

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



Seventy-eighth meeting of the Standing Committee  
Geneva (Switzerland), 3-8 February 2025

Regulation of trade

STOCKS AND STOCKPILES (ELEPHANT IVORY)

1. This document has been prepared by the Secretariat.

Introduction

2. Paragraph 7 of Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* urges Parties in whose jurisdiction there is an ivory carving industry, domestic trade in ivory, unregulated market for or illegal trade in ivory, or where ivory stockpiles exist and Parties designated as ivory importing countries, to ensure that they have put in place comprehensive internal legislative, regulatory, enforcement and other measures to enable a number of actions.
3. Amongst these actions is the maintenance of an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory. Parties concerned are urged to inform the Secretariat of the level of this stockpile each year before 28 February "indicating the number of pieces and their weight per type of ivory (raw or worked); for relevant pieces, and if marked, their markings in accordance with the provisions of the Resolution; the source of the ivory; and the reasons for any significant changes in the stockpile compared to the preceding year" as set out in subparagraph e) of paragraph 7.
4. At the 19th meeting of the Conference of the Parties (CoP19; Panama City, 2022), the Parties renewed two Decisions related to this provision of Resolution Conf. 10.10 (Rev. CoP19) previously adopted at CoP18 and adopted two new Decisions related to ivory stockpile management as follows:

***Directed to the Secretariat***

**18.184 (Rev. CoP19)** *The Secretariat shall:*

- a) *identify those Parties that have not provided information on the level of government-held stockpiles of ivory and significant privately held stockpiles of ivory within their territory or where stockpiles are not well secured and report to the 77th and 78th meetings of the Standing Committee with recommendations as necessary; and*
- b) *annually publish updated summary data based on the inventories submitted by Parties, disaggregated to regional but not country level, including the total ivory stockpiles by weight.*

***Directed to the Standing Committee***

**18.185 (Rev. CoP19)** *At its 77th and 78th meetings, the Standing Committee shall consider the report and recommendations of the Secretariat in Decision 18.184 (Rev. CoP19) and determine whether any further actions are necessary in the case of Parties who fail to provide annual inventories of government-held stockpiles of ivory and significant*

*privately held stockpiles of ivory within their territory or where stockpiles are not well secured.*

**Directed to Parties**

**19.156**

*Parties are urged to:*

- a) comply with the provisions of paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens concerning reporting on stockpile inventories to ensure the required information is submitted to the Secretariat every year;*
- b) ensure that adequate funding, capacity building and training are available to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of properly.*

**Directed to the Secretariat**

**19.157**

*The Secretariat shall:*

- a) invite Parties, through a Notification, to submit information about available management tools, and new techniques and technologies related to any of the elements mentioned or referred to in the “Practical guidance on ivory stockpile management”; and*
- b) prepare and submit a summary of the responses to the Notification with, as appropriate, draft recommendations relating to the incorporation of new information in the guidance documents or any of the documents referred to in the guidance documents for consideration at the 78th meeting of the Standing Committee.*

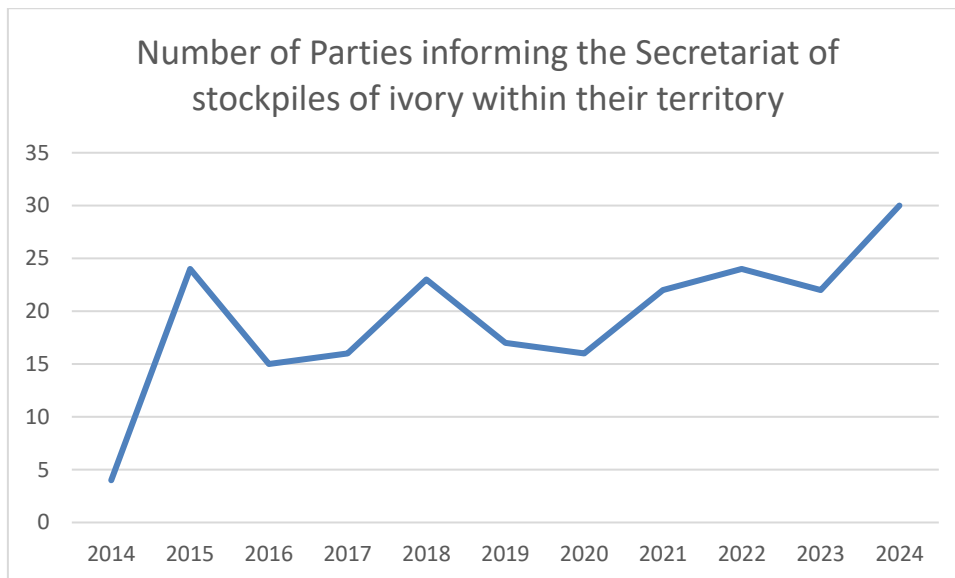
Submission of information by concerned Parties on the levels of ivory stockpiles

