMARNAT), Dirección General de Vida Silvestre, Martín Vargas Prieto (General Director). It is only one agency.

Singapore-Agri-Food & Veterinary Authority of Singapore.

Switzerland-Veterinary Office, CITES Management Authority, Schwarzenburgstrasse 155, CH-3003 Bern.

Thailand-Licence and Fisheries Management, Department of Fisheries.

United States-U.S. Department of the Interior, U.S. Fish and Wildlife Service.

Zambia-Zambia Wildlife Authority.

1.3. Do you have regional or field offices with the ability to issue import, export and re-export permits?

☐ Yes (if yes, please explain) – **France**- Local Management Authorities issue permits and certificates. **Malaysia** - DWNP state department in Penang, Johore and Federal Territory of KL. **United States** - Export permits and re-export certificates can be issued either by the Management Authority or by certain FWS Office of Law Enforcement offices.

☐ No – **Bolivia, Bolivia (Friends of Nature), Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, Zambia**

1.4. Do you have the ability to delegate issuance of permits or certificates to other agencies or semi-official bodies, such as chambers of commerce?

☐ Yes (if yes, please explain) – **Switzerland**- Chambers of commerce are allowed to print and sign certificates and permits after the Veterinary Office had controlled them.

☐ No – **Bolivia, Bolivia (Friends of Nature), Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Thailand, United States, Zambia**

1.5. What agency or agencies perform border controls?

Bolivia-NINGUNA, **Bolivia (Friends of Nature)**-La Aduana Nacional de Bolivia. **Bulgaria**-National Customs Agency. **Colombia**-Corporaciones Autónomas Regionales. **France**-Customs. **Germany**-Customs authorities. **Japan (Horiuchi Trading Co.)**-NR. **Malaysia**-Customs and at some borders DWNP staff is placed permanently. **Mexico**-Procuraduría Federal para la Protección Ambiental (PROFEPA). **Singapore**-Immigration and Checkpoints Authority (ICA), Police Coast Guard (PCG) and AVA. **Switzerland**- CITES inspectors: Products can be imported at any border. After customs clearance, customs inform the CITES control post. The importer has to present his product/animal to the CITES control post within 48 hours, which perform the physical and document controls. **Thailand**-Inspection Officer. **United States**-U.S. Fish and Wildlife Service & U.S. Customs and Border Protection. **Zambia**-Zambia Revenue Authority.

1.6. How do you compile trade data?

☐ Electronically – **Bolivia, Bulgaria, Colombia, Germany, France, Malaysia, Mexico, Singapore, Switzerland, United States, Zambia**

☐ Paper – **Colombia, Japan (Horiuchi Trading Co.), Malaysia, Switzerland, Thailand, Zambia**

☐ Other (if other, please explain)

1.7. By whom is the data entry performed?

☐ By the importer – **Bolivia, France, Singapore, Switzerland, United States**

☐ By the re-/exporter – **Bolivia, France, Singapore, United States**

☐ By the border control agency – **United States**

☐ By the CITES Management Authority – **Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Switzerland, Zambia**

☐ Other (if other, please explain – **Thailand**-border control agencies report to CITES MA

1.8. Who can access the data?

☐ Importer – **Bolivia, Switzerland**

☐ Re-/Exporter – **Bolivia, Switzerland**

☐ Border control agency – **Mexico, United States**

☐ CITES Management Authority – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Switzerland, Thailand, United States, Zambia**

☐ Other (if other, please explain) – **France**-Non personal datas are available for any person/institution asking for. **Germany**-After publication of the annual report the information is available to the general public on the respective section of the website of the Federal Agency for Nature Conservation (www.CITES.BFN.DE). **Switzerland**-Importers and Re-/Exporters can only access the data belonging to them.

1.9. Are stored data used directly for issuing re-export certificates?

☐ Yes – **Bolivia, Bulgaria, Colombia, Germany, Mexico, Singapore, Switzerland, Thailand, United States**

☐ No – because **France**-data entry is performed again; datas concerning the related imports are not always available because these imports may have occurred in another EU Member state. **Japan (Horiuchi Trading Co.)**-No because as far as I know Japanese M.A. normally makes a decision by various information which is attached to the application for re-export certificate by the applicant. Regarding the backing up data/information, I do not know whether or not M.A. has other source. **Malaysia. Zambia**-because no re-export.

1.10. What are the primary types of small crocodilian leather products imported/exported in your country?

Bolivia-NR, Bolivia (Friends of Nature)-Los principales productos exportados son: zapatos, cinturones y billeteras. **Bulgaria**-watchstraps. **Colombia**-Llaveros, bolsos, billeteras, correas, maletines, joyeros, zapatos, chaquetas, brazaletes, cintas para sombreros, sets para elaboración de artículos. **France**-raw or tanned skins. **Germany**-watch straps, handbags, hatbands. **Japan (Horiuchi Trading Co.)**-Watchstraps, wallets, pochets, belts, etc. **Malaysia**-bag, wallets, belts, watch straps. **Mexico**-boots, belts, watch straps. **Singapore**- Watchstraps, handbags, wallets, purses, belts and key holders. **Switzerland**-watchstraps. **Thailand**- handbag, wallets, belts purses, shoes, skull, credit card holders key fobs, shoes. **United States**-all but bike saddles, braces, earrings, tobacco pouches. **Zambia**-raw skins only.

1.11. For which crocodilian specimens are re-export certificates mainly issued (i.e. watchstraps, handbags, etc.)?

Bolivia-CINTURONES, CORREAS DE RELOJ, CARTERAS, ZAPATOS, BILLETERAS, PORTA LABIAL, PORTA ENCENDEDOR. **Bulgaria**-Alligator mississippiensis, Crocodylus niloticus. **Colombia**-Para todos los propductos con fines comerciales en su mayoría bolsos. **France**-watchstraps, bags. **Germany**- Alligator mississippiensis, Caiman crocodilus crocodilus, Caiman crocodilus fuscus, Crocodilus niloticus, Crocodilus porosus. **Japan (Horiuchi Trading Co.)**-Finished leathers, handbags, watchstraps, wallets and etc. **Malaysia**- Crocodylus porosus, Alligator mississippiensis, Crocodilus niloticus, Caiman crocodilus fuscus. **Mexico**-boots. **Singapore**- Watchstraps, handbags, wallets, purses, belts and key holders. **Switzerland**-Alligator mississippiensis, Caiman spp, Crocodylus niloticus. **Thailand**-handbags, wallets, belt, watch straps. **United States**-all. **Zambia**-N/A.

1.12. Have you taken any steps to streamline or simplify permit or re-export certificate issuance for small crocodilian leather products?

☐ Yes (if yes, please explain)

Bolivia-SE CUENTA CON LA ESTANDARIZACIÓN PARA PRODUCTOS CON VALOR AGREGADO - GUIA DE PRECINTADO PARA EL CONTROL. **France**-Simplified procedure with regard to export or re-export of dead specimens has been put in place for agreed companies that have committed themselves to fulfill the conditions. **Germany**-Online platform for internet based applications for electronically processed CITES permits (www.cites-online.de). **Mexico**-Yes, from hand made registers to electronically data base and registers. **Singapore**-AVA uses the pre-signed CITES permit system to issue permits for retail sale and export by tourists of crocodilian LPS such as wallets and handbags. Each permit lists the scientific name and CITES permit number of the country of origin and date of issue. The permit would include an inventory of commonly traded LPS with empty spaces for the quantity, for which the retailer is authorized to fill in. The retailer is also required to complete the details of the permittee and consignee upon making a sale. The retailer will send a copy of the CITES permit back to AVA for updating of our records on quantities exported/re-exported. A specimen copy of a pre-signed CITES permit is enclosed for reference. **Switzerland**-e-CITES: It is an internet-based system, comparable to a bank account, which gives the importer the possibility to apply for permits/ certificates electronically. The importers enter their import data into their "bank-account". The CITES Management Authority controls the data based on the original foreign CITES documents and only after this control can the re-exporter apply for re-export permits. The CITES MA can reject applications or authorize them. Printing is either performed in the MA or at the wish of the re-exporter at chambers of commerce attached to that system. It accelerates the process of permits'/certificates' issuance in a significant way (issuance in less than 5 hours). **Thailand**-

Inspect the ground requesting document identify scientific name check Regulation type a permit signature. **United States**-The U.S. Management Authority has incorporated elements of Resolution Conf. 12.3 (Rev. CoP 14), XII ("Regarding the use of simplified procedures to issue permits and certificates") to establish a procedure where applicants, such as leather good re-exporters, can receive a number of partially completed certificates. The re-exporter is then responsible for inserting specific information, such as the quantity, country of origin, and export permit number. A USFWS Wildlife Inspector then verifies this information at the time of export. This system has greatly reduced the application processing time for many re-exporters.

