

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 (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 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 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) and previously adopted at CoP18 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.*

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 2022, which were submitted by 28 February 2023.
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, 46 (25%) Parties have declared their ivory stockpiles for one year or another, but only two Parties have declared their stockpiles every year. One non-Party has also declared its stockpiles of ivory for several years. Of those 47 countries, 24 are from the African region, 12 from Asia, 8 from Europe, 2 from Oceania, 1 from North America and none from Central and South America and the Caribbean. Eight of these 47 Parties have submitted information about significant privately held stockpiles of ivory since 2014. The number of Parties making ivory stockpile submissions has remained relatively stable as shown in Table 1 below. However, five Parties have reported for the first time in 2022 or 2023.

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
4	24	15	16	23	17	16	22	24	22

* China and the Hong Kong Special Administrative Region 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'.
8. The Secretariat does not have 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 two Parties have reported on privately held stockpiles in the reports submitted by February 2023.
9. In relation to government-held ivory stockpiles, inferences about the presence of stockpiles can be drawn from three sources. Firstly, aggregated data from 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 Benin, Burkina Faso, the Central African Republic, the Democratic Republic of the Congo, Ghana, Liberia and Mali. In some of these cases, the number of tusks involved was very small. The Secretariat, through the 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. Secondly, several Parties which have never declared ivory stockpiles, have nevertheless developed National Ivory Action Plans (NIAPs) which contain measures concerning stockpiles. This applies to Cameroon, the Democratic Republic of the Congo and Togo. Thirdly, [data from 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 2020. 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 Austria, Belgium, Burkina Faso, Burundi, Cameroon, Canada, the Central African Republic, Congo, Croatia, Czech Republic, the Democratic Republic of the Congo, Denmark, Djibouti, Egypt, Estonia, France, Guinea, Hungary, India, Israel, Jordan, Latvia, Morocco, Myanmar, Nepal, the Netherlands, Pakistan, Portugal, Qatar, Republic of Korea, Romania, Rwanda, Saudi Arabia, Senegal, Slovenia, Spain, Sri Lanka, Sudan, Sweden, Thailand, Togo, Tunisia, Türkiye and the United Kingdom of Great Britain and Northern Ireland.
10. The Secretariat does not have the capacity to systematically follow up on all the cases referred to in paragraph 9. However, with regard to Parties which have reported seizures to ETIS but no information on stockpiles, reference is made to paragraphs 16-17 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 sent another letter to Burundi requesting an invitation to undertake the technical mission regarding the elephant ivory stockpile. At the time of writing, no response has been received. The Secretariat will continue to try to engage with Burundi on this matter and will inform the Standing Committee of any progress at its 78th meeting.
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 of any other particular Party to the Standing Committee under Decision 18.185 (Rev. CoP19) because their stockpile is not well secured.

Other related issues

15. The Secretariat is pleased to inform the Committee that it has recently initiated a project to better systematize and secure the data on ivory stockpiles reported by Parties with the generous support of Switzerland. Under the project, the Secretariat will explore how reporting of the data by Parties can be further facilitated to ensure that more Parties report more comprehensive data.
16. The Secretariat would like to note 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.
17. In this context, the Secretariat would like to draw the Committee's attention to document SC77 Doc. 50 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.

Conclusions and recommendations

18. 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.
19. In light of the information provided in the present document, the Standing Committee is invited to:
 - a) encourage Parties to step up their efforts to comply with the provisions of 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 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) recommend that Parties submit information on destroyed stockpiles to the extent possible; and
- d) request the Secretariat to continue to engage with Burundi 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 on *CITES compliance procedures*, to verify the current status of the Burundi stockpile, and to report to the Committee on its findings.