5. The Secretariat issues an [annual Notification to the Parties](#) reminding Parties of the obligation to submit information on the level of their ivory stockpiles and associated information, together with a model inventory for doing so. As directed, the Secretariat has published annually on the CITES website a summary of the data based on the inventories submitted by Parties. At the time of writing the present document, [the published summary](#) relates to stockpile declarations for 2023, which were submitted in 2024.
6. The Conference of the Parties has urged concerned Parties to make annual declarations of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory since 2014. Since that time, 52 (28%) Parties and one non-Party have declared their ivory stockpiles for one year or another, but no Party has declared its stockpiles every year. Of those 53 countries, 25 are from the Africa region, 13 from Asia, 11 from Europe, 2 from Oceania, 2 from North America and none from Central and South America and the Caribbean. Four of the 52 Parties have submitted information about privately held stockpiles of ivory since 2014. The number of Parties making ivory stockpile submissions has remained relatively stable, with an increase of Parties reporting in 2024, as shown in Table 1 below. Nine Parties have reported for the first time in 2023 or 2024.

Table 1. Number of Parties informing the Secretariat of stockpiles of ivory within their territory\*.

2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
4	24	15	16	23	17	16	22	24	22	30

\* China and the Hong Kong Special Administrative Region of China have been treated separately as they have made separate submissions.



7. The Secretariat is currently not able to identify all those Parties which are urged to make submissions based on the criteria outlined in paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19). Firstly, the Secretariat does not possess a formal list of those Parties where an ivory carving industry exists, where there is domestic trade in ivory, an unregulated market or illegal trade in ivory, or where ivory stockpiles actually exist. Secondly, the Parties have not agreed on a definition of what constitutes a 'stockpile'. In this regard, reference is made to document SC78 Doc. 53 on stocks and stockpiles submitted to the present meeting.
8. It is difficult to obtain complete information on which Parties appear to have stockpiles of government-held ivory but have never reported such stockpiles. It is even more challenging to make any judgement in relation to significant privately held stockpiles. In this regard, the Secretariat notes the challenges that Parties might face in collecting and making available data concerning privately held stockpiles and notes that only four Parties have reported on privately held stockpiles in the reports submitted in 2024.
9. In relation to government-held ivory stockpiles, inferences about the presence of stockpiles can be drawn from three sources:
  - a) Aggregated data from the Monitoring of the Killing of Elephants (MIKE) reports show that a number of range States which have never declared ivory stockpiles have nonetheless reported finding elephant carcasses in MIKE sites from which ivory was recovered. Some or all of this recovered ivory may have been transferred to government stockpiles. This situation applies to the Central African Republic, India, Nepal and Rwanda. In some of these cases, the number of tusks involved was very small. The Secretariat, through the CITES MIKE programme, initiated awareness-raising sessions on stockpile management to remind the elephant range States about reporting on their stockpiles to the Secretariat and to support them in this action.
  - b) National Ivory Action Plans (NIAPs) – Togo has developed a NIAP which contains measures concerning stockpiles but has never declared ivory stockpiles.
  - c) [Data from the Elephant Trade Information System \(ETIS\)](#) indicates that a number of Parties which have not submitted ivory stockpiles declarations have reported making seizures of ivory during the period 2014 to 2023. It may be that such ivory is subsequently stored by the government of the Party concerned and would constitute a stockpile. This situation applies to Belgium, Brazil, Burkina Faso, Burundi, Canada, the Central African Republic, Cyprus, Czechia, Denmark, Egypt, Estonia, France, Ghana, Guinea, Hungary, India, Ireland, Israel, Jordan, Latvia, Liberia, Myanmar, Nepal, the Netherlands, Niger, Oman, Portugal, Romania, Rwanda, Saudi Arabia, Sri Lanka, Togo, Tunisia, Türkiye, the United Arab Emirates and the United Kingdom of Great Britain and Northern Ireland.
10. Considering the number of cases referred to in paragraph 9 above, it requires significant extrabudgetary resources to systematically follow up on each of the cases. However, with regard to Parties which have reported seizures to ETIS but no information on stockpiles, reference is made to paragraphs 15 and 16 below for a possible explanation.