☐ No – **Bulgaria, Colombia, Japan (Horiuchi Trading Co.), Malaysia, Zambia**

1.13. What are the most significant problems with permit or re-export certificate issuance for small crocodilian leather products?

☐ Volume – **Bolivia, Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Switzerland, Thailand, United States**

☐ Complexity – **Colombia, Malaysia**

☐ Timeliness – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico**

☐ Other (if other, please explain) – **Japan (Horiuchi Trading Co.)**- I can imagine that volume and timeliness should be big burdens to the exporting country's M.A. **United States**-increasing number of shipments of small quantity. **Zambia**-none.

2. Import of Small Crocodilian Leather Goods

2.1 CITES Import Control

2.1.1. Who is responsible for CITES import control?

☐ Customs – **Bolivia, Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Singapore**

☐ Wildlife Enforcement – **Colombia, Malaysia, Mexico, Thailand, United States**

☐ Other (if other, please explain) – **Switzerland**-CITES Control posts. **Zambia**-no imports.

2.1.2. How do they control?

Zambia-NR

☐ Physical inspection – (**Bolivia**- NR% inspected)(**Bulgaria**- less than 30% inspected)(**Colombia** - NR% inspected)(**France**- low rate, not available % inspected) (**Germany**- less than 50% inspected) (**Japan (Horiuchi Trading Co.)**- 10% inspected)(**Malaysia** NR% inspected) (**Mexico**- 50% inspected)(**Singapore**-ICA conducts random inspection on shipments of LPS. Approximately 20-30 % inspected) (**Switzerland** - 100% inspected) (**Thailand** - 30% inspected) (**United States** - 25% inspected).

☐ Document inspection – (**Bulgaria**- 100% inspected) (**Colombia** - NR% inspected)(**France**- 100% inspected) (**Germany**- 100% inspected) (**Japan (Horiuchi Trading Co.)**- 90% inspected) (**Malaysia** 100% inspected) (**Mexico**- 50% inspected)(**Singapore**- ICA conducts random inspection on shipments of LPS. Approximately 80-90 % inspected) (**Switzerland** - 100% inspected) (**United States** - 100% inspected).

☐ Risk analysis – **Bulgaria, France, Malaysia, United States**

2.1.3. How many imports of small crocodilian leather products involving personal effects resulted in CITES violations (e.g., invalid or missing permit/certificate, incorrect species, exceeded permit/certificate quantity, etc.) in 2007?

Bolivia- NR, Japan (Horiuchi Trading Co.)-NR, Mexico-NR, Zambia-NR

☐ 0-25 – **Bulgaria, Colombia, Malaysia, Singapore, Thailand**

☐ 26-50 – **France, Switzerland**

☐ 51-100

☐ More than 100 – **Germany, United States**

2.1.4. How many imports of small crocodilian leather products involving commercial shipments resulted in CITES violations (e.g., invalid or missing permit/certificate, incorrect species, exceeded permit/certificate quantity, etc.) in 2007?

Mexico-NR, Zambia-NR

☐ 0-25 – **Bulgaria, Colombia, France, Japan (Horiuchi Trading Co.), Malaysia, Singapore, Thailand**

☐ 26-50 – **Bolivia, Germany**

☐ 51-100 – **Switzerland**

☐ More than 100 – **United States**

3. Stricter Domestic Measures For Import of Small Crocodilian Leather Goods

3.1. General Information

3.1.1. Do you require the issuance of import permits for the import of Appendix- II specimens?

Japan (Horiuchi Trading Co.)-Wrong Form. Zambia-NR

☐ Yes – **Bolivia, Bulgaria, France, Germany, Malaysia, Mexico, Switzerland, Thailand**

☐ No – **Colombia, Singapore, United States**

3.1.2. Has the number of import permits issued changed over the last ten years?

United States –N/A, Zambia-NR

☐ Yes, increased – **Bolivia, Bulgaria, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Switzerland, Thailand**

☐ Yes, decreased

☐ No – **Colombia, Singapore**

3.1.3. Total number of import permits issued for small crocodilian leather products in 2007?

United States –N/A, Zambia-NR

☐ 0 – **Colombia, Singapore**

☐ 1-250 – **Bolivia, Bulgaria**

☐ 251-500 – **Malaysia**

☐ 501-1000 – **Malaysia, Mexico**

☐ 1001-10000 – **Germany**

☐ Over 10000 – **France, Switzerland, Thailand**

☐ Other (if other, please explain) – **Japan (Horiuchi Trading Co.)**- In Japan, import permits are given to the importer only after customs clearance. Therefore, we do not need and cannot apply an import permit in advance. HOWEVER, regarding products from farm raised crocodiles of which wild specimens are on Appendix I to the CITES, Japanese importers must apply for and obtain an import license prior to the importation. **Singapore**-CITES import permits are currently not required for crocodilian small leather products. However, the importer must be able to produce a valid copy of the CITES export/re-export permit from the country of last export/re-export as a supporting document if he wishes to re-export the products.

3.2. Application for Import Permits

3.2.1. How can import permits be requested?

United States –N/A, **Zambia**-NR

☐ Electronically – **France, Germany, Malaysia, Switzerland**

☐ Telephone/Fax – **Germany, Switzerland**

☐ Postal Service – **Colombia, France, Germany, Mexico, Switzerland, Thailand**

☐ Other (if other, please explain) – **Bolivia**-Solicitud Escrita. **Bulgaria**-The application are usually received by a special counter desk for public service organized in the Ministry of Environment and Water. **Japan (Horiuchi Trading Co.)**-The applicant for an import license must submit papers to M.A. **Mexico**-Directly at the Management Authority office. **Singapore**-CITES import permits are currently not required for crocodilian small leather products.

3.2.2. Do commercial importers benefit from facilitated or standardized import procedures?

Bulgaria-NR, **Zambia**-NR. **Japan (Horiuchi Trading Co.)**-Y and N, yes because we can obtain needed import license or re-export certificate in 3 days, THANK GOD, subject that we succeed in attaching valid and accurate enough supporting documents. No because until a few years ago, the same service used to be given to us in two days. **Thailand**-NR. **United States** –N/A

☐ Yes (if yes, please explain) – **Bolivia**-al tener parametros de la estandarización las autorizaciones son mas rapidas. **Malaysia**. **Mexico**-Yes, the procedures are easier and faster. **Singapore**-CITES import permits are currently not required for crocodilian small leather products. **Switzerland**-Professional importer: A general import permit is issued for species listed in Appendix II and III of the CITES Convention. It is valid for two years and there are no quantity restrictions.

☐ No – **Colombia** no importa articulos elaborados en piel de cocodrilo. **France**-The EU does not use simplified procedures with regard to imports, because there are more potential risks. **Germany**-No, because we don't use that procedures for the import of small leather products.

