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OF WILD FAUNA AND FLORA

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OVERVIEW OF TRADE IN *CROCODYLUS NILOTICUS*  
FROM MADAGASCAR DURING THE PERIOD 2006-2011

This document has been submitted by the Secretariat in relation to agenda item 13 on *Ranching operations in Madagascar*.

**Overview of trade in *Crocodylus niloticus*  
from Madagascar during the period 2006-2011**

CITES Secretariat

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(final draft, unedited)

## Acknowledgments

Earlier drafts of this report were prepared by UNEP-WCMC<sup>\*</sup> under its general contract with the Secretariat to maintain the CITES Trade Database and otherwise provide trade monitoring support. The involvement of UNEP-WCMC was envisaged in document SC62 Com. 5.

The report is based on information from the CITES Trade Database, which comprises annual reports submitted by Madagascar and other Parties.

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<sup>\*</sup> *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.*

OVERVIEW OF TRADE IN *CROCODYLUS NILOTICUS* FROM MADAGASCAR  
DURING THE PERIOD 2006-2011

A recommended suspension, agreed by the Standing Committee at its 60th meeting (Doha, March 2010), has been in place for trade in *Crocodylus niloticus* from Madagascar since 17 June 2010 (Notification to the Parties No. 2010/015). This report responds to Recommendation No. 3 of document SC62 Com. 5 (paragraph 9), agreed by the Working Group on Ranching Operations in Madagascar and endorsed by the Standing Committee, which stated that the Secretariat should request assistance from UNEP-WCMC to:

- i) compile a comparative review of trade in Nile Crocodile between Madagascar and other Parties (for a period of time including years before the recommended trade suspension was put in place as well as years afterward, and
- ii) identify any potential discrepancies which would need clarification from Madagascar.

As envisaged in Recommendation No. 3, the Secretariat will communicate to Madagascar the review and related requests for clarification in a timely manner for it to be able to reply ahead of SC63.

In response to the recommendation of the Standing Committee, this report presents an overview of all trade in *C. niloticus* (re-)exported from Madagascar during 2006-2011. The report identifies potential anomalies in trade, aims to understand the origin of those anomalies where possible, and where explanations are not clear, provides a list of unresolved reporting issues for Madagascar to address (see Annex 2).

An overview of all trade in *C. niloticus* (re-)exported from Madagascar between 2006 and 2011 is included in Annex 1 (Tables A and B). Direct trade from Madagascar decreased from an average of 4,522 skins and 702 leather products per year between 2006 and 2009 (as reported by Madagascar and importers) to 368 skins and zero leather products in 2011 (as reported by Madagascar?). In view of the recommended trade suspension by the Standing Committee that was notified on 17 June 2010, the focus of this review is on the trade in 2010 and 2011 (both direct and indirect trade). Annex 1 to this report contains trade statistics for the period 2006-2011.

*Direct trade from Madagascar, 2010-11*

In 2010, Madagascar reported the direct export of 51 small leather products and importers reported the import of various items, including 550 skins and 89 bodies (Table 1).

**Table 1. Direct exports of *Crocodylus niloticus* from Madagascar in 2010.**

Importer	Source	Term	Reported by Exporter	Reported by Importer
China	C	small leather products	5	
France	C	small leather products	40	
Italy	C	Bodies		89
		Skulls		1
Japan	W	Skins		50
	C	Skins		500
Russian Federation	C	small leather products	6	
United States of America	I	derivatives		2

Madagascar and Italy did not provide permit issue dates relating to the trade in Table 1, so it was not possible to determine whether these transactions occurred before or after the trade suspension was in effect (see Annex 2, Potential Discrepancies 1 and 2). However, for those importers that provided permit issue dates (the United States and Japan), permits were cross-checked to determine whether the trade took place before or after the suspension was introduced.

