

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



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IMPLEMENTATION AND EFFECTIVENESS OF THE UNIVERSAL TAGGING SYSTEM
IN THE TRADE IN SMALL CROCODILIAN LEATHER GOODS

The attached document was submitted by the Animals Committee representative in the Standing Committee Working Group reviewing the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather goods (Mr Dietrich Jelden, Germany).*

* *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.*

REPORT OF THE ANIMALS COMMITTEE REPRESENTATIVE IN THE STANDING COMMITTEE
WORKING GROUP REVIEWING THE IMPLEMENTATION AND EFFECTIVENESS OF THE
UNIVERSAL TAGGING SYSTEM AND THE TRADE IN SMALL CROCODILIAN LEATHER GOODS

1. This document has been prepared by the representative of the CITES Animals Committee in the Standing Committee's Working Group (SC WG) which was established to review the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather products.
2. Decision 14.62 concerning the Review of the universal tagging system and trade in small crocodilian leather goods determines that:

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.

3. The Animals Committee selected a representative for the Standing Committee's Working Group reviewing the implementation and effectiveness of the universal tagging system and the trade in small crocodilian leather goods at its 23rd meeting held in Geneva 19-24 April 2008.
4. Following its nomination the AC representative drafted in early August 2008 a document on 'preliminary considerations to guide the CITES SC WG's activities on the implementation of Decision 14.62 and 14.63' (see **Annex 1**).
5. The draft document was circulated by the Chair of the Animals Committee on 8th August to all members of the Animals Committee (AC) together with a request to comment and review the draft. As no comments were received by members of the Committee but only two minor additional comments from alternate members the AC approved the draft strategy which was conveyed to the chair of the SC WG in early September.
6. Based on the AC approved draft strategy the chair of the SC's WG drafted a slightly amended strategy which largely was the same as the one which the AC had approved. The SC WG adopted the chair's proposal on a strategy to guide its future work.
7. On 24th September the AC representative in the SC's WG reported back to the Chair of the AC who accordingly informed the Committee on recent developments in the SC's WG.
8. On 29th September and in accordance with the SC's WG's strategy the AC representative prepared a draft revision of Resolution Conf. 11.12 ('Universals tagging system for the identification of crocodilian skins') which was circulated by the chair of the AC among its members. Following a few comments received by members of the AC a draft of an amended Resolution Conf. 11.12 (see **Annex 2**) was conveyed to the Chair of the SC's WG for further action as required. However the Chair of the SC's WG decided that at this stage of the process any discussion of an amendment of Res. Conf. 11.12 should be postponed until responses were received on two questionnaires to be circulated by the Chair which among others should also help to focus on specific problems associated with the implementation of Res. Conf. 11.12.
9. On 6th October the Chair of the SC WG suggested among others that France, Switzerland and Germany prepare an issue paper on what is meant by the term 'small crocodilian leather goods' to allow the WG to agree on a common definition of this term embedded in CITES Decision 14.62.
10. On behalf of Germany the AC representative in the SC WG agreed to coordinate the drafting of such an issue paper (see **Annex 3**) which was conveyed to the Chair of the SC WG on 20 October for further discussion in the SC WG. However it was pointed out to the Chair of the SC WG that the

drafting group had reached consensus on all items except with regard to the size limitation for small crocodilian leather products.

11. As recommended in the SC WG's strategy document on how to implement Decisions 14.62 and 14.63 the Chair of the SC WG drafted and circulated at the end of January 2009 two questionnaires which had been translated into all of the Convention's languages. One of the questionnaires is trying to assess how parties cope specifically with trade in large amounts of small leather products whereas the second is focusing on the overall implementation and effectiveness of Resolution Conf. 11.12 on the universal tagging system for the identification of crocodilian skins and how the resolution might be improved or streamlined.
12. At the time of writing this report an evaluation of any responses on the questionnaire had not yet been undertaken.