3.3. CITES Import Permit

3.3.1. How long does it take to issue a CITES Import Permit?

Singapore-N/A, **United States** –N/A, **Zambia**-NR

☐ Hours (_____)

☐ Days – (**Bolivia**-5) (**Bulgaria**-5)(**Colombia**-12) (**France** 1-6)((**Germany**-5)(**Japan (Horiuchi Trading Co.)**)-3)(**Malaysia**-3)(**Mexico**-10)(**Thailand**-7)

☐ Weeks (_____)

☐ Months (_____)

☐ Between (_____) and (_____) – (**France**-between 1 and 6 days). (**Switzerland**- between 1 and 5 days)

3.4. Other Stricter Domestic Measures

3.4.1. Do you have other stricter domestic measures related to the import of small crocodilian leather products?

Zambia-NR.

☐ Yes, describe – **Bolivia**. **France**-Regulation (EC) n° 811/2008 suspending the introduction into the Community of specimens of certain wild fauna and flora from countries where the related exports are considered as non sustainable or potentially non sustainable. **Germany**-We have to implement the EU Commission Regulation suspending the introduction into the European Community of specimens of certain wild fauna and flora (current Comm. Reg. EC 811/2008). **Japan (Horiuchi Trading Co.)**-Before COP 14, Overo Caiman Latirostris was the item we needed to register to Environment Agency paying Yen 2,800/pce, even after previous COP moved this species from Appendix I to II, and although Argentina M.A. issued legal CITES Export Permit. **Malaysia**-import license under the Protection of Wild Life Act 1972. **Mexico**-Yes, our domestic wildlife law (Ley General de Vida Silvestre) establishes that the importation of these products need a CITES permit. **United States**-Certain procedures required for crocodilian species listed under the U.S. Endangered Species Act (ESA). Under the ESA, "Threatened" crocodilian means any live or dead specimen of the following species: yacare caiman (*Caiman yacare*), common caiman (*Caiman crocodilus crocodilus*), brown caiman (*Caiman crocodilus fuscus* , including *Caiman crocodilus chiapasius*), saltwater crocodile (*Crocodylus porosus*) originating in Australia (also referred to as Australian saltwater crocodile), and Nile crocodile (*Crocodylus niloticus*).

☐ No – **Bolivia (Friends of Nature), Bulgaria, Colombia, Singapore, Switzerland, Thailand**

4. Export and Re-export of Small Crocodilian Leather Goods

4.1. CITES Export and Re-export Control

4.1.1. What agency or agencies is/are responsible for issuing CITES export permits/re-export certificates?

Bolivia-NR. **Bulgaria**-Ministry of Environment and Water. **Colombia**- Ministerio de Ambiente, Vivienda y Desarrollo Territorial - Dirección de Ecosistemas. **France**-"Directions régionales de l'Environnement" (DIREN). **Germany**-Federal Agency for Nature Conservation. **Japan (Horiuchi Trading Co.)**- Ministry of Economy, Trade and Industry (METI). **Malaysia**- Department of Wildlife and National Parks (DWNP) for Peninsular Malaysia. **Mexico-NR.** **Singapore**-AVA. **Switzerland**-Veterinary Office,CITES Management Authority,Schwarzenburgstrasse 155,CH-3003 Bern. **Thailand**-Department of Fisheries, Bureau of Fisheries Administration and Management. **United States**- U.S. Department of the Interior, U.S. Fish and Wildlife Service. **Zambia**-Zambia Wildlife Authority.

4.2. Export

4.2.1. Has the number of CITES Export Permits issued changed over the last ten years?

Bolivia-NR, Bulgaria-NR.

☐ Yes, increased – **Colombia, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Thailand, United States, Zambia**

☐ Yes, decreased

☐ No – **France, Germany, Singapore, Switzerland**

4.2.2. How many export permits were issued in 2007 for small crocodilian leather products?

Bolivia-NR

- ☐ 0 – **France, Zambia**
- ☐ 1-250 – **Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Switzerland**
- ☐ 251-500
- ☐ 501-1000 – **Colombia**
- ☐ 1001-10000 – **United States**
- ☐ Over 10000 – **Thailand**
- ☐ Other (if other, please explain) – **Bulgaria**-We are not an exporting country

4.3. Re-export

4.3.1. Has the number of CITES Re-export Certificates issued changed over the last ten years?

Bolivia-NR

- ☐ Yes, increased – **Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Mexico, Singapore, Switzerland, Thailand, United States**
- ☐ Yes, decreased
- ☐ No – **Bulgaria, Zambia**

4.3.2. How many re-export certificates were issued in 2007 for small crocodilian leather products?

Bolivia-NR

- ☐ 0 – **Zambia**
- ☐ 1-250 – **Bulgaria, Japan (Horiuchi Trading Co.)**
- ☐ 251-500 – **Malaysia**
- ☐ 501-1000 – **Colombia, Mexico**
- ☐ 1001-10000 – **Singapore, Germany, United States**
- ☐ 10001-100000 – **France, Switzerland, Thailand**
- ☐ Over 100000
- ☐ Other (if other, please explain) – **Switzerland**-over 80,000 certificates.

4.4. Application for CITES Export Permits/Re-export Certificates for Small Crocodilian Leather **Products**

4.4.1. How can CITES Export Permits/Re-export Certificates be requested?

Bolivia-NR

- ☐ Electronically – **Colombia, France, Germany, Malaysia, Singapore, Switzerland**
- ☐ Telephone/Fax – **Germany, Switzerland**

- ☐ Postal Service – **Bulgaria, France, Germany, Mexico, Switzerland, Thailand, United States**
- ☐ Other (if other, please explain) – **Bulgaria**-The application are usually received by a special counter desk for public service organized in the Ministry of Environment and Water. **Japan (Horiuchi Trading Co.)**- Exporters have to physically present documents to M.A. and normally wait for 2 or 3 days until issued. **United States**-in person. **Zambia**-No export/re-export of leather products.

4.4.2. Do exporters/re-exporters benefit from streamlined or simplified export or re-export procedures?

Bolivia-NR. **Bulgaria**-NR. **Japan (Horiuchi Trading Co.)**-Y and N, yes-in case the buyer is an end user, immediate issuance shall be appreciated, no because for commercial transactions, the applicant must follow the rules even if it takes a few days. **Zambia**-NR.

- ☐ Yes (if yes, please explain) – **Colombia**-Existe beneficio en reduccion de tramites y tiempo y tienen acceso al estado de su tramite. **France**-Simplified procedures with regard to "dead specimens" for some agreed companies. Furthermore, France has issued since 2008 sample collection certificates (ATA carnets). **Germany**-Since 2008 Germany has implemented the provisions embedded in the EU CITES implementation regulation for issuing sample collection certificates. **Malaysia**. **Mexico**-The exportation or re-exportation procedures are easier and faster. **Singapore**-The electronic CITES permit system enables an exporter/re-exporter to obtain from AVA, pre-signed CITES permits within 2 working days. The pre-signed permit system allows the exporter/re-exporter to provide a CITES export-re-export permit, on the spot, to a walk-in tourist who purchases a few personal crocodilian LPS. This facilitates the issuance of CITES export/re-export permit to a traveler who departs from Singapore on the same day after making a purchase. **Switzerland**-e-CITES: It is an internet-based system, comparable to a bank account, which gives the importer the possibility to apply for permits/certificates electronically. The importers enter their import data into their "bank-account". The CITES Management Authority controls the data based on the original foreign CITES documents and only after this control can the re-exporter apply for re-export permits. The CITES MA can reject applications or authorize them. Printing is either performed in the MA or at the wish of the re-exporter at chambers of commerce attached to that system. It accelerates the process of permits'/certificates' issuance in an significant way (issuance in less than 5 hours). **Thailand**-approve law. **United States**-The U.S. Management Authority has incorporated elements of Resolution Conf. 12.3 (Rev. CoP 14), XII ("Regarding the use of simplified procedures to issue permits and certificates") to establish a procedure where applicants, such as leather good re-exporters, can received a number of partially completed certificates. This system can greatly reduced the application processing time for re-exporters. Currently, the U.S. Management Authority has implemented this procedure with approximately 15 leather product companies and is communicating with additional companies to authorize their utilization of this program.