The trade reported by the United States was reported to have occurred after the trade suspension was introduced (date of transaction: 11/11/2010); however, this trade was recorded as source 'I' (seizure/confiscation). Imports were reported by Japan with two separate export permits with numbers indicating that they were issued by Madagascar in 2009 (686C-EA12/MG09 and 752C-EA12/MG09); export permit numbers 0686C and 0752C were reported by Madagascar in its 2009 annual report with corresponding quantities. These transactions therefore do not appear to be in contravention of the suspension and occurred before the relevant date.

In 2011, the only direct trade in *C. niloticus* from Madagascar was the report of 368 skins and 357 skin pieces reported imported by Madagascar from itself (e.g. Madagascar as the country of import and the country of export) (Table 2).

**Table 2. Direct exports of *Crocodylus niloticus* from Madagascar in 2011 (all were reported as imports by Madagascar).**

Source	Term	Quantity
C	skin pieces	42
	skins	334
R	skin pieces	315
	skins	34

Madagascar did not provide an export permit number for these transactions. It is not clear whether these records represent internal trade within Madagascar or whether there was an error in the country of export reported by Madagascar. Therefore, clarification from Madagascar is needed on this point (see Annex 2, Potential discrepancy 3).

*Indirect trade from Madagascar, 2010-2011*

All re-exports of *C. niloticus* by Madagascar in 2010-2011 were re-exported to France (Table 3). Some trade originated in Madagascar and was subsequently re-exported by Madagascar which reflects processing done on the products in Madagascar (see Annex II, Potential discrepancy 4). With respect to this trade, the majority of the imports were reported by France with Madagascar origin permit numbers indicating a date of issue between 2005 and 2009. There were three exceptions to this – one transaction in 2010 and two transactions in 2011.

In 2010, there was a shipment of 210 small leather products (reported by France with export permit 686C-RA12/MG10) reported with two origin permit numbers: one relating to 2006 (510C-EA08/MG06) and the other to 2010 (145C-IA04/MG10). It is not clear from France's report whether the whole shipment of 210 small leather products was exported originally in 2006 or whether some of the leather products were exported for the first time in 2010 (on permit 145C-IA04/MG10) (see Annex 2, Anomaly 4). No issue date for these permits was reported by France. The re-export of 210 leather products was reported by Madagascar (with origin Madagascar), but no export permit details were provided. Therefore, it is not clear whether the 2010 permit was issued after the 17 June 2010. When attempting to cross-check the original export permits in the sections above, it was noticed that the four digit permit numbers provided by Madagascar in their annual reports to CITES do not appear to be unique as the same number might be used for an import, an export and a re-exports (see Annex 2, Discrepancy 4). If this is the case, it is recommended that Madagascar provides the full unique permit number within their annual report to CITES as opposed to the four digit shortened version for purposes of cross-checking permits in future. There also appeared to be different source codes used by Madagascar and France (ranchered versus captive-bred) (see Annex 2, Potential discrepancy 4). Although source codes for particular trade do not need to match, perhaps Madagascar could explain the differing interpretations.

In 2011, two shipments were reported by France with an origin permit number in a format that does not indicate the year of issue (0347/MEF/DEF/SEFLFB/FI/AUT; 0347/MEF/DEF/SEFLFB/FI/AUT); again, no issue date for these permits was provided by France and Madagascar did not provide any origin permit details (see Annex 2, Potential discrepancy 5). Without clarification from Madagascar, it is not possible to determine whether the original transactions occurred before or after the trade suspension was in effect.