#### Identification of Parties where stockpiles are not well secured

11. In its document to the 74th meeting of the Standing Committee (SC74; Lyon, March 2022), the Secretariat reported that it had previously identified Burundi as a Party where ivory stockpiles are not well secured based on information provided by the Party in 2004 and on a seizure in Uganda in 2015. It further reported that Burundi had not responded to the letters of the Secretariat or provided any information concerning its ivory stockpiles or any measures taken to ensure that they are well secured.
12. The Secretariat also noted that it had the intention to put in place arrangements to conduct a technical mission to Burundi, in accordance with paragraph 29 e) in the Annex to Resolution Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures*, to verify the current status of the Burundi stockpile, and to report to the Committee on its findings.
13. The Secretariat has made several attempts to engage Burundi on this matter and requested an invitation to undertake a technical mission but has not received any response. The Secretariat has asked Burundi in November 2024 to confirm this but, at the time of writing, no response has been received.
14. The Secretariat has not received any recent information regarding ivory thefts from stockpiles at a significant level or any other information which would warrant the referral to the Standing Committee under Decision 18.185 (Rev. CoP19) of any other Party because their stockpile is not well secured.

#### Definition of stockpiles

15. The Secretariat notes that there seems to be some discrepancies in the understanding of the scope of what should be reported to the Secretariat as government-held elephant ivory stockpiles. Some Parties have indicated that they do not report on the limited quantity of government-held stockpiles because formally confiscated ivory must be destroyed. However, in some cases, this is not happening immediately, and the ivory may be stored for a limited time to be destroyed as part of a larger batch. The understanding is that such a short-term storage of small quantities of ivory does not fall under the scope of the reporting in Resolution Conf. 10.10 (Rev. CoP19). As mentioned above, this may explain the non-reporting of some Parties identified in paragraph 9.
16. In this context, the Secretariat would like to draw the Committee's attention to document SC78 Doc. 53 on *Stocks and stockpiles* and the proposed definition of the terms therein. If the Parties could agree on a definition of the terms, it may also help the Committee in coming to a common understanding of the reporting requirement in Resolution Conf. 10.10 (Rev. CoP19), paragraph 7 e), as well as in other Resolutions. Further, the Secretariat notes that if it does not receive information on destroyed stockpiles, it will continue to identify Parties as potentially holding stockpiles if they have reported seizures to ETIS. The Secretariat does not have the capacity to cross-check information about disposal of ivory stockpiles submitted in the annual illegal trade reports, but such information could address this discrepancy.

#### Other related issues

17. The Secretariat is pleased to inform the Committee that it has developed an ivory stockpile database with the generous support of Switzerland. The Secretariat thanks the Parties that have used the reporting [template](#) that facilitates the upload of the records in the database (see Notification to the Parties No. 2024/019).
18. The Secretariat also notes that, in the communiqué of the CITES Dialogue meeting for African elephant range States, held in September 2024 (see document SC78 Doc. 65.8, Annex 2), African elephant range States propose draft decisions on *Sustainable financing for the conservation and management of African elephants*. These include a call for all Parties to report the status of stockpiles as of December 2024 pursuant to Resolution Conf. 10.10 (Rev. CoP19) to facilitate the development of mechanisms for the sustainable management of elephants and ivory stockpiles.

#### Submission of information on ivory stockpile management

19. In accordance with Decision 19.157, the Secretariat issued Notification to the Parties No. 2024/044 of 12 March 2024 inviting Parties to submit information about available management tools, and new techniques and technologies related to any of the elements mentioned or referred to in the "[Practical guidance on ivory stockpile management](#)". The Secretariat received information from Cambodia, the Democratic

Republic of the Congo, Japan, Senegal, Sweden, Thailand and the United States of America, as well as from the Elephant Protection Initiative.