- ☐ No, because

4.5. CITES Export Permits/Re-export Certificates

4.5.1. Approximately how long does it take to issue a CITES Export Permit/Re-export Certificate/Certificate?

Bolivia-NR

- ☐ Hours (_____)
- ☐ Days – (**Bulgaria**-5)(**Colombia**-12) (**France**-between 1 and 6) (**Germany**-5)(**Japan (Horiuchi Trading Co.)**-3)(**Malaysia**-3)(**Mexico**-10)(**Singapore**-2)(**Thailand**-7) (**United States** -2-14 re-exports, 2-30 exports) (**Zambia**-2)
- ☐ Weeks (_____)
- ☐ Months (_____)
- ☐ Between (_____) and (_____) – **Switzerland** Between (5 hours) and (4 days)

4.6. CITES Export/Re-export Control

4.6.1. Who is responsible for the CITES Export/Re-export Control?

Bolivia-NR

- ☐ Customs – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Malaysia, Singapore, Switzerland**
- ☐ Wildlife Enforcement – **Colombia, Malaysia, Mexico, Thailand, United States, Zambia**
- ☐ Other (if other, please explain) – **Singapore-ICA and AVA**

4.6.2. How do they control?

Bolivia-NR

- ☐ Physical inspection – (**Bulgaria-10 % inspected**)(**Colombia-NR % inspected**)(**France-NR % inspected**)(**Germany-NR % inspected**)(**Japan (Horiuchi Trading Co.)- I assume approximately 10 % inspected**)(**Malaysia-NR % inspected**)(**Mexico-50 % inspected**)(**Singapore-ICA and AVA conduct random inspection on shipments of LPS. Approximately 30-40 % inspected**)(**Switzerland -NR % inspected**)(**Thailand -30 % inspected**) (**United States -25 % inspected**)(**Zambia-100 % inspected**).
- ☐ Document inspection – (**Bulgaria-100 % inspected**)(**Colombia-NR % inspected**)(**France-100 % inspected**)(**Germany-100 % inspected**)(**Japan (Horiuchi Trading Co.)- I assume approximately 90 % inspected**)(**Malaysia-100 % inspected**)(**Mexico-50 % inspected**))(**Singapore-ICA and AVA conduct random inspection on shipments of LPS. Approximately 80-90 % inspected**)(**Switzerland -100 % inspected**)(**Thailand -70 % inspected**)(**United States -100 % inspected**)(**Zambia-100 % inspected**).
- ☐ Risk analysis – **Bulgaria, France, Malaysia, United States**

5. Other Issues

5.1. What adjustments, if any, to your stricter domestic measures could help reduce your current administrative burden regarding small crocodilian leather products?

Bolivia-NR. **Bulgaria-**Simplification of the legislation by removing the requirements for issuing of import permits for small leather products of the crocodilian species listed in CITES Appendix II. **Colombia-**Debería realizarse un trabajo en conjunto con lo manufacureros, con el fin de determinar una medida estandar sobre el tipo de producto, cantidad y tamaño que pueden ser obtenido a partir de una piel terminada tomando como referente el tamaño de la misma. Esta medida ayaudaria no solo a reducir la carga administrativa actual si no que permitira hacer un control mas efectivo y objetivo sobre las pieles que son utilizadas para este fin. **France-** Electronic permits (hard copies deletion, at least in some cases). Amendment to the EC Council Regulation in order to make the use of simplified procedure more flexible, which would lead MAs to issue less certificates of re-export. **Germany-**The renunciation of issuing CITES permits for small leather products made from certain crocodilian species (e. g. Alligator mississippiensis) which could be achieved through delisting such a species or a certain population of it from the CITES Appendices. **Japan (Horiuchi Trading Co.)-NR.** **Malaysia-NR.** **Mexico-NR.** **Singapore-**AVA is considering implementing Res Conf 13.7 (rev COP14) in which Parties have agreed to grant permit exemption of up to 4 crocodilian specimens per person for personal and household effects. **Switzerland-** The administrative burden concerning stricter domestic measures are rather small, as we have registered traders. **Thailand-** Already sufficient measures. **United States-**none are necessary. **Zambia-NR.**

5.2. Please describe any previous experience evaluating the implementation and effectiveness of issuing CITES documents for small crocodilian leather products.

Bolivia-NR. **Bulgaria-NR.** **Colombia-NR.** **France-** Simplified procedures make things easier for traders but do not really alleviate administrative burden. **Germany-NR.** **Japan (Horiuchi Trading Co.)-NR.** **Malaysia-NR.**

Mexico- An interconnection with the customers' office, for a better control. **Singapore-** CITES regulations apply to "readily-recognizable" specimens of CITES species. As we considered if manufactured leather products could be classified as "readily-recognizable", we adopted the pre-signed CITES permit system to facilitate the trade. We also questioned the effectiveness of CITES controls for crocodilian leather products especially when there are so many faux crocodilian leather products in the market which may pose an enforcement challenge to Customs officers. **Switzerland-** Before implementing the e-CITES software, the issuance was even more burdensome for the office and the traders. We have made the experience, that the trade is very willing to contribute to a better, stricter and easier functioning of the permit issuance. **Thailand-** We check stocks of goods and Conform to trade document (Import-Export permit, Movement document) before permit issue. **United States-NR. Zambia-NR.**

5.3. How were the administrative burdens related to trade in small crocodilian leather products alleviated?

Bolivia-NR. Colombia-NR. Bulgaria-NR. France-They were not alleviated. **Germany-**Through the introduction of electronic permitting procedures (URL: www.cites-online.de) and electronic means of payment of fees for CITES permits allowing one payment procedure for consecutive numbered permits, e.g. 10 permits with the numbers 1,2,3..., are summed up to one invoice and one payment procedure. **Japan (Horiuchi Trading Co.)-**This is my opinion. As far as Japan's Import and Re-Export of crocodilian small goods, I believe the volume is coming close to the limit that M.A. can handle. If and when timeliness is improved (such as, re-export certificate is given to the consumer on the spot of sales), number of the permits will be dramatically increased. I assume European countries' M.A. are facing a lot more documents than they can handle. In this sense, I support the idea to streamline the system. On the other hand, current control system by export or re-export permit was established as a result of long discussions on how to conserve the wild animals and their habitats. Therefore, we still need effective control system. In order to remove major part of European M.A.'s burden, while keeping the situation under CITES control, I would suggest that only watchstraps should be regarded as an exemption from CITES permit system. Meanwhile other small products must comply with current CITES requirements. **Malaysia-NR. Mexico-NR. Singapore-**The pre-signed CITES permit system which enables an exporter/re-exporter to obtain from AVA, pre-signed CITES permits within 2 working days, has helped to alleviate administrative burden related to trade in small crocodilian leather products. **Switzerland-e-CITES:** It is an internet-based system, comparable to a bank account, which gives the importer the possibility to apply for permits/ certificates electronically. The importers enter their import data into their "bank-account". The CITES Management Authority controls the data based on the original foreign CITES documents and only after this control can the re-exporter apply for re-export permits. The CITES MA can reject applications or authorize them. Printing is either performed in the MA or at the wish of the re-exporter at chambers of commerce attached to that system. It accelerates the process of permits'/certificates' issuance in a significant way (issuance in less than 5 hours). As a summary:

- some administrative tasks like data entry could be transferred to the trade
- printing and signing is in part performed by chambers of commerce
- handling applications is much faster than under the old system. Basically two persons can treat 90% of the re-export certificates for small crocodilian specimens (authorizing and printing at Veterinary Office).