**Table 3. Re-exports of *Crocodylus niloticus* from Madagascar to France, 2010-2011 (all re-exports were to France in 2011).**

Re-exporter	Importer	Country of origin	Source	Term	Reported by	2010	2011	Total	
Madagascar	France	Colombia	C	small leather products	Madagascar	190		190	
					France	190		190	
		Kenya	C	small leather products	Madagascar			155	155
					France			155	155
			R	small leather products	Madagascar			115	115
					France			115	115
		Madagascar	C	Bodies	Madagascar				
					France	30		30	
			small leather products	Madagascar	277	722	999		
				France	1361	722	2083		
				R	small leather products	Madagascar	1333	140	1473
				France	276	140	416		
			South Africa	C	small leather products	Madagascar	84	370	454
						France	18	370	388
			Zambia	R	small leather products	Madagascar	31	14	45
						France	31	14	45
		Zimbabwe	W	small leather products	Madagascar	470		470	
					France	11		11	
			C	small leather products	Madagascar	4543	6873	11416	
					France	5021	7160	12181	
R	small leather products	Madagascar	22		22				
		France		90	90				

Table 3 above shows a few potential discrepancies in reporting between Madagascar and trading partners. Where reported imports exceed reported (re-)exports, these cases have been highlighted in yellow throughout the document and in Annex 1. In summary, there are certain discrepancies in the trade data reported by Madagascar and its trading partners. Such discrepancies are rather common in comparative reviews of CITES trade data and can often be explained. In several cases, however, it is important to clarify with Madagascar whether trade occurred before or after the trade suspension for *C. niloticus* came into effect.

## Annex 1

**Table A. Direct exports of *Crocodylus niloticus* from Madagascar, 2006-2011. Discrepancies in reporting of note (e.g. where imports are higher than exports) are highlighted in yellow.**

Importer	Source	Term (unit)	Reported by	2006	2007	2008	2009	2010	2011	Total
Australia	R	small leather products	Exporter	182						182
			Importer							
Belgium	C	small leather products	Exporter	2						2
			Importer							
China	C	small leather products	Exporter					5		5
			Importer							
Comoros	R	small leather products	Exporter			22				22
			Importer							
Czech Republic	C	small leather products	Exporter	42						42
			Importer							
France (including Réunion)	W	oil	Exporter	0.25						0.25
			Importer							
		specimens	Exporter		10					10
			Importer							
	C	bodies	Exporter			2	30			32
			Importer			2				2
		bones	Exporter							
			Importer				43			43
		derivatives	Exporter				43			43
			Importer							
		skins	Exporter	2010	2600	760	500			5870
			Importer	1510	2600	1250	950			6310
		skulls	Exporter	3	420	1				424
			Importer		420	2				422
		small leather products	Exporter	113	414	578	952	40		2097
			Importer	83	442	358	139			1023
		specimens	Exporter				8			8
			Importer							
	R	bodies	Exporter	10						10
			Importer	10						10
		large leather products	Exporter							
			Importer	5						5
		skins	Exporter	1000	1350	1000				3350
			Importer	1500	1350	1050	50			3950
		small leather products	Exporter	329	50	713				1092
			Importer	261	50	178				489
Germany	C	small leather products	Exporter			124	436			560
			Importer			71	820			891
	R	small leather products	Exporter			33				33
			Importer							
Italy	C	bodies	Exporter	45						45
			Importer	10	45			89		144
		large	Exporter							

Importer	Source	Term (unit)	Reported by	2006	2007	2008	2009	2010	2011	Total
		leather products	Importer	52			1			53
		skins	Exporter			30				30
			Importer			30				30
		skulls	Exporter	3067						3067
			Importer	634	2432	3000		1		6067
		small leather products	Exporter	100	9	308	47			464
			Importer	207			52			259
		specimens	Exporter				2			2
			Importer							
	R	large leather products	Exporter							
			Importer				1			1
		small leather products	Exporter			48				48
			Importer			27	14			41
Japan	W	skins	Exporter	750	750	150	250			1900
			Importer	1150	200	650	250	50		2300
	C	skins	Exporter	550	800	400	1200			2950
			Importer	350	800	400	850	500		2900
	R	skins	Exporter	2350	50	300	500			3200
			Importer	2000	350	300	499			3149
		small leather products	Exporter	13		2				15
			Importer	7						7
Mauritius	C	small leather products	Exporter	78	53	278				409
			Importer							
Madagascar	C	skin pieces	Exporter							
			Importer						42	42
		skins	Exporter							
			Importer						334	334
	R	skin pieces	Exporter							
			Importer						315	315
		skins	Exporter							
			Importer						34	34
Mauritius	C	small leather products	Exporter	78	53	278				409
			Importer							
Norway	C	small leather products	Exporter				16			16
			Importer							
Russian Federation	C	skins	Exporter		2					2
			Importer							
		small leather products	Exporter			39	47	6		92
			Importer							
	C	small leather products	Exporter				80			80
South Africa			Importer							
Spain	W	small leather products	Exporter	2						2
			Importer							
Switzerland	C	small leather products	Exporter							
			Importer			6				6
	R	small leather products	Exporter			4	12			16
			Importer				10			10



