



# Practical guidance for the management of ivory stockpiles, including their disposal

## INTRODUCTION

Accumulations of elephant ivory will occur in many Parties due to confiscation of illegally possessed or traded (both internationally and nationally) ivory. In range States, accumulations will also occur due to found ivory resulting from natural mortality and from illegally killed elephants where the tusks have not been removed by the perpetrators.

In relation to confiscated and accumulated dead specimens of Appendix-I species such as elephants, Resolution Conf. 17.8 on *Disposal of illegally traded and confiscated specimens of CITES-listed species* recommends that they be disposed of “only for *bona fide* scientific, educational, enforcement or identification purposes, and save in storage or destroy specimens whose disposal for these purposes is not practicable”.

The demand for ivory for scientific, educational, enforcement or identification purposes being limited, storage or destruction are often the options chosen by Parties.

In relation to ivory that is stored, Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens, paragraph 7 e* urges Parties to maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory.

In paragraph 2 of the Resolution, the Conference of the Parties recommends that whole tusks of any size, and cut pieces of ivory that are both 20 cm or more in length and one kilogram or more in weight, be marked by means of punch-dies, indelible ink, or other form of permanent marking, using the following formula: country-of-origin two-letter ISO code, the last two digits of the year / the serial number for the year / and the weight in kilograms (e.g. KE 00/127/14). It is recognized that different Parties have different systems for marking and may apply different practices for specifying the serial number and the year (which may be the year of registration or recovery, for example), but that all systems must result in a unique number for each piece of marked ivory. This number should be placed at the ‘lip mark’, in the case of whole tusks, and highlighted with a flash of color.

In Resolution Conf. 10.10 (Rev. CoP18), paragraph 7 e), Parties are further 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 this Resolution; the source of the ivory; and the reasons for any significant changes in the stockpile compared to the preceding year”. This information is made available to the Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses.

To facilitate the submission of this information, the Secretariat has prepared a [model inventory for the declaration of an ivory stock](#).

In order to implement the above-mentioned provisions of Resolution Conf. 10.10 (Rev. CoP18) and to ensure that stored ivory does not find its way into illegal international trade and that samples are available for forensic research and in support of investigations and prosecutions, effective ivory stockpiles management systems are required. Should Parties decide to destroy their ivory stockpiles, or part of them, consideration needs to be given to the best means of achieving this cheaply, efficiently and limiting negative environmental side-effects.

It should be noted that Resolution Conf. 10.10 (Rev. CoP18) directs the Secretariat to identify those Parties where ivory stockpiles are not well secured and report its findings and recommendations to the Standing Committee, which may recommend remedial measures to support the implementation of the Resolution, including requesting identified Parties to develop and implement a National Ivory Action Plan, if deemed necessary by the Standing Committee.

## KEY ATTRIBUTES FOR EFFECTIVE IVORY STOCKPILES MANAGEMENT SYSTEMS

Many Parties already have national ivory stockpile management systems in place, and these may be satisfactory for responding to the provisions set out in Resolution Conf. 10.10 (Rev. CoP18). However, for those Parties establishing ivory stockpile management systems or reviewing existing systems, the following table of key attributes and links to more detailed guidance may be of assistance. Within the stockpile management, it is crucial to have Standard Operating Procedures (SOPs) in place for the handling and tracking of ivory through the entire chain of custody, including the identification of staff responsible for security and accountability of the ivory stocks.

More detailed discussion on the background to stockpile management generally and ivory stockpiles in particular can be found in a [report by TRAFFIC](#) which is posted on the CITES website.

Attribute	Sources of more detailed explanations and examples
1. Legal mandate for stockpile management	<p>The consolidation, maintenance, management and the disposal or destruction of Government-controlled stockpiles need to be undertaken by an authority with a clear legal mandate under national law to undertake the activity in question.</p> <p>The authority concerned may vary from Party to Party and the responsibility may be split between different authorities responsible for the various actions listed above.</p> <p>An absence of legal authority for these actions may result in an incoherent policy which could jeopardize the security of the stockpile maintenance and compromise law enforcement or judicial activities.</p> <p>Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a></p>
2. Attribution of roles and responsibilities	<p>Authorities with a legal mandate for either the consolidation, maintenance, management, disposal or destruction of Government-controlled stockpiles need to ensure that they have an operational protocol for discharging their responsibilities (see Standard Operating Procedures below). This needs to attribute roles and responsibilities for individual actions and staff accountability for ensuring that these are adhered to during every step in the chain of custody.</p> <p>Without proper attribution of roles and responsibilities, the security of the stockpile could be at risk.</p> <p>Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a></p>
3. Standard Operating Procedures (SOPs) for stockpile Management, which should include e.g.	Quality management principles, e.g. ISO 9001 I
a. Ivory stock inventory	All ivory stockpiles should be fully inventoried to enable an accurate and real-time record of stocks held to be available at all times. If stock is held at more than one physical site, records need to be maintained of all transfers between sites.
	<p>An accurate contemporary inventory is an essential prerequisite for stockpile management. An audit process should be set-up to ensure accuracy of the stockpile data.</p> <p>Further guidance: <a href="#">Elephant Protection Initiative. Protocol for Planning and Conducting Ivory Inventories</a>  <a href="#">Elephant Protection Initiative. Stockpile Management System (SMS)</a>  <a href="#">Elephant Protection Initiative. The Best Practices and Gold Standards for the Management of Ivory (and other wildlife products)</a></p>
b. Inter-agency collaboration	<p>If more than one authority is involved in the consolidation, maintenance, management and the disposal or destruction of Government-controlled stockpiles, then regular coordination is needed between them, preferably using a shared SOP.</p> <p>This applies to all relevant authorities where the administrative organization of the Party requires involvement at different levels of government.</p> <p>Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a></p>
c. Data management and reporting	Ideally, ivory inventories should be digitized using secure software and managed by qualified staff. This reduces the scope for security breaches and improves the accuracy and timeliness of statistics. Annual transmission of the level of