Thailand-Evaluate the processing products from raw materials before issuance of the permits for small crocodilian leather products in advance for facilitate to the tourists 1 permit per 1 piece. The entrepreneurs must report Department of Fisheries. every month. **United States-** The issuance of export permits and re-export certificates are not an administrative burden on the U.S. Management Authority. However, in an effort to facilitate quicker, more accurate document issuance, the U.S. Management Authority has established procedures to issue partially completed CITES documents, as outlined in Resolution Conf. 12.3 (Rev. CoP14). This procedure has reduced the processing time and ensured greater accuracy in document issuance. In addition, there is an ongoing evaluation of the permit processing procedures implemented by the U.S. Management Authority. Computer automation of the permit issuance process has greatly facilitated the application review process. Updates to this computer system and its software are periodically made to address processing issues and further streamline the permit process. We also encourage input from importers and exporters on how to improve the process. **Zambia-NR.**

5.4. Are there any constraints (e.g. legal or institutional) that would make it difficult or impossible to implement certain procedural or administrative changes?

Bolivia-NR. Bulgaria-The stricter EU requirements laying down in the Council Regulation (EC) No 338/97. **Colombia-**No existen ninguna limitación legal o institucional que haría difícil o imposible llevar a cabo cambios en el procedimiento siempre y cuando se ajuste a las normas legales vigentes en materia de fauna silvestre vigente en el país. **France-**European and National Regulations. **Germany-** The stricter requirements of the Council Regulation (EC) No 338/97. **Japan (Horiuchi Trading Co.)-NR. Malaysia-** Yes, under the Protection of Wild Life Act 1972, no exemption is given for personal (except worn) and household effects and Conf 13.7. **Mexico-No. Singapore-No,** we just need to amend the relevant legislations to provide for any changes e.g. to gazette permit exemptions for certain specimens such as the crocodilian leather products. **Switzerland-**Besides the fact that actually the possibility to go all electronic is not possible under Resolution 12.3, there are no constraints that could not be overcome within a short period of time. **Thailand-**There are legal constraints to use the true signature in the requesting document and permit document. **United States-**There are none that interfere with efforts we have explored. **Zambia-No.**

5.5. Is there any other information not requested above that you wish to share about ways and conditions to alleviate the administrative burden related to trade in regarding small crocodilian leather products?

Bolivia-NR. Colombia-NR. Bulgaria-NR. France-NR. Germany-NR. Japan (Horiuchi Trading Co.)-NR. Malaysia-NR. Mexico-NR. Singapore-NR. Switzerland:

1. The most important problem, which decelerates or deters the Swiss Industry from efficient commerce, is the request for import permits from countries and its correlative long waiting time.
2. In addition making use of the advantages of electronic permitting such as electronic data exchange or the issuance of electronic permits would facilitate the administrative work of all participating Management Authorities.
3. A wish put forward often by trade is that it would make their life much easier, if in addition to the advantages realized with e-CITES, the right of being able to print and sign the permits themselves would be attributed to them.

Thailand-NR. United States-frequent permit verifications from countries that don't recognize the personal effects exemption require additional permit issuance-Japan in particular. Increasing internet sales have dramatically increased permit issuance. **Zambia-NR.**



Implementation and Effectiveness of the Universal Tagging System for the Identification of Crocodilian Skins Questionnaire

1.2. Which agency or agencies serve as the CITES Management Authority in your country?

Bolivia-Dirección General de Biodiversidad y Áreas Protegidas (DGBAP). **Bulgaria**- Ministry of Environment and Water. **Colombia**-Ministerio de Ambiente, Vivienda y Desarrollo Territorial - Directora de Ecosistemas Dr. Bertha Cruz Forero. **France**-One National Management Authority (not issuing permits/certificates): the Water & Biodiversity Department, at the Ministry of Ecology and Sustainable Development; plus: - 30 local Management Authorities issuing permits and certificates: 22 "Directions régionales de l'environnement" (DIREN) in metropolitan France: 4 "Directions régionales de l'environnement" (DIREN) in overseas territories (Guadeloupe, Guyane, Martique, Réunion): 2 "préfectures" (Mayotte, Saint Pierre et Miquelon) and 2 "Hauts-Commissariat de la République" (Polynésie française, Nouvelle Calédonie). **Germany**- 1. Federal Ministry for Environment, Nature Conservation and Nuclear Safety, Robert-Schuman-Platz 3, D – 53175 Bonn and the Federal Agency for Nature Conservation, Konstantinstraße 110, D – 53179 Bonn. **Japan (Horiuchi Trading Co.)**-Ministry of Economy, Trade and Industry (METI). **Mexico**-Dirección General de Vida Silvestre, from SEMARNAT. **Singapore**- Agri-Food & Veterinary Authority of Singapore. **Switzerland**- Veterinary Office, CITES Management Authority, Schwarzenburgstrasse 155, CH-3003 Bern. **Thailand**-License and Management section, Department of Fisheries. **United States**-U.S. Department of the Interior, U.S. Fish and Wildlife Service. **Zambia**-Zambia Wildlife Authority.

1.3. Does your Management Authority oversee the implementation of Resolution Conf. 11.12 (Universal tagging system for the identification of crocodilian skins)?

☐ Yes – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States, Zambia**

☐ No (if no, please explain) – **Bolivia**-Desde el año pasado la DGBAP ha eliminado el uso de precintos para la cosecha y movilización de pieles dentro de Bolivia. Eso afecta la trazabilidad de las pieles, pues si bien se utilizan precintos de exportación, ya no es posible asegurar que las pieles a ser exportadas fueron cosechadas de manera sostenible y son legales en su totalidad.

2. Implementation of Resolution Conf. 11.12 (Universal tagging system for the identification of crocodilian skins).

2.1. CITES Crocodilian Tags

2.1.1. Do you maintain and implement a universal tagging system for the identification of raw, tanned, and/or finished crocodilian skins by requiring the application of non-reusable tags to all crocodilian skins entering international trade?

☐ Yes – **Colombia, France, Germany, Mexico, Singapore-Y&N, Thailand, United States, Zambia**

☐ No (if no, please explain) – **Bolivia**-En el mismo contexto explicado en la respuesta anterior, la eliminación del uso de precintos para cosechar y movilizar pieles en Bolivia, hace que ya no se utilicen precintos en pieles crudas. Los precintos solo se utilizan para marcar las pieles que se van a exportar, lque en su totalidad son curtidas o en 'crust'. **Bulgaria**-Bulgaria is not a skin exporting but only an importing country. **Japan (Horiuchi Trading Co.)**-Japan Management Authority and Customs follow Resolution 11.12, when Japan is importing crocodilian products, however, Japan has not yet provided replacement tag issuing system for re-exportation of those items. **Singapore**-The implementation of the UTS is a shared responsibility between AVA and the Singapore Reptile Skin Trade Association (SRSTA). The SRSTA is responsible for the purchase, keeping of the inventory and

issuance of tags to members. The Association has to comply with a set of conditions e.g. purchase tags from AVA-approved tag manufacturers only, submit a monthly report of the tags issued etc. **Switzerland**-no production of skins.

2.1.2. Do you require that individual crocodilian skins and flanks be individually tagged and that chalecos have attached a tag to each side (flank) before export?

- ☐ Yes – **Bolivia, Colombia, Japan (Horiuchi Trading Co.), Mexico, Singapore, Thailand, United States, Zambia**
- ☐ No (if no, please explain) – **Bulgaria**-Bulgaria is not a skin exporting but only an importing country. **France**-France is only concerned as re-exporting country. **Germany**-Germany is not a crocodilian skin exporting but only a re-exporting country. **Singapore**-Full skins are required to be individually tagged. Flanks or side skins may be transported in clear plastic bag and marked with a tag. **Switzerland**-no production of skins.