Annex 1

Preliminary strategic considerations to guide the CITES Standing Committee's Working Group's activities on implementation of CITES Decisions 14.62 & 14.63

prepared by the

CITES Animals Committee's representative for the Standing Committee's Working Group,
Dr. Dietrich Jelden (CITES MA of Germany)

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

Decision 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.*

Decision 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 established a working group on Trade in Crocodilian Specimens which includes representatives from Parties, NGO's, private sector companies involved with experience in tag production and tag application through different processing stages, intergovernmental organizations such as IUCN 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 **general implementation of the universal tagging system** for the identification of crocodilian skins **and its effectiveness** as embedded in CITES Resolution Conf. 11.12 following approaches could be taken:
 - a) Exemplary assessment what experience certain CITES parties with large crocodilian skin productions (USA, Colombia, Zimbabwe, Australia etc.) and the private sector (tanners, skin traders and other industry groups) with the implementation of the tagging system have made and how in particular CITES parties have developed streamlining and facilitating procedures to cope with CITES provisions in Res. Conf. 11.12. Here the development of a questionnaire could assist to standardize the data collection. The questions of the questionnaire could in particular refer to problems likely associated with the implementation of following paragraphs in the operational part of CITES Resolution Conf. 11.12: c), d), e), f), g), l) and m).

- b) After assessment and evaluation following provisions could likely be changed:
 - c) 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;
 - d) Possible recommendations to amend CITES Resolution Conf. 11.12 **pre-ambular paragraph 6 and 8**;
 - e) Possible recommendations to amend CITES Resolution Conf. 11.12 **operational paragraph c), d) and e)** (information structure and physical characteristics of tags). With regard to physical characteristics a consultation with wildlife departments applying tags and skin tanners are required which again could be done through the questionnaire mentioned in the first indent above. In particular the persisting problem that some of the most wide spread tags (e.g. manufactured by the US based Brooks Company) can easily be re-opened under hot water and re-closed afterwards needs to be addressed and solved to prevent abuse.
 - f) Possible recommendations to amend CITES Resolution Conf. 11.12 **Annex 2** paragraph 3) referring to CITES Management Authorities to provide information to Secretariat on details of each tag order.
 - g) Possible recommendation to overall review Resolution Conf. 11.12 with regard to redundancies.
 - h) Many CITES Parties tag crocodylian skins immediately when processed from a dead animal. Some parties remove these tags before tanning the skins and replace the tags as appropriate with export tags after the skins had been tanned. This procedure leaves however ample scope for abuse in particular to launder through tanneries illegal skins. The question is whether the WG might wish to add a new paragraph in Resolution Conf. 11.12 which refers to a procedure that tags must remain intact with the skins even during tanning processes irrespective of whether this concerns an internal enforcement and compliance mechanism and not necessarily an international trade issue
4. In order to examine the implementation and effectiveness of issuing CITES documents for small crocodylian leather goods and related trade controls following approaches could be taken:
- a) It would be useful to find a definition of what the term 'small leather product' does mean (watchstraps, key-attachments and credit card holders only or does this also more unsuitable include money purses, belts, wallets etc.).
 - b) An exemplary assessment among those CITES parties which produce and trade in large amounts small crocodylian leather products and in how they effectively issue their CITES permits (France, USA, Switzerland, Germany, Italy, Japan etc.) could be a way forward. Here again the questionnaire mentioned in the first indent above could be used to inquire about this information. In addition such an exemplary assessment should also include questions in relation to how these parties conduct and implement trade controls effectively on small crocodile leather products.
5. Finally the way forward how the SC Working Group could consider possible ways and conditions to alleviate administrative burdens related to trade in small crocodylian leather goods by still guaranteeing the legal origin of the specimens could be as follows:
- a) Introduction of effective electronic permitting systems including electronic application schemes;
 - b) use of blanket and already pre-signed CITES permit forms along the lines as provided in CITES Resolution Conf 12.3 Rev. CoP 14) on 'Permits and Certificates' Annex XII on '**use of simplified procedures to issue permits and certificates**'. Along this line Annex IX of Resolution Conf 12.3 (Rev. CoP14) '**Regarding permits and certificates for crocodylian specimens**' could be amended;
 - c) considering of the delisting of certain crocodylian species or selected populations from CITES Appendix II which do not meet anymore the requirements as laid down in CITES Resolution Conf. Conf. 9.24 (Rev. CoP14) 'Criteria for amendment of Appendices I and II' and unilateral

