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



Seventy-seventh meeting of the Standing Committee Geneva (Switzerland), 6–10 November 2023

# Regulation of trade

# STOCKS AND STOCKPILES

- 1. This document has been prepared by the Secretariat in consultation with the Chair of the Standing Committee.
- 2. At its 19th meeting (CoP19; Panama City, 2022), the Conference of the Parties adopted a revision of its CoP17 Decision on *Stocks and stockpiles* as follows:

## Directed to the Standing Committee, with the assistance of the Secretariat

**17.170 (Rev. CoP19)** The Standing Committee shall, with the assistance of the Secretariat, review the existing provisions agreed by the Parties concerning controls on stocks of specimens of CITES-listed species. It shall consider their objectives and implementation, the resource implications for Parties and the Secretariat, and the work conducted during the previous intersessional periods, and shall report its conclusions and recommendations at the 20th meeting of the Conference of the Parties.

#### Previous intersessional work

3. To assist the Standing Committee in considering work conducted during previous intersessional periods, the Secretariat is providing a very short summary below. Based on document <u>CoP17 Doc. 47</u>, the Conference of the Parties adopted a Decision at its 17th meeting directing the Standing Committee, with the support of the Secretariat, to review existing provisions agreed by the Parties concerning controls on stocks of specimens of CITES-listed species and report its conclusions and recommendations to its 18th meeting. To implement this Decision, at its 69th meeting (Geneva, November 2017), the Standing Committee established an intersessional working group on stocks and stockpiles with the following terms of reference:

With the assistance of the Secretariat, the working group will pursue the following objectives:

- a) review the existing provisions agreed by the Parties concerning controls on stocks of specimens of CITES listed species provided in Annex 2 of document SC69 Doc. 43;
- b) identify CITES conservation and enforcement objectives in the management of both government and privately held stocks and stockpiles of specimens;
- c) suggest definitions of "stock" and "stockpile";
- d) consult with Parties affected by the measures in Annex 2 of document SC69 Doc. 43, through a Notification to them, to request information concerning the resources they use to implement these Resolutions and Decisions including any significant challenges they face in maintaining these stockpiles and using this information consider resource implications for Parties and the Secretariat;
- e) consult with Parties, INTERPOL, World Customs Organization, UN Office on Drugs and Crime, World Trade Organization, museums, appropriate representatives of private industry and any other technical

experts to identify best practices for robust stockpile management systems, identification of specimens (age and origin), inventory, corruption prevention, and disposal / destruction, with particular sensitivity to cost effectiveness required by developing countries;