20. Japan provided an explanation of its registration system for privately held ivory stockpiles, in particular for whole elephant tusks that require radiocarbon dating and for ivory not in the form of whole tusks. The United States of America informed the Secretariat that it had no additional information about available management tools, and new techniques and technologies related to any of the elements mentioned or referred to in the “Practical guidance on ivory stockpile management”. The Elephant Protection Initiative provided updated versions of the documents already included in the guidance and the following three additional documents: [EPI Gold Standards Assessments](#); [Procedures for the Transfer of Wildlife Products](#); and [Storeroom Management Procedures for Wildlife Products](#).
21. The other Parties provided updates on their legal mandates for stockpile management; the attribution of roles and responsibilities; the existence or absence of standard operating procedures (SOPs) for stockpile management; and on financing the stockpile management system. Responses indicated a great variety of practices:
- a) legal mandate for stockpile management: a Party indicated having no specific regulation for managing ivory stockpiles noting that this was part of the management of confiscated articles, while other Parties mentioned specific national legislation and acts, or Ministerial Decisions;
  - b) attribution of roles and responsibilities: in a Party, a total of six Ministries were involved in stockpile management, while in other Parties, just one or two entities were in charge.
  - c) SOPs for stockpile management: some Parties have developed SOPs that cover ivory stock inventory, inter-agency collaboration, data management and reporting, security during transport and at storage facilities, storage staff capacity-building, marking system, and sampling, while others have indicated very limited SOPs or no SOPs. When sampling was mentioned, Parties indicated that they implemented the guidance in Resolution Conf. 10.10 (Rev. CoP19).
  - d) financing the stockpile management system: Only two Parties provided information on financing the stockpile management system: one Party’s system was integrated in the government’s budget; the other Party’s system was financed by external partners, with only the salary of staff being paid by the government.
22. Parties expressed willingness in sharing best practices, but none proposed edits to the “Practical guidance on ivory stockpile management”. For its part, the Secretariat seized the opportunity to update the guidance by revising cross-references, updating broken links and uploading the revised versions of the documents provided by the Elephant Protection Initiative. The Secretariat wishes to consult the Standing Committee whether the additional tools provided by the Elephant Protection Initiative and listed in paragraph 20 above should be included in the “Practical guidance on ivory stockpile management”, in the section on “Security during transport and at storage facilities” under “Further guidance.” Should the Standing Committee agree to their inclusion, this updated version will be included on the [Elephants page of the CITES Website](#), under “Tools and resources”.

<p>→ d. → Security during transport and at storage facilities □</p>	<p>Security at all localities holding part or all of the Government-controlled stockpile as well as during any transport of ivory to and from a stockpile is paramount. The SOP should specify staffing responsibilities and physical mechanisms required to keep the stockpile secure at all times including during transit from one another.¶</p> <p>Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document¶</a></p> <p><a href="#">Elephant Protection Initiative. Gold Standards for the Management of Ivory (and other wildlife products) See also the EPI Gold Standards Assessments.¶</a></p> <p><a href="#">Elephant Protection Initiative. Procedures for the Transfer of Wildlife Products¶</a></p> <p><a href="#">Elephant Protection Initiative. Storeroom Management Procedures for Wildlife Products□</a></p>
---	---