2.1.3 Do you require that chalecos have tags attached with the same number or different numbers?

Japan (Horiuchi Trading Co.)-wrong form, **Singapore-NR, Switzerland-NR**

- ☐ two tags with **same** identification number – **Colombia**
- ☐ two tags **each with a unique** serial identification number – **Bolivia, Bulgaria, France, Germany, Mexico, Thailand, United States, Zambia**

2.1.4. Would you consider it more appropriate for chalecos to have only one tag attached to the skin instead of a tag to each side (flank) before export?

Japan (Horiuchi Trading Co.)-wrong form, **Switzerland-NR, United States-NR**

- ☐ Yes – **Bulgaria, Colombia, France, Germany, Mexico, Singapore, Thailand, Zambia**
- ☐ No (if no, please explain) – **Bolivia**-Las piezas de una piel pueden tener diferentes destinos de exportación.

2.1.5. Are your CITES crocodilian tags non-reusable and do they include the ISO two-letter code for the country of origin?

- ☐ Yes – **Bolivia, Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States, Zambia**
- ☐ No (if no, please explain) – **France**-French regulation imposes systematic re-tagging of any skin or flank before re-export, while keeping the original tags attached. Since only re-export is concerned, country of origin ISO code is not required. Only ISO code for France is mentioned on the tag (FR RE EXP + serial identification number).

2.1.6. Do your CITES crocodilian tags include a unique serial identification number?

- ☐ Yes – **Bolivia, Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States, Zambia**
- ☐ No (if no, please explain)

2.1.7. Do your CITES crocodilian tags include a standard species code (as provided in Annex 1, Resolution Conf. 11.12)?

- ☐ Yes – **Bolivia, Colombia, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Thailand, United States, Zambia**
- ☐ No (if no, please explain) – **Bulgaria,**

France-Since only re-export is concerned, standard species code is not required. **Switzerland**-no skin production.

2.1.8. Do your CITES crocodilian tags include the year of production or harvest, in accordance with the provisions of Resolution Conf. 11.16 (Rev. CoP14)?

☐ Yes – **Bulgaria, Japan (Horiuchi Trading Co.), Mexico, Singapore, Thailand, Zambia**

☐ No (if no, please explain) – **Bolivia**-Incluyen el año de exportación, pero este no necesariamente coincide con el año de captura o producción. **Colombia**-Las pieles que se producen en Colombia proceden de sistema de cría en cautividad, en este sentido no necesariamente las exportaciones de pieles o partes (flancos y colas) corresponden al año inmediato de la producción. Por esta razón en los precintos de exportación se incluye es el año calendario. **France**-Since only re-export is concerned, year of production is not required. **Germany**- Germany's re-export tags include the year of the export from the country of origin but not the year of production. **Switzerland**-no skin production. **United States**-We include the year on regular tags, but not in the sequence as described in the resolution. Emergency use tags and replacement tags do not include the year of production or harvest.

2.1.9. Do your CITES crocodilian tags have a self locking mechanism with sufficient characteristics to prevent any reuse?

☐ Yes – **Bolivia, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States, Zambia**

☐ No (if no, please explain) – **Bulgaria**

2.1.10. Do your CITES crocodilian tags have resistance to heat, mechanical processing, and chemical processing?

☐ Yes – **Colombia, France, Germany, Singapore* , Thailand, United States, Zambia**

☐ No (if no, please explain) – **Bolivia**-En diferentes curtiembres se quejan de que los precintos no resisten el proceso de curtido y se desprenden de las pieles. **Bulgaria. Japan (Horiuchi Trading Co.)**- For heat, not tested. During mechanical/chemical processing, 5-30% of the tags get broken. **Mexico**-The CITES crocodilian tags can be destroyed with chemical processing.

2.1.11. Do your CITES crocodilian tags have alphanumeric information applied by permanent stamping?

☐ Yes – **Bolivia, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States, Zambia**

☐ No (if no, please explain) – **Bulgaria**

2.1.12. Do your CITES crocodilian tags include bar codes or any other innovative marking technologies?

☐ Yes (if yes, please describe) – **United States**-80% of our crocodilian tags are bar-coded.

☐ No – **Bolivia, Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, United States-Y&N, Zambia**

2.1.13. Do your CITES crocodilian tags have the year of production and serial number separated with a hyphen (-) where the information on tags appears in the sequence: country of origin, year of production, serial number, species code?

☐ Yes – **Bolivia, Japan (Horiuchi Trading Co.), Mexico, Thailand**

* **Singapore**-Yes, however, we received information that tags from a certain manufacturer (listed in Notification to the Parties no 2004/063) could be opened by heating the locked tag in hot water for several minutes.

- ☐ No (if no, please explain) – **Bulgaria**-Bulgaria is not a skin exporting but only an importing country. **Colombia**-la información que se incluye en los precintos de exportación corresponde al código del país (CO) seguido del año de expedición o fabricación del precinto año calendario (Tal y como se explico en la pregunta 2.1.8) 2009, posteriormente código de la especie FUS , CRO ó ACU sigla del ministerio MMA y finalmente la numeración consecutiva e irrepetible para cada precinto que consta de seis dígitos. Como ejemplo para dos precintos de exportación de pieles entreas crudas saladas de la especie babilla C.c fuscus sería: CO2009FUSMMA 000001 CO2009FUSMMA 000002. Adicionalmente de acuerdo a la especie se tiene un color que los identifica en particular siendo para C.crocodilus precintos de color naranja y par Crocodylus acutus color azul. **France**-Re-export only. **Germany**-Germany is not a crocodilian skin exporting but only a re-exporting country. **Singapore**-The export tags have all the information but the sequence is slightly different. E.g. of an export tag: CITES SG POR 2008 0000001 (where POR is the species code for Crocodylus porosus). There is no hyphen separating the year of production and serial number, as there is a 3.7cm space between the year of production and the serial number. A picture of the SG export tag is enclosed for reference. **Switzerland**-no skin production. **United States**-Tag legend is not as described in the resolution. **Zambia**-Separated by space e.g. ZM NIL 08 (year) 0000069 (for the 69th skin of 2008).

2.1.14. Do you use CITES crocodilian tags to label skins derived from crocodilian hybrids with the designation HYB, or where the parentage is known, the two three letter codes for the parents, separated by the character 'x' (e.g. PORxSIA)?

☐ Yes – **Singapore, Thailand**

- ☐ No (if no, please explain) – **Bolivia**-En Bolivia no se está trabajando con híbridos. **Bulgaria**-Bulgaria is not a skin exporting but only an importing country. **Colombia**-En Colombia no se producen ni exportan se exportan pieles o partes derivadas de cocodrilos híbridos. **France**-France not concerned. **Japan (Horiuchi Trading Co.)**-As far as I know no hybrid species are imported to Japan for many years. **Mexico**-We don't have crocodilian hybrids farms in Mexico, only registered farms with pure specimens. **Switzerland**-no skin production. **United States**-Hybrid crocodilians are not exported. **Zambia. Germany**-Germany has never had cases of re-exports of such skins.

2.1.15. Are crocodilian tails, throats, feet, backstrips, and other parts exported in transparent, sealed containers clearly marked with a non-reusable tag together with a description of the content and total weight, and all the information required for tags for individual skins, flanks and chalecos?

Zambia-NR

- ☐ Yes – **Bolivia, Colombia, Japan (Horiuchi Trading Co.), Singapore. United States** - we require a non-reusable tag or label.
- ☐ No (if no, please explain) – **Bulgaria**-Bulgaria is not a skin exporting but only an importing country. **France**- France not concerned. **Germany**-Germany is not a crocodilian skin exporting but only a re-exporting country. **Mexico**-Mexico doesn't have any registered case of exportations made in transparent, sealed containers, but in case of having a case like this, we would do as it is described. **Switzerland**-no production. **Thailand**-It is quite difficult to practice.