- f) explore the legal implications of a Party selling confiscated specimens;
- g) consider different approaches to managing stockpiles of legally acquired specimens, and stockpiles of confiscated specimens, as well as the different treatment of stockpiles containing species listed in Appendices I, II and III; and
- h) on the basis of the discussions at the 69th meeting of the Standing Committee and the results of paragraphs a) to g) above, report conclusions and recommendations to the 70th meeting of the Standing Committee.
- 4. The intersessional working group, chaired by Israel, reported to the 70th meeting of the Standing Committee in document <u>SC70 Doc. 41</u> on the discussions and broad conclusions in relation to each aspect of the terms of reference. In its report, the working group noted that "Despite these broad conclusions, there is significant division within the working group, particularly regarding specifics of any recommendations based upon these conclusions. As a consequence, we request the Standing Committee to propose the following Decision to CoP18, requesting extension of the working group's mandate until CoP19".
- 5. Based on this request, the Standing Committed submitted a recommendation to the 18th meeting for the continuation of the work (see document <u>CoP18 Doc. 51</u>). At CoP18 (Geneva, 2019), the Conference of the Parties adopted a revised Decision 17.170 (Rev. CoP18) with wording similar to the one adopted by CoP17. To assist the Committee in its deliberations, the Secretariat prepared an overview of Resolutions and Decisions concerning stocks of specimens of CITES-listed species, contained in document <u>SC73 Doc. 21</u>. The Secretariat also summarized the previous discussions and suggested that the Standing Committee reestablish an intersessional working group to further the implementation of the Decision. Following this suggestion, at its 73rd meeting (online, May 2021), the Standing Committee re-established the intersessional working group with the following terms of reference:
  - a) review the existing provisions agreed by Parties concerning controls on stocks of specimens of CITESlisted species provided in paragraph 7 of document SC73 Doc. 21;
  - b) identify CITES conservation and enforcement objectives in the management of stocks and stockpiles of specimens;
  - c) suggest definitions of "stock" and "stockpile"; and
  - d) report to the Standing Committee at its 74th meeting.
- 6. The working group, chaired by Canada, reported on its discussions to the 74th meeting of the Standing Committee (SC74; Lyon, March 2022) in document <u>SC74 Doc. 60</u>. In its report, the working group presented its perspectives on existing challenges to implementation of CITES provisions on stocks and stockpiles; on the fundamental objectives of conservation and enforcement that should direct the management of stocks and stockpiles; and on the need for, and possible definition of, the terms "stock" and "stockpile".
- 7. In reviewing the existing provisions, the working group had identified the financial cost of maintaining the security and integrity of stockpiles as a major challenge, with existing provisions appearing to encourage retention and management of stocks and stockpiles rather than their destruction.
- 8. With respect to paragraph b) of the mandate, the working group highlighted that a fundamental objective of the provisions related to stocks and stockpiles was to ensure that existing stocks and stockpiles were secured and managed in such a way that specimens would not enter illegal trade. It was also noted that greater emphasis on the provision and use of guidance for the implementation of controls on stocks and stockpiles, the working group had not been able to reach any agreed conclusions.
- 9. Overall, the working group had not been able to fully complete the tasks directed to it in the terms of reference and recommended that the Standing Committee request the Secretariat to revise Decision 17.170 (Rev. CoP18) and propose its adoption at CoP19.

10. The Committee noted the report and agreed to seek the continuation of the mandate by the Conference of the Parties at its 19th meeting (see summary record <u>SC74 SR</u>). At CoP19, the Chair of the Standing Committee reported on the work undertaken by the Committee in document <u>CoP19 Doc. 9.1.1</u> and the Conference adopted the proposed revised Decision as set out above.

# Existing provisions agreed by the Parties concerning controls on stocks/stockpiles of specimens of CITES-listed species

11. To help the Standing Committee have an overview of current species-specific Resolutions and Decisions of the Conference of the Parties that include provisions related to stocks/stockpiles (in taxonomic order), the subparagraphs below summarize all such provisions. Where possible, reference is made to relevant documents that reports on the implementation of these provisions.

## a) <u>Tibetan antelope (Pantholops hodgsonii)</u>

In Resolution Conf. 11.8 (Rev. CoP17) on *Conservation of and control of trade in the Tibetan antelope*, the Conference of the Parties recommends that all Parties and non-Parties in whose territory stocks of Tibetan antelope parts and raw materials exist adopt a registration system and national measures to prevent such stocks from re-entering into trade.

Implementation: The Secretariat last reported on the national measures taken by Parties to prevent stocks of Tibetan antelope parts and raw materials from entering into trade in document <u>SC74 Doc. 76</u> on the implementation of Resolution Conf. 11.8 (Rev. CoP17), submitted to SC74. An updated report is provided to the present meeting in document SC77 Doc. 44.

## b) <u>Saiga antelope (Saiga spp.)</u>

In Decision 19.213, Saiga range States are encouraged to establish internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products, and registration of manufacturers and traders, and report such information to the Secretariat. Decision 19.214 directs the Secretariat to consult saiga range States and major trading and consumer States concerning their management of stockpiles of saiga specimens; review processes and practices; and provide assistance in ensuring effective stockpile management and monitoring, including the development of inventories and strengthening stockpile security; and report to the Animals Committee and Standing Committee on this matter, as appropriate.

Implementation: Implementation of this Decision is ongoing; see document SC77 Doc. 65.

# c) Vicuña (Vicugna vicugna)

Resolution Conf. 18.8 on *Conservation of vicuña* (Vicugna vicugna) *and trade in its fibre and products* urges all Parties trading in vicuña fibre to identify and record existing volumes of vicuña fibre in order to ensure appropriate traceability and control of the fibre and prevent illegal specimens to enter legal markets.