transfer to CITES Appendix III in order to maintain still some control with the possibility of introducing standardized private sector certification schemes for the products.

Annex 2

Resolution 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, **unsustainable and unregulated** 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 in the past is not the only problem. Illegal trade is always a problem and can happen anytime. Therefore change from past into present tense is recommended.*

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~~ **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);~~

COMMENT: *These resolutions to which reference is made here aren't in effect anymore and mentioning them here is now redundant.*

~~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 Conference of the Parties and its further improvements made at consecutive meetings of the CoP this paragraph which doesn't say much at all has become now 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: *The deletion of this preambular paragraph is recommended because it is out of context and to some extent contradictory to the objectives of this resolution by saying we have established a marking system to improve the trade situation (legality and sustainability) but the system is not quite perfect.*

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 **or similarly secure and non-reusable methods** to all crocodilian skins entering international trade from the countries of origin;

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

COMMENT: *By adding some new wording would allow parties some more flexibility and provide incentives to develop new and possibly superior tagging methods to those currently applied.*

- b) that crocodilian **belly or hornback** skins, **chalecos** and flanks be individually tagged by **serial identification numbers** and that ~~chalecos have attached a tag to each side (flank) before export;~~

COMMENTS:

1. One caiman produces two flanks. The question here with regard to tagging flanks from one individual is whether the numbering on the tags would be different or the same which would ensure that both flanks came from the same animal. In order to better cope with fraudulent trade the same numbering would be preferable. However this would be associated with significant additional administrative burdens. Consecutive numbering would from an administrative point be easier to handle. In conclusion here some more precise wording would be helpful such as for example to add after the word 'tagged' the words '...by serial identification numbers'.

2. The double tagging of chalecos (skin frames from caimans) was introduced because after export these skins were cut in the middle and resulted in two flank skins which than would already have export tags attached. The question for the SC Working Group would be whether such double tagging is still required or whether a single tag would be sufficient. If only one tag would be acceptable, which is the proposed way forward here because of little or no fraud associated with this trade commodity over the years than the wording of this paragraph should be changed.

- 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 production or harvest **of skins**, 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 **uniquely** 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 is a need to clarify what the term 'year of production' means, i.e. whether it refers to the production of eggs, hatchlings or skins. From a rational point it should mean 'year of production of skins', i.e. the year when the skinning was done. The term as it stands currently is definitely too vague and would require specification. Some of the tags currently in use such as the Brooks tags can be manipulated, re-opened and perfectly re-closed if put under hot water. In order to prevent such fraudulent use in future it would be useful to add the word 'uniquely' to the term 'self locking mechanism'. In order to relieve their administration from old fashioned data management procedures some parties consider of introducing or have already introduced bar-coding on the tags. An amendment to endorse such a new development would therefore be helpful.*

- d) that the year of production **of the skins** and **the** serial number be separated with a hyphen (-) where the information on tags appears in the sequence: country of origin, year of production, serial number, species code;
- 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 together with a description of the content, **the number of skin pieces** and total weight, and all the information required for tags for individual skins, flanks and chalecos, as outlined in paragraphs c), d) and e);

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

COMMENT: *It would be useful to improve the quality of the description of the content of the container by adding the number of skin pieces which would help to reduce attempts of fraudulent practices.*