## Conclusions

23. Notwithstanding the efforts of a slightly increasing number of Parties, many Parties either do not declare their government ivory stockpiles or do not declare them every year as urged in paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19). Very few Parties have declared significant privately held stockpiles of ivory to the Secretariat, although there is anecdotal evidence that such stockpiles exist.
24. For the next intersessional period, the Secretariat proposes to incorporate some elements of Decisions 18.184 (Rev. CoP19) and 19.156 and 19.157 in Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* and to delete some other elements as these are already in Resolution Conf. 10.10 (Rev. CoP19). These draft amendments are contained in Annex 1 to the present document.
25. The Secretariat notes that the intent of Decision 18.185 (Rev. CoP19) is to determine whether any further actions are necessary in the case of Parties who fail to provide annual inventories of government-held stockpiles of ivory and significant privately held stockpiles of ivory within their territory or where stockpiles are not well secured. As outlined above, a significant number of Parties fail to provide such annual inventories and it is unclear to the Secretariat what type of actions should be taken in such cases. The Secretariat recalls that Resolution Conf. 14.3 (Rev. CoP19) on *CITES compliance procedures* indicates that only the provisions on the National Ivory Plans process can be considered as part of compliance procedures. With regard the issue of stockpiles not being well secured, the Secretariat notes that this is an issue that is sometimes part of National Ivory Plans (Angola, Cambodia, Cameroon, Congo, Democratic Republic of the Congo, Gabon, Lao People's Democratic Republic, Malawi, Malaysia, Mozambique, Nigeria, Qatar, Togo, Viet Nam) or of Article-XIII processes (Democratic Republic of the Congo, Guinea and Nigeria). A separate Decision therefore would be redundant.
26. The secure management of stockpiles has also become increasingly important for other CITES-listed specimens, beyond ivory, specifically for *Pterocarpus erinaceus*, Malagasy *Dalbergia* spp and *Diospyros* spp., *Paubrasilia echinata*, pangolin scales (*Manis* spp.), saiga horns, shark fins, etc. The Secretariat therefore proposes to move away from tackling single-taxon stockpile issues to a more general one by proposing new draft decisions contained in Annex 2 to the present document that aim to support Parties' efforts.
27. Finally, the Secretariat also proposes the deletion of Decision 19.157 that focuses on the "Practical guidance on ivory stockpile management" as it has been implemented.

## Recommendations

28. The Standing Committee is invited to:
  - a) encourage Parties, in particular African elephant range States, to step up their efforts to implement paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* concerning stockpiles, with a view of submitting the required information to the Secretariat every year;
  - b) invite its regional Members and Alternate regional Members, as part of their regular contact with Parties in their region, to remind Parties of the obligations of paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP19);
  - c) review and submit the amendments to Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens* contained in Annex 1 to the present document to the Conference of the Parties at its 20th meeting;
  - d) review and submit the draft decisions on contained in Annex 2 to the present document to the Conference of the Parties at its 20th meeting;
  - e) agree that Decisions 18.184 (Rev. CoP19), 18.185 (Rev. CoP19), 19.156 and 19.157 have been implemented and can be proposed for deletion;
  - f) invite the Secretariat to include the Elephant Protection Initiative's [Gold Standards Assessments](#); [Procedures for the Transfer of Wildlife Products](#); and [Storeroom Management Procedures for Wildlife Products](#) in the "Practical guidance on ivory stockpile management" and publish it on the [Elephants page of the CITES Website](#); and

- g) request the Secretariat to continue to engage with Burundi on the status of its ivory stockpile and, if invited, conduct a technical mission to verify the current status of the Burundi stockpile and to report to the Committee on its findings.

DRAFT AMENDMENTS TO RESOLUTION CONF. 10.10 (REV. COP19) ON  
*TRADE IN ELEPHANT SPECIMENS*

7. FURTHER URGES those Parties in whose jurisdiction there is an ivory carving industry, a legal domestic trade in ivory, an unregulated market for or illegal trade in ivory, or where ivory stockpiles exist, and Parties designated as ivory importing countries, to ensure that they have put in place comprehensive internal legislative, regulatory, enforcement and other measures to:

[...]

- e) maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and inform the Secretariat of the level of this stock each year before 28 February, *inter alia* to be made available to the programme Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses, indicating the number of pieces and their weight per type of ivory (raw or worked); for relevant pieces, and if marked, their markings in accordance with the provisions of this Resolution; the source of the ivory; and the reasons for any significant changes in the stockpile compared to the preceding year; and

- f) ensure that adequate funding, capacity building and training are available to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of properly; [text from Decision 19.156]

8. DIRECTS the Secretariat to annually publish updated summary data based on the inventories submitted by Parties disaggregated to regional but not country level, including the total ivory stockpiles by weight; [text from Decision 18.184 (Rev. CoP19)]



DRAFT DECISIONS ON  
*MANAGEMENT OF STOCKPILES*

***Directed to Parties***

**20.AA** Parties are encouraged to inform the Secretariat if they need training support in managing and securing their stockpiles of CITES-listed specimens.

***Directed to the Secretariat***

**20.BB** Subject to extrabudgetary resources and upon request, the Secretariat shall:

- a) provide training support to Parties for the secure management of stockpiles of CITES-listed specimens; and
- b) inform the Standing Committee of any lessons learned on stockpile management, as appropriate.