Implementation: At present, the Secretariat has no information regarding the implementation of this provision by Parties trading in vicuña fibre.

#### d) Asian big cats (Felidae spp.)

In Resolution Conf. 12.5 (Rev. CoP19) on *Conservation of and trade in tigers and other Appendix-I Asian big cat species*, Parties and non-Parties on whose territories stocks of parts and derivatives of tiger and other Asian big cat species (such as tiger bone stocks) exist, but not including pre-Convention specimens, are urged to consolidate and ensure adequate control of such stocks, and where possible destroy them, with the exception of those used for educational and scientific purposes.

Implementation: See documents SC77 Doc. 41.1 on the implementation of Resolution Conf. 12.5 (Rev. CoP19) and SC77 Doc. 41.2 on Asian big cats in captivity

## e) Rhinoceroses (Rhinocerotidae spp.)

In Resolution Conf. 9.14 (Rev. CoP19) on *Conservation of and trade in African and Asian rhinoceroses*, the Conference of the Parties urges all Parties that have stocks of rhinoceros horn to identify, mark, register and secure such stocks, and declare these to the Secretariat each year before 28 February, in a format to be defined by the Secretariat. The Secretariat has consequently developed a template for the submission of such information. The Resolution directs the Secretariat, prior to each meeting of the Conference of the Parties, and pending external funding, to commission the African and Asian Rhino Specialist Groups of the Species Survival Commission of the International Union for Conservation of Nature (IUCN/SSC) and TRAFFIC to prepare and submit a report to it including on stocks of specimens of rhinoceros horn stock declarations of Parties available to the IUCN/SSC African and Asian Rhino Specialist Groups and to TRAFFIC for its analysis and inclusion in its report. The Secretariat is then to make the report available at meetings of the Conference of the Parties and on the basis of it, formulate draft decisions for consideration by the Conference of the Parties, as appropriate.

Implementation: See document CoP19 Doc. 75 (Rev. 1).

f) Pangolins (Manis spp.)

Resolution 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins* encourages Parties on whose territories stocks of parts and derivatives of pangolins exist to take urgent steps to establish and apply, where not yet done, strict control measures to secure and monitor these stocks, and inform the Secretariat of the level of stocks each year, indicating the type and number of specimens, the species, the source of the specimens, management measures, and the reasons for any significant changes in the stockpile compared to the preceding year. Decision 19.202 encourages Parties in whose territories stocks of parts and derivatives of pangolins exist to take urgent steps to establish and apply, where not yet done, strict control measures to secure these stocks, as called for in paragraph 3 of Resolution Conf. 17.10 (Rev. CoP19) on *Conservation of and trade in pangolins* and report on the implementation of this Decision to the Secretariat. The Secretariat is directed to report on the implementation of Decision 19.202 to the Standing Committee, together with any recommendations it may have.

Implementation: The Secretariat notes that the provisions in Resolution 17.10 (Rev. CoP19) mentioned above are recent as they were only adopted when the Resolution was revised at CoP19. The Secretariat will report on the implementation to the 78th meeting of the Standing Committee in accordance with Decision 19.203, paragraph f).

#### g) Elephants (Elephantidae spp.)

- i) In Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens*, the Conference of the Parties urges Parties to introduce recording and inspection procedures to enable monitoring of the movement of ivory within the State, particularly by means of compulsory trade controls over raw ivory and comprehensive and demonstrably effective stock inventory, reporting, and enforcement systems for worked ivory.
- ii) Specifically, paragraph 7 e) of the Resolution urges Parties to maintain an inventory of governmentheld stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and to inform the Secretariat of the level of this stock 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 this Resolution; the source of the ivory; and the reasons for any significant changes in the stockpile compared to the preceding year. The Secretariat has developed a <u>template</u> for the submission of such information. Under Decision 18.184 (Rev. CoP19), the Secretariat is 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. The 2022 <u>summary data</u> as reported by 28 February 2023 is currently available on the CITES website.
- iii) Under Decision 19.157, the Secretariat is directed to compile feedback from Parties on 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 to submit to the Standing Committee recommendations relating to the incorporation of new information in the guidance documents or any of the documents referred to in the guidance documents.

iii) Decisions 18.184 (Rev. CoP19) and 18.185 (Rev. CoP19) direct the Standing Committee to consider reports and recommendations from the Secretariat on 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 determine whether any further actions are necessary.