- 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 or removed from raw, tanned, and/or finished skins and flanks, the country of re-export should tag each such skin or flank 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 production and/or harvest **of the skins** 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;
- ~~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: *The maintenance of this paragraph shall be seriously questioned. If at all it is now rather unlikely that major stockpiles of skins that pre-date entering into effect of Resolution Conf. 9.22 (i.e. 1995) are still available on world wide reptile skin markets.*

- 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;

COMMENT: *Without changing the sentiments of operative paragraph k), it would be useful to review the language in this paragraph as it could be interpreted as being in conflict with trade suspensions that may be recommended by the Standing Committee with respect to national population[s] of an Appendix II species that have been subject to significant trade recommendations.*

- 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 chalcos 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.~~

COMMENT: *The last operational paragraph should be deleted as both resolutions (Conf. 6.17 and Conf 9.22) mentioned here have been repealed and now replaced by Res. Conf. 11.12.*

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</i>	JOH
<i>Crocodylus moreletti moreletii</i>	MOR
<i>Crocodylus niloticus</i>	NIL
<i>Crocodylus novaeguinae mindorensis</i>	MIN
<i>Crocodylus novaeguinae novaeguinae</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: Correction needed following adopted CITES nomenclature

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;*
 - 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 **on request** of the details of each tag order.

COMMENT: *There is probably no need to provide the information on each tag order but only in cases where the Secretariat or other bodies of the Convention have reasons for doubt.*
4. Upon request by a Management Authority, the Secretariat should purchase and distribute tags for crocodilian skins, and should recover the full cost, except if external funding becomes available for Parties requiring assistance.
5. 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. 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 immediately after issuance or receipt as appropriate.
7. Parties that require or intend to require the use of tags for containers should send to the Secretariat at least one sample tag for reference.

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).*

Annex 3

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 had 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 essentially consists of re-exports. According to the CITES 2004 annual reports, the contribution of exports to 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) was 3.5 % only, while the part of re-exports amounted to 96.5 %.

In addition, 85 % of the exported LPS specimens produced out of crocodilian leather (i.e. 85 % of 3.5 % of the worldwide trade in the considered specimens) originate nowadays either from captive-breeding or ranching operations (sources C, D or R). If one refers to re-exported specimens, this rate increases even to 92 % of the respective trade. About 99.5 % of this trade comprises specimens that originated from skins produced either at captive breeding or ranching operations. Therefore in conclusion this trade cannot be considered as having any negative impact on the conservation of the crocodilian species concerned.

Furthermore all the 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 compulsory trade provisions of the Convention including those embedded in CITES Resolution Conf. 11.12 (Universal tagging system for the identification of crocodilian skins).

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 under contract by the UNEP-WCMC. This trade is today well and effectively regulated and the greatest part of the formerly flourishing illegal skin trade has now been eliminated. In fact, it 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, CITES Parties in which the leather products under consideration are manufactured and traded are obliged to issue tens of thousands of re-export certificates for such specimens each year. Since several years even though 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 the quantity of these CITES documents have continually increased, especially because some stages of the manufacturing process are carried out in third countries, which implies several successive re-exports and re-imports for one and the same specimen.

The huge quantity of CITES documents to be issued which among several Parties can amount from a couple of ten thousand up to hundred thousand documents and more annually 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 together with their data management makes the transactions unnecessarily more expensive and time consuming.

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

undertaken within the available legal scope the Convention provides for 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 be laid only on this commodity. However a readily by CITES enforcement officials implementable definition of the term '***small crocodilian leather product***' is warranted. The **ANNEX** to this document provides several options for such a definition whereas 'Option No 3' seems to offer the most practical way forward.

ANNEX

Definition of the Term 'Small Crocodylian Leather Product'

1. Explicit Definition

Small leather products are manufactured goods made of crocodylian leather. Specified by name small leather products are 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 includes in addition braces, handbags, notebooks, shoes, wallets
 - 2000cm² includes 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.*
- *Ornaments or applications of crocodylian 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

Attachment II: Visualisation of 100cm²