Importer	Source	Term (unit)	Reported by	2006	2007	2008	2009	2010	2011	Total
United Kingdom	C	small leather products	Exporter				268			268
			Importer							
United States of America	W	large leather products	Exporter							
			Importer		1					1
		small leather products	Exporter							
			Importer		1					1
	C	small leather products	Exporter	14						14
			Importer	10						10
	R	small leather products	Exporter			23				23
			Importer							
	U	large leather products	Exporter							
			Importer		1					1
small leather products		Exporter								
		Importer		4					4	
I	derivatives	Exporter								
		Importer					2		2	
	small leather products	Exporter								
Importer	C	small leather products	Importer		4					4
			Exporter				7			7
Unknown	R	small leather products	Exporter	351						351
			Importer							

Table B. Re-exports of *Crocodylus niloticus* from Madagascar, 2006-2011 (all trade was to France).

Re-exporter	Importer	Country of origin	Source	Term	Reported by	2006	2007	2008	2009	2010	2011	Total
Madagascar	France	Colombia	C	small leather products	Madagascar					190		190
					France					190		190
Madagascar	France	Kenya	C	small leather products	Madagascar						155	155
					France			10		155	165	
		Madagascar	R	small leather products	Madagascar				10		115	125
					France					115	115	
Madagascar	France	Madagascar	C	bodies	Madagascar							
				France				30		30		
		Madagascar	C	small leather products	Madagascar					277	722	999
					France			40	1361	722	2123	
Madagascar	France	R	small leather products	Madagascar				1333	140	1473		
				France				276	140	416		
Madagascar	France	Malawi	C	small leather products	Madagascar							
					France			14			14	
Madagascar	France	C	small leather products	Madagascar				7	84	370	461	
				France				7	18	370	395	
Madagascar	France	South Africa	R	small leather products	Madagascar					31	14	45
					France					31	14	45
Madagascar	France	Zambia	R	small leather products	Madagascar							
					France							
		Zimbabwe	W	small leather products	Madagascar		480		5	470		955
					France					11		11
Madagascar	France	Zimbabwe	C	skin pieces	Madagascar	28						28
				France								
		Zimbabwe	C	small leather products	Madagascar	761		726	1763	4543	6873	14666
					France	281	483	726	1609	5021	7160	15280
Madagascar	France	R	small leather products	Madagascar					22		22	
				France						90	90	
Madagascar	France	Unknown	C	small leather products	Madagascar				40			40
					France							

## Annex 2: Potential discrepancies in reporting

**Potential discrepancy 1: Direct exports in 2010 reported by Madagascar.** In Madagascar's 2010 annual report, Madagascar reported the direct export of 51 captive-bred small leather products in 2010. This trade was not reported by importers. It is not known whether the trade took place after the trade suspension for *C. niloticus* from Madagascar came into effect (17 June 2010).