Implementation: See document SC77 Doc. 63.1 on *Implementation of Resolution Conf. 10.10* (*Rev. CoP19*) and related Decisions and document SC77 Doc. 51 on *Stocks and stockpiles (elephant ivory)*.

## h) <u>Pythons (Boidae spp.)</u>

Resolution Conf. 17.12 on *Conservation, sustainable use of and trade in snakes* encourages range and consumer State Parties to test and consider the introduction of innovative traceability methods for snake skins. It recommends that, prior to the implementation of a traceability system for python skins, Parties inventory and tag those skins and provide this information to the Secretariat as a baseline. Inventories of the initial stockpiles should contain information on the species concerned, the stage of processing of the skins (crust, dried, etc.) and the corresponding quantities and tag numbers, and also the year of harvest for skins newly entering the stockpiles. The tagging method used should distinguish between skins of the initial stockpiles and skins harvested at later points in time.

Implementation: At this point in time, the Secretariat has no information as to whether Parties have implemented tagging methods that distinguishes between skins of the initial stockpiles and skins harvested at later points in time.

## i) Sharks and rays (Elasmobranchii spp.)

i) In accordance with their national legislation, Parties are encouraged in Decision 19.222 to provide a brief report to the Secretariat about the assessment of stockpiles of shark parts and derivatives for CITES-listed species stored and obtained before the entry into force of their inclusion in CITES in order to control and monitor their trade, if applicable. The Secretariat was also instructed to issue a Notification to the Parties inviting them to provide a summary of activities concerning the recording of stockpiles of commercial and/or pre-Convention shark parts and derivatives for CITES Appendix-II elasmobranch species and controlling the entry of these stocks into trade.

Implementation: The Secretariat issued Notification to the Parties N° 2023/027 on 16 March 2023 requesting such information. Responses received from Bangladesh, Brazil, Colombia, Costa Rica, Croatia, El Salvador, European Union, Guatemala, Honduras, Indonesia, Italy, Japan, Maldives, Mexico, Mozambique, Nicaragua, Panama, Peru, Republic of Korea, Slovakia, Spain, Sweden, United Kingdom of Great Britain and Northern Ireland and United States of America can be found in <u>Annex 2</u> to document AC32 Doc. 37.

ii) In Decision 19.226, the Standing Committee is directed to develop new guidance or identify existing guidance on the control and monitoring of stockpiles of shark parts and derivatives, in particular for specimens caught prior to the inclusion of the species in Appendix II, and the Secretariat is instructed to disseminate this guidance to Parties in Decision 19.224, paragraph d).

Implementation: At its 75th meeting, the Standing Committee established an intersessional working group on sharks and rays. The mandate of the working group includes consideration of this Decision.

# j) <u>Marine turtles</u>

Resolution Conf. 19.5 on *Conservation of and trade in marine turtles* contain guidelines for evaluating marine turtle ranching proposals submitted pursuant to Resolution Conf. 11.16 (Rev. CoP15) on *Ranching and trade in ranched specimens of species transferred from Appendix I to Appendix II* set out in the Annex to the Resolution and measures to be taken with regard to trade controls. Proposing Parties must *inter alia* undertake registration of any existing stockpiles of marine turtle parts and derivatives held within its territorial jurisdiction and instigate marking and control systems to ensure that such items are readily distinguishable from similar items deriving from approved ranches. In addition, importing States shall undertake to provide documentation of the measures taken to control existing stockpiles of such specimens.

Implementation: This Resolution was adopted recently and no information is available yet on the implementation of this provision.

k) Malagasy ebonies (Diospyros spp.) and Malagasy palisanders and rosewoods (Dalbergia spp.)

In Decision 19.71, Madagascar is directed to strengthen the management of all *Dalbergia* spp. and *Diospyros* spp. timber stockpiles in Madagascar (including through traceability and control systems); request financial and technical assistance therefor; and submit regular updates on audited inventories and independent oversight mechanisms, for consideration and further guidance from the Standing Committee.

