

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



Seventy-fourth meeting of the Standing Committee
Lyon (France), 7 - 11 March 2022

Interpretation and implementation matters

Exemptions and special trade provisions

Stocks and stockpiles (elephant ivory)

ANNUAL INVENTORIES OF STOCKPILES:
REPORT OF THE SECRETARIAT

1. This document has been prepared by the Secretariat.

Introduction

2. Paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens* urges 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 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.”
4. At the 18th meeting of the Conference of the Parties (Geneva, 2019), the Parties adopted two Decisions related to this provision of Resolution Conf. 10.10 (Rev. CoP18) as follows:

18.184 Directed to the Secretariat

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 72nd and 73rd meetings¹ 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.*

¹ The Secretariat believes that the intention was to refer to the 73rd and 74th meetings of the Standing Committee.

18.185 Directed to the Standing Committee

At its 72nd and 73rd meetings², the Standing Committee shall consider the report and recommendations of the Secretariat in Decision 18.184 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 of the obligation to submit information on the level of their stocks 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 2020, which were to be submitted before 28 February 2021. As late submissions are not uncommon, the Secretariat will provide an oral update on submissions made by 28 February 2022 at the present meeting.
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, 39 (21%) Parties have declared their ivory stocks for one year or another, but only two Parties have declared their stockpiles every year. Of those 39 Parties, 20 are from the African region, 11 from Asia, 5 from Europe, 2 from Oceania, 1 from North America and none from Central and South America and the Caribbean. Eight of these 39 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. Discrepancies between these figures and those to be found in document CoP17 Doc. 57.6 (Rev. 1) appear to have arisen because submissions are sometimes allocated to the reporting year involved and sometimes to the actual year in which the submission was made.

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

2014	2015	2016	2017	2018	2019	2020	2021
4	24	15	16	23	17	16	22

* China and the Hong Kong Special Administrative Region have been treated separately as they 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. CoP18). Firstly, the Secretariat does not possess a formal list of those Parties where an ivory carving industry exists, where there is a legal domestic trade in ivory, where there is an unregulated market for or illegal trade in ivory, or where ivory stockpiles actually exist. Secondly, there is also no adopted definition of what constitutes 'a stockpile'. It should be noted that the Committee's intersessional working group on stocks and stockpiles has been mandated to provide suggest definitions of the terms "stock" and "stockpile".
8. The Secretariat does not have complete information on which Parties appear to have stockpiles (discrete assemblages) of government-held ivory but have never reported such stockpiles. Less information still is available 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.
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. It may be supposed that some or all of this recovered ivory was 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

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on stockpile management to remind the elephant range States about reporting their stockpiles to the Secretariat and to offer 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](#) indicate that a number of Parties which have not submitted ivory stockpiles declarations have reported making seizures of ivory during the period 2014 to 2019. 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, Benin, Burkina Faso, Burundi, Cameroon, Canada, the Central African Republic, Croatia, the Democratic Republic of the Congo, Denmark, Egypt, Estonia, France, Guinea, Hungary, India, Israel, Italy, Jordan, Latvia, Myanmar, Nepal, the Netherlands, Pakistan, Portugal, Qatar, Romania, Rwanda, Saudi Arabia, Senegal, Slovenia, Spain, Sri Lanka, Sudan, Sweden, Thailand, Togo, Tunisia, Turkey and the United Kingdom of Great Britain and Northern Ireland.

10. The Secretariat has not systematically followed up all the cases referred to in paragraph 9. Further, there may be other Parties which have made one or more declarations of ivory stocks during the period 2014-2021, but whose submissions do not cover all the ivory which may have derived from recoveries from MIKE sites, NIAP obligations or seizures.

Identification of Parties where stockpiles are not well secured

11. In document [SC50 Doc. 21.4](#) submitted to the 50th meeting of the Standing Committee (Geneva, March 2004), Burundi sought permission to sell certain stocks of ivory found in its territory amounting to over 87 tonnes. The Committee agreed that the Secretariat should prepare a discussion paper on this subject for consideration at the 13th meeting Conference of the Parties (Bangkok, 2004). This paper was submitted as document [CoP13 Doc. 29.6](#) and was noted by the CoP. Since 2014 when this provision was first agreed in Resolution Conf. 10.10 (Rev. CoP18), Burundi has not informed the Secretariat of any stockpiles it may hold.
12. A seizure made in Uganda in March 2015 contained ivory, which the Secretariat had reason to believe came from the stockpile which had been held in Burundi. The Secretariat wrote to Burundi in May 2015 to request information on the status of its ivory stockpile and an enquiry into how specimens from it could have been found in illegal trade.
13. Receiving no reply from Burundi, at the 71st meeting of the Standing Committee (SC71, Geneva, August 2018), under paragraph 10 a) of Resolution Conf. 10.10 (Rev. CoP18), the Secretariat identified the country as a Party where ivory stockpiles are not well secured.
14. At SC71, under paragraph 10 c) of Resolution Conf. 10.10 (Rev. CoP18), the Standing Committee, *inter alia*, agreed the following recommendations:
 - *requested Burundi to report on the status of its ivory stockpiles, including information on any activities conducted and findings made following the May 2015 letter of the Secretariat concerning ivory from the Burundi stockpile that allegedly made its way into illegal trade; and*
 - *requested the Secretariat to make the report from Burundi available to the Committee at its 73rd meeting, together with any recommendations the Secretariat may have.*
15. The Secretariat wrote to Burundi on 13 November 2019 recalling its letter of May 2015 and requesting the Party to provide the Secretariat with a comprehensive report on the status of its ivory stockpiles, but no reply was received. In November 2021, the Secretariat sought the assistance of the United Nations Resident Coordinator in Burundi to obtain a response. The Secretariat will report orally at the present meeting on any information received from Burundi and, in the absence of any report from Burundi, present any consequent recommendations that it has for the Standing Committee.
16. The Secretariat has not received any recent information regarding ivory thefts from stockpiles at a significant level or any other which would warrant the referral of any particular Party to the Standing Committee under Decision 18.185 because their stockpile is not well secured.

Conclusions and recommendations

17. Notwithstanding the efforts of a number of Parties, a large number of 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. CoP18). Very few Parties have declared significant privately held stockpiles of ivory to the Secretariat, although there is anecdotal evidence that such stockpiles exist.
18. The Secretariat recommends that:
 - a) the Standing Committee appeal to Parties to step up their efforts to comply with the provisions of paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens* concerning stockpiles, with a view of submitting the required information to the Secretariat every year;
 - b) regional Members and Alternate regional Members, as part of their regular contact with Parties in their region, remind Parties of the obligations of paragraph 7 e) of Resolution Conf. 10.10 (Rev. CoP18); and
 - c) in the absence of any report from Burundi by the time of the present meeting, the Standing Committee request the Secretariat 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.
19. The Standing Committee is further invited to determine whether any actions are necessary in the case of Parties that have failed 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.
20. Finally, the Secretariat requests the Standing Committee to take note of its intention to recommend the deletion of Decisions 18.184 and 18.185 at the 19th meeting of the Conference of the Parties.