2.1.16. Do you register and/or license producers, tanners, importers and exporters of crocodilian skins?

☐ Yes – **Bolivia, Colombia, France, Mexico, Singapore-Y&N, Thailand, Zambia**

- ☐ No (if no, please explain) – **Bulgaria**-No legal provisions are in place for implementation of such registration. **Germany**-No legal provisions in our EU CITES implementation regulation nor in our national conservation law have been provided for the implementation of such a registration. **Japan (Horiuchi Trading Co.)**-In Japan no such registration is required. **Singapore**-AVA licenses crocodile farms and also registers them with the CITES Secretariat for captive-breeding of Appendix I crocodilians e.g. Crocodylus porosus or saltwater crocodiles. AVA does not register or license tanners, importers and exporters of crocodilian skins. **Switzerland**-no skin production. **United States**-USFWS licenses importers and exporters, but tanners and producers are only licensed at the state level, if at all.

2.1.17. When re-exporting raw, tanned, and/or finished crocodilian skins, do you implement an administrative system for the effective matching of imports and re-exports and, further, ensure that skins and flanks are re-exported with the original tags intact unless the pieces originally imported have been further processed and cut into smaller pieces?

☐ Yes – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.)-Y&N, Mexico, Singapore-Y&N, Switzerland, Thailand, United States**

☐ No (if no, please explain) – **Bolivia**- Hay muchas limitaciones operativas y la DGBAP no puede realizar un control sobre todas las exportaciones. **Japan (Horiuchi Trading Co.)**-Japan is confirming the effective matching of imports and re-export by checking tag list only. If this is sufficient, the answer is Yes. In case physical checking is required, the answer is No. **Singapore**-Where possible, processed skins are re-exported with original tags. Otherwise, they will be re-tagged with re-export tags. The re-tagging applies to skins that have been further processed or cut into smaller pieces. The system ensures that skins are legally imported and re-exported with CITES permits. **Zambia**-we do no import or re-export.

2.1.18. In the case where the original crocodilian tags have been lost or removed from raw, tanned, and/or finished skins and flanks, do you tag such skins or flanks prior to re-export, with a 're-export tag' meeting all the requirements of Resolution Conf. 11.12 (except that the country of origin and standard species codes and years of production and/or harvest is not required); and further, that the same information as is on these tags is provided on the re-export certificate together with details of the original permit under which the skins were imported?

☐ Yes – **Bolivia, Bulgaria, Colombia, France, Germany, Mexico. Singapore**-skins that have lost the original tags are re-tagged with re-export tags. E.g. of a re-export tag: CITES SG RE-EXP A000001. A picture of the re-export tag is enclosed for reference. The re-export permits would record the original permit under which the skins were imported and the re-export tag numbers. Alternatively, the exporter may attach a tag list as an Annex or integral part of the re-export permit, **Switzerland, Thailand, United States**-We use replacement tags.

☐ No (if no, please explain) – **Japan (Horiuchi Trading Co.)**- As I already replied in the Point 2.1.1, Japan has no system to issue replacement tags for lost or removed tags. **Zambia**-we do no import or re-export.

2.1.19. Do you ensure that CITES crocodilian tags not affixed to skins, flanks and chalecos in the year specified on the tag are destroyed?

☐ Yes – **Bolivia, Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.)-Y&N, Singapore, Thailand**

☐ No (if no, please explain) – **France**-France not concerned. **Japan (Horiuchi Trading Co.)**-Japan has no tag issuing system. **Mexico**-We don't have any registered case like this, but if so we do as it is described. **Switzerland**-no skin production. **United States**-Though states are advised to destroy unused tags, we do not verify that destruction occurs. **Zambia**-tags are usually exhausted before the year ends.

3. Implementation of Resolution Conf. 11.12 Annex 2 (Management and tracking system for tags used in the crocodilian skin trade).

3.1. Management of CITES crocodilian tags.

3.1.1. Do you interpret "year of production" in Resolution Conf. 11.12 as referring to a calendar year?

☐ Yes – **Bolivia, Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.), Mexico, Singapore, Thailand, Zambia**

☐ No, (if no, please explain) – **France**-France not concerned. **Switzerland**-no skin production. **United States**-We utilize harvest seasons which may include a portion of consecutive calendar years.

3.1.2. Do you report the details of CITES crocodilian tag orders to the Secretariat, as called for in Resolution Conf. 11.12?

☐ Yes – **Colombia, Zambia**

☐ No, (if no, please explain) – **Bolivia**-No tengo conocimiento. **Bulgaria**-Bulgaria is importing country of small leather products and hunting trophies. We accept the original tags of the country of origin for the hunting trophies without any changes unless the specimen is split up in parts. **France**-Heavy system to implement. **Germany**-Germany does not report tag orders to the Secretariat because it considers such reporting as burdensome and not of any enforcement relevance. In addition the Secretariat has never reported to the Parties on the magnitude, significance and relevance of such a reporting. **Japan (Horiuchi Trading Co.)**-I understand that Japan is reporting only quantity per species without detailed tag numbers. **Mexico**-We have not notified. **Singapore**-We have not implemented Annex 2 of the Resolution. **Switzerland**-no skin production. **Thailand. United States**-Reporting CITES crocodilian tag orders to the Secretariat is unnecessary.

3.1.3. Have you requested that the Secretariat purchase and distribute CITES crocodilian tags for your Management Authority?

Bolivia (NR)

☐ Yes, because

☐ No, because – **Bulgaria**-There is no need for such type of tags. **Colombia**-El Decreto 1608 de 1978, establece en el numeral 4 del artículo 151, la obligatoriedad de marcar los individuos de los zocriaderos y los productos obtenidos en él, mediante el sistema de marcaje aprobado y registrado ante la entidad administradora del recurso. Por su parte la Ley 611 de 2000 en su artículo 19 define que “Cada criador deberá proponer en el proyecto conforme a las disposiciones nacionales e internacionales al respecto, las alternativas para el sistema de identificación de los especímenes que podrá establecer en el zocriadero. Parágrafo de dicho artículo La autoridad ambiental competente establecerá el método de marca o identificación según cada especie. Las marcas o identificaciones una vez colocadas no podrán retirarse hasta el destino final de los especímenes y sólo podrán ser remplazadas por la autoridad ambiental competente”. Posteriormente, este Ministerio definió un marco normativo para el marcaje de especímenes de fauna (especímenes vivos) silvestres, como marco de referencia nacional a ser adoptado por las Corporaciones Autónomas Regionales. En él se definen los procedimientos, los plazos, el registro y seguimiento a las actividades comerciales y de movilización nacional e internacional de especímenes de fauna silvestre nativa y/o exótica en condiciones de conservación ex situ, así como las incluidas en los Apéndices CITES criadas en cautividad. En igual sentido en Colombia las empresas proveedoras de los sistemas de marcaje, de especimens de fauna silvestre deben estar previamente autorizadas por este Ministerio. Para el caso de los precintos y teniendo en cuenta la Res. Conf. 11.12, en Colombia los precintos y marquillas de exportación son fabricados por Industrias Alphex, empresa autorizada y registrada por la Secretaria CITES com proveedora y fabricante de precintos. **France**-National MA oversees itself tag orders. **Germany**-In Germany it is always the Management Authority that orders the tags which are afterwards only delivered to the MA after the private sector has paid directly upon receipt of the invoice the tag costs to the tag manufacturing company which then delivers the tags only to the CITES MA. This procedure has been chosen to be faster and more flexible in financial and budgetary issues within the government agency that host the CITES MA. **Japan (Horiuchi Trading Co.)**-Not applicable to Japan. **Mexico**-no because we authorize the approved registered crocodilian farms to purchase their own tags. **Singapore**-We have delegated the responsibility to the SRSTA (please see our response to 2.1.1). **Switzerland**-No skin production. **Thailand**-Directly purchased from registered factory. **United States**-No, because it is not necessary. **Zambia**-We order through the Secretariat but once the invoice comes from the manufacturer, we purchase them.