Implementation: See document SC77 Doc. 33.12.

I) Brazil wood (Paubrasilia echinata)

In Decision 19.251, Parties, and in particular source, transit and destination Parties for *Paubrasilia echinata*, are invited to consider the registration of stockpiles of *Paubrasilia echinata* as appropriate; and the Secretariat is directed to prepare a report on the implementation of Decision 19.251 and submit any resulting recommendations to the Standing Committee.

Implementation: See document SC77 Doc. 6.

## **Discussion**

- 12. Based on this review and on work conducted during the previous intersessional periods, it would appear that there is a common understanding that the fundamental objective of provisions related to stocks is to ensure that existing stocks and stockpiles are secured and managed in such a way that specimens would not enter illegal trade. This seems to be irrespective of the origin of the specimens and of the purpose of the stockpiling, or the ultimate destination or destruction of the specimens. With regard to the implementation and the resource implications of the provisions related to stocks and stockpiles, there also seems to be agreement that one of the major challenges identified is the financial cost of maintaining the security and integrity of stockpiles. On this last aspect, with respect to illegally traded and confiscated specimens, Parties are encouraged to implement paragraph 5 a) of Resolution Conf. 17.8 (Rev. CoP19) on *Disposal of illegally traded and confiscated specimens of CITES-listed species* to make legislative provisions to require the importer or the carrier who violated the Convention, or both, to meet the costs of confiscation, custody, storage, destruction or other disposal.
- 13. The Standing Committee is invited to consider this brief summary of work conducted during previous sessions and to focus its attention on those aspects that have not been fully covered yet. This includes the issue of proposing a definition of "stocks and stockpiles" as well as the development of additional guidance related to the management and control of stocks and stockpiles.

#### Definition of stocks/stockpiles

14. With respect to a possible CITES definition of stocks/stockpiles, it is noted that a common understanding of the terms would be useful for Parties to know whether they are expected to implement the above-mentioned provisions with respect to stocks and stockpiles of certain species. In reviewing the provisions in paragraph 11 above, it can be observed that Parties seem to have used the two words *stocks* and *stockpiles* interchangeably in Resolutions and Decisions – and sometimes even in relation to the same species (elephant):

"Stocks" used in the context of the following	"Stockpiles" used in the context of the following
species	species
Tibetan antelope [subparagraph a)]	Saiga antelope [subparagraph b)]
Elephant [subparagraph g)]	Elephant [subparagraph g)]
Rhinoceroses [subparagraph e)]	Pythons [subparagraph h)]
Pangolins [subparagraph f)]	Sharks and rays [subparagraph i)]
Tigers and other Asian big cats [subparagraph d)]	Marine turtles [subparagraph j)]
	Malagasy ebonies, palisanders and rosewood
	[subparagraph k)]
	Brazil wood [subparagraph l)]

- 15. With respect to vicuña fibres, the word "volumes" has been used [subparagraph c)] rather than stocks or stockpiles and in the context of tree species, only "stockpiles" is used. Building on the previous discussions in the Standing Committee and its working groups and in trying to ensure that all Parties have the same understanding of the terms, the Secretariat would like to offer the following considerations:
  - a) a single definition for both terms seems desirable;
  - b) the definition should be simple and broad enough to cover all existing provisions;
  - c) it should contain no detailed criteria;
  - d) all sizes of stocks/stockpiles should be covered; and
  - e) it should not refer to the purpose or origin of the stock/stockpile.
- 16. Based on these considerations, the Standing Committee may wish to consider the following definition of stocks/stockpiles:

Stocks, stockpiles: In the context of CITES, the words stocks and stockpiles are used interchangeably to refer to any volume or number of accumulated dead specimens of CITES-listed species held temporarily by public or private entities.