**Question 1:** For each of the transactions below, what was the date of export? (please provided in column in green)

**Question 2:** What were the export permit numbers relating to the transactions highlighted in blue?

**Table C. Direct exports of *Crocodylus niloticus* reported by Madagascar in 2010.**

Importer	Exporter's Reported Quantity	Importer's Reported Quantity	Term	Purpose	Source	Export permit (reported by Madagascar)	Date of export
China	3		small leather products	T	C	0075C	
China	1		small leather products	T	C		
China	1		small leather products	T	C		
France	26		small leather products	T	C	0082C	
France	4		small leather products	T	C		
France	4		small leather products	T	C		
France	3		small leather products	T	C		
France	3		small leather products	T	C		
Russian Federation	2		small leather products	P	C	0010C	
Russian Federation	1		small leather products	P	C		
Russian Federation	1		small leather products	P	C		
Russian Federation	2		small leather products	P	C		

**Potential discrepancy 2: Direct imports in 2010 reported by Italy.** In Italy's 2010 annual report, Italy reported the import of 89 bodies and one skull in 2010 directly from Madagascar, all from captive sources. It is not known whether this trade took place after the trade suspension for *C. niloticus* from Madagascar came into effect (17 June 2010).

**Question 1:** For each of the transactions below, does Madagascar have a record for this trade? If so, what was the date of export?

**Table E. Imports of *Crocodylus niloticus* directly from Madagascar reported by Italy in 2010.**

Importer's Reported Quantity	Exporter's Reported Quantity	Term	Purpose	Source	Import permit (reported by Italy)	Export permit (reported by Italy)	Date of export
89		bodies	T	C	IT/IM/2010/MCE/01856	0810-EA03/MG10	
1		skulls	T	C	IT/IM/2010/MCE/01856	0810-EA03/MG11	

**Potential discrepancy 3: Direct trade in 2011 reported by Madagascar.** In Madagascar's 2011 annual report, Madagascar reported the import of 357 skin pieces and 368 skins with the export country reported as Madagascar. It is not clear whether these transactions represent internal trade within Madagascar or whether there is an error in Madagascar's annual report.

**Question 1:** For each of the transactions below, can you confirm that Madagascar was both the country of export and the country of import? If the country of export is incorrect, could you please

include the actual country of export? Please provide any other relevant information that might clarify these transactions.

**Table D. Imports of *Crocodylus niloticus* reported by Madagascar as direct imports from Madagascar in 2011.**

<b>Quantity</b>	<b>Term</b>	<b>Source</b>	<b>Country of export</b>
42	skin pieces	C	Madagascar
315	skin pieces	R	Madagascar
334	skins	C	Madagascar
34	Skins	R	Madagascar

**Potential discrepancy 4: Indirect trade from Madagascar to France in 2010 (with Madagascar as both exporter and country of origin).** In 2010, France reported the import of 30 bodies and 1,637 small leather products originating in Madagascar and re-exported via Madagascar. The origin permits reported by France all date from between 2005 and 2009, with the exception of one permit dating from 2010. It is not known whether this trade took place after the trade suspension for *C. niloticus* from Madagascar came into effect (17 June 2010).

**Question 1:** The trade recorded by France indicates that skins, bodies and small leather products are exported by Madagascar and then subsequently imported back into Madagascar and then re-exported again as small leather products. This seems to reflect a practice of sending the leather to another country for processing and then importing for further processing of the products within Madagascar before they are then re-exported as final products? Could Madagascar please clarify this process?

**Question 2:** For the transaction reported under export permit 686C-RA12/MG10 highlighted in blue below, two original export permits were reported; one dating from 2006, the other from 2010 (510C-EA08/MG06 and 145C-IA04/MG10, respectively). Were any *C. niloticus* parts or derivatives shipped for the first time under permit 145C-IA04/MG10 or were all 210 leather products re-exports that were originally shipped in 2006? If there was direct trade in 2010 on permit 145C-IA04/MG10, what was the date of export?