3.1.4 When issuing export permits or re-export certificates for crocodilian skins, or other specimens referred to in Resolution Conf. 11.12, have you recorded the numbers of the tags associated with each document and made this information available to the Secretariat upon request?

Switzerland-NR

- ☐ Yes – **Colombia, France, Japan (Horiuchi Trading Co.), Mexico, Singapore, Thailand, United States, Zambia**
- ☐ No, (if no, please explain) – **Bolivia**- No tengo conocimiento. **Bulgaria**-All relevant information for the specimens are recorded in the CITES documents. No request from the CITES Secretariat had never been received. The information of the tags numbers of the imported specimens could be seen in the Annual Report. **Germany**-The number of tags associated with the issuance of each CITES document are always recorded. However this kind of information had never been communicated to the CITES Secretariat. Furthermore the Secretariat has never requested this information from the CITES MA in Germany.

3.1.5 If you require tags on containers of crocodilian parts, have you provided a sample tag to the Secretariat for reference?

- ☐ Yes – **Japan (Horiuchi Trading Co.), Zambia**
- ☐ No, (if no, please explain) – **Bolivia**- No tengo conocimiento. **Bulgaria**-Not applicable. **Colombia**-La exportaciones se hacen por via maritima o aérea pero cada piel o parte tiene su respectivo precinto de exportación. **France**-France not concerned. **Germany**-Germany has never. **Mexico**-No, we have not. **Singapore**-The tag is the same as that used for individual crocodile skins. **Switzerland. Thailand. United States**-We require a non-reusable tag or label, but a sample tag has not been provided to the Secretariat for reference.

4. Effectiveness of the Universal Tagging System for the Identification of Crocodilian Skins

4.1. General Information

4.1.1. Approximately how many CITES crocodilian tags do you use annually?

- ☐ 1-100 – **Bulgaria, Switzerland**
- ☐ 101-1000 – **Germany**
- ☐ 1001-5000 – **Mexico**
- ☐ 5001-20000 – **Thailand**
- ☐ 20001-50000 – **Bolivia, France, Japan (Horiuchi Trading Co.), Zambia**
- ☐ 50001-100000
- ☐ 100001-500000 – **Singapore**
- ☐ Other – **Colombia**-500000-1.000.000, **United States**-500,000-800,000

4.1.2. What is the approximate annual cost (in U.S. dollars) of your universal tagging system for the identification of crocodilian skins?

Bolivia-No tengo conocimiento. **Bulgaria**-NR, **Colombia**-0.105 x 6820000 (precintos de exportación) Total de 71610 **France**-1.16, **Germany**-between 0,30 - 0,60 US \$ in dependency of the amount of ordered tags which is usually less than 1.000 tags for one trader's re-export application, **Japan (Horiuchi Trading Co.)**-Not applicable to Japan because Japan has never issued tags, **Mexico**-20 cents, **Singapore**-the SRSTA pays the tag manufacturer directly every time it places an order for new tags, **Switzerland**-40 USD, **Thailand**-NR, **United States**-USD\$125,000 **Zambia**-NR. To administer program: USD **Bolivia**-No tengo conocimiento., **Bulgaria**-NR, **Colombia** 7250.26, **France** 0, **Germany**-NR, **Japan (Horiuchi Trading Co.)**- Not applicable to Japan because Japan has never issued tags, **Mexico**-NR, **Singapore**-NR, **Switzerland**-NR, **Thailand**-NR, **United States**-USD\$20,000, not including state administrative costs, **Zambia**-2,000.

4.1.3. Do you recover these costs from the trade?

Bulgaria-NR, Japan (Horiuchi Trading Co.)-NA.

☐ Yes (if yes, please explain) **Bolivia** – El costo de los precintos los pagan los exportadores. **France**- Tags are paid by companies upon delivery. **Germany**-In Germany it is always the Management Authority that orders the tags which are afterwards only delivered to the MA after the private sector has paid directly upon receipt of the invoice the tag costs to the tag manufacturing company which then delivers the tags only to the CITES MA. This procedure has been chosen to be faster and more flexible in financial and budgetary issues within the government agency that host the CITES MA. **Mexico. Switzerland**-tags are sold to the trade. **Thailand**-because it is a cost of product. **Zambia**-each tag is sold for 5 USD.

☐ No – **Colombia, Singapore, United States**

4.1.4. Is the universal tagging system for the identification of crocodilian skins in its current form necessary for the effective control of trade in crocodilian skins?

☐ Yes, very necessary – **Ashley Associates-U.S. alligator industry**- Universal tagging is very necessary to the effective control of trade in crocodilian skins. It provides the basis for sustained use management (harvest quotas, harvest areas,) international control of import/export and a means of trade monitoring through CITES Annual Reports. **Bolivia, Bulgaria, Colombia, Germany, Japan (Horiuchi Trading Co.), Mexico, Switzerland, Zambia**

☐ Yes, somewhat necessary – **France, Singapore, Thailand, United States**

☐ No

4.1.5. Are there elements of Resolution Conf. 11.12 that are not necessary or in need of revision for the effective control of crocodilian skins?

☐ Yes (if yes, please explain) – **France**-Consider other tagging methods such as barcodes or microchips. **Germany**- See amendments made or comments added in correction mode in document Resolution Conf. 11.12 that is transmitted together with this questionnaire. **United States**

☐ No – **Bolivia, Bulgaria, Colombia, Japan (Horiuchi Trading Co.), Mexico, Singapore, Switzerland, Thailand, Zambia**

4.1.6. Are you aware of any fraud or other illegal activity associated with the universal tagging system for the identification of crocodilian skins, such as fraudulent tags, re-using tags, etc.?

☐ Yes (if yes, please explain) – **Bolivia**-Una ex autoridad de la DGBAP estuvo acusada de venta de precintos. **Germany**- There were cases in the past concerning shipments of caiman skins from Latin American countries where tags produced by the US based Brooks Company had been manipulated and re-used due to an insufficient and easy to open lock. This has for example triggered the CITES Management Authority from Colombia to produce their own more fraud resistant tags through the CITES Secretariat notified company "ALPHEX, Industrias Plásticas". A description (in Spanish only) of these highly manipulation proof tags which require a special tool to be affixed upon a crocodilian skin is transmitted together with this questionnaire. **Mexico. Thailand**-because it is an effectiveness method to control.

☐ No – **Bulgaria, Colombia, France, Japan (Horiuchi Trading Co.), Singapore, Switzerland, United States, Zambia**

4.1.7. How many commercial shipments of crocodilian skins resulted in CITES violations (e.g. no tags, incorrect species, no export/re-export permit certificate, etc.) in 2007? **Bolivia**- (NR), **Mexico**- (NR)

☐ 0-10 – **Bulgaria, Colombia, France, Germany, Japan (Horiuchi Trading Co.), Singapore, Switzerland, Zambia**

☐ 11-25 – **Thailand, United States**

☐ 26-50

☐ 51-100

☐ More than 100

5. Other Issues

5.1. Is there any other information not requested above that you wish to share about ways and conditions to improve the implementation and effectiveness of the universal tagging system for the identification of crocodilian skins?

Ashley Associates-U.S. alligator industry-The primary improvement would be to eventually incorporate bar-coding on tags to improve the accuracy and handling of skins. **Bolivia-NR. Bulgaria-NR. Colombia-NR. France-NR. Germany-** There could be a need to review CITES Notification 2004/063 in case some of the companies approved through this Notification are not improving the physical characteristics of their tags such as the one produced by Brooks which can easily be re-opened by use of hot water and consecutively be reclosed. **Japan (Horiuchi Trading Co.)-NR. Mexico-NR. Singapore-NR. Switzerland-NR. Thailand-NR. United States**-Often, 100% of skins from Singapore have replacement tags. Are re-export tags an adequate means of controlling/ monitoring tags (U.S. has 25% rule for replacement tags)? Why is there not a tag requirement for re-exported parts? **Zambia-NR.**