17. This suggested definition would not apply to stocks in the wild, such as fish stocks or standing stocks of trees as such stocks are not considered to be "held". The word "temporarily" is used to exclude permanent collections held by museums, scientific institutions or individuals. "Accumulated dead specimens" is the term used in paragraph 2 a) of Resolution Conf. 17.8 (Rev. CoP19) and is used here to indicate that only when there has been some effort or activity to bring specimens together in one or more locations will it constitute a stock/stockpile, irrespective of the size or the origin of that stock/stockpile. Furthermore, there seems to be a common understanding that stock/stockpiles are only used in the context of dead specimens as the terms have not been used with regard to live specimens in the past. However, stocks/stockpiles may be of a perishable nature. The proposed definition also includes stocks/stockpiles held by private entities to be as broad as possible; it is noted that many of the existing provisions refer to stocks/stockpiles or volumes that exist within the jurisdiction of a Party without making any distinction as to the entity holding or owning the specimens.

#### Guidance material related to the management and control of stocks/stockpiles

- 18. From a practical perspective to help Parties manage and control stocks of specimens of CITES-listed species, there might be some merit in providing guidance on management and control of stocks and stockpiles and on the methods for preventing specimens from entering into illegal trade. Practical guidance on the forensic use, inventorying and maintenance, monitoring and marking, security, and elimination or destruction of stocks and stockpiles developed by experts among Parties and observers would assist stock/stockpile management.
- 19. Guidance related to non-perishable goods, including elephant ivory, pangolin scales and rhino horn, is available in the <u>Practical Guidance</u> agreed at SC74 (see information <u>document CoP18 Inf. 72</u> *Ensuring Effective Stockpile Management: A Guidance Document*). The document provides hands-on guidance on the prerequisites for effective stockpile management, including a simple checklist to assess the status of stockpile management at the national level; as well as guidance on how to conduct a stockpile inventory or an audit of such an inventory. Finally, it also contains basic guidance on security and storage. As mentioned above, Parties are encouraged to use this guidance and provide feedback to the Secretariat on any experiences and new techniques and methodologies. The guidance document exists in English and <u>French</u> and several non-CITES languages as well. This guidance can be readily applied to stockpiles of saiga horn and will be the basis for the support of the Secretariat to Parties under Decision 19.214. The Secretariat welcomes any feedback on the use of the guidance with respect to stocks/stockpiles of other species.
- 20. The guidance has not been designed for the effective and secure management of stockpiles of timber tree species or other plant species and no other such guidance has been developed in the context of CITES. However, there seem to be a need for this, both with regard to confiscated specimens and with regard to pre-Convention specimens, in particular after the inclusion of some 500 tree species in Appendix II at CoP19, some of which with a delayed implementation date. The Standing Committee may wish to consider whether

the guidance mentioned above can be adapted to cover stockpiles of timber or whether new guidance on such stockpiles should be developed.

- 21. It is also recalled that CoP19 directed the Standing Committee to develop new guidance or identify existing guidance on the control and monitoring of stockpiles of shark parts and derivatives, in particular for specimens caught prior to the inclusion of the species in Appendix II and instructed the Secretariat to disseminate this guidance to Parties.
- 22. Finally, in this context, it should be noted that, in reviewing Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*, the Standing Committee has a mandate in Decision 19.66, paragraph c), to consider adding guidance in the Resolution relating to stockpile management. The intersessional working group on *Review of Resolution Conf. 11.3 (Rev. CoP19)* established by the Standing Committee at its 76th meeting is still considering this as noted in the report of the working group to the present meeting (see document SC77 Doc. 38).

#### Conclusions and recommendations

- 23. The Standing Committee is invited to
  - a) consider the work conducted in past intersessional periods as summarized in paragraph 3 to 10 above;
  - b) take note of the review of existing provisions on stocks/stockpiles in Resolutions and Decisions and the information on their implementation contained in paragraph 11 above;
  - c) consider the suggested definition of stocks/stockpiles contained in paragraph 16 of the present document and agree on a definition to assist Parties with implementation;
  - d) encourage Parties to use the <u>Practical Guidance</u> and <u>Ensuring Effective Stockpile Management: A</u> <u>Guidance Document</u> as needed for the management of stockpiles of rhino horn, elephant ivory, pangolin scales and saiga horn as well as stocks/stockpiles of other species where the guidance can be applied and provide feedback to the Secretariat on the use of the guidance; and
  - e) consider whether additional guidance on management and controls of stockpiles of timber tree species is needed and, if appropriate, develop such guidance with the assistance of the CITES Secretariat.