**Question 3:** Trading partners appear to provide longer versions of Madagascar permit numbers (e.g. 686C-RA12/MG10 reported by France as opposed to 686C as reported by Madagascar). Are the four digit permit numbers reported by Madagascar unique or can there be imports, exports and re-exports all using the same four-digit code (e.g. France reports an import with a Madagascar re-export permit of 686C-RA12/MG10 and Japan reports an import with a Madagascar export permit of 686C-EA12/MG09)? Can the same code also be used in different years? If that is the case, can the longer permit number be provided within the annual report to CITES in future?

**Table F. Imports of *Crocodylus niloticus* originating in Madagascar and re-exported by Madagascar to France in 2010, reported by France and Madagascar.**

Importer's Reported Quantity	Exporter's Reported Quantity	Term	Purpose	Source	Import permit (as provided by France)	Export permit (as provided by France)	Origin permit (as provided by France)
210	210	small leather products	T	R	FR1000300803-I	686C-RA12/MG10	510C-EA08/MG06; 145C-IA04/MG10
522		small leather products	T	C	FR1000300358-I	253C-RA06/MG10	709C-IA11/MG08
	522	small leather products	T	R			
535		small leather products	T	C	FR1000300412-I	269C-RA06/MG10	709C-EA11/MG05
	535	small leather products	T	R			
30		bodies	T	C	FR1006900010-I		665C-EA11/MG09
27		small leather products	T	C	FR1007500242-I		666C-EA11/MG09
277	277	small leather products	T	C	FR1000300034-I	011C-RA01/MG10	575C-EA10/MG05
66	66	small leather products	T	R	FR1000300427-I	283C-RA06/MG10	709C-EA11/MG05

**Potential discrepancy 5: Indirect trade from Madagascar to France in 2011 (with Madagascar as both re-exporter and country of origin).** In 2011, Madagascar reported the re-export of 862 small leather products originating in Madagascar to France; this quantity was confirmed by France (Table G). Madagascar did not provide any origin permit details for these transactions. The origin permits reported by France all date from between 2001 and 2006, with the exception of two origin permits with a format that does not indicate the year of issue (see permits in blue below). It is not known whether this trade took place after the trade suspension for *C. niloticus* from Madagascar came into effect (17 June 2010).

**Question 1:** For each of the transactions highlighted in blue below, what was the date of the original export?

**Table G. Imports of *Crocodylus niloticus* originating in Madagascar and re-exported by Madagascar to France in 2011, reported by France (all recorded for commercial purposes 'T')**

Quantity	Term	Source	Export permit (reported by France)	Origin permit (reported by France)	Date of original export
11	Small leather products	R	515C-RA10/MG11	0347/MEF/DEF/SEFLFB/FI/AUT	
8	Small leather products	R	486C-RA10/MG11	0347/MEF/DEF/SEFLFB/FI/AUT	
42	Small leather products	C	178C-RA05/MG11	045C-IA01/MG02	
15	Small leather products	C	261C-RA06/MG11	0703-EA1/MG01	
166	Small leather products	C	116C-RA03/MG11	0703-EAL/MG01-CWO	
4	Small leather products	C	080C-RA03/MG11	307CEA06/MG04	
17	Small leather products	R	007C-RA01/MG11	510CEA08/MG06	
8	Small leather products	R	023C-RA01/MG11	510CEA08/MG06	
7	Small leather products	R	035C-RA02/MG11	510CEA08/MG06	
421	Small leather products	C	104C-RA03/MG11	682CEA10/MG06	
74	Small leather products	C	116C-RA03/MG11	682C-EA10/MG06	
89	small leather products	R	172C-RA05/MG11	703-EAL/MG01-CWO	

**Potential discrepancy 6:** Certain potential discrepancies in reporting between Madagascar and trading partners have been highlighted in the main document and in Annex I (highlighted in yellow).

**Question 1:** Where reported imports (by trading partners) exceed reported (re-)exports (by Madagascar), can Madagascar explain the reason for these potential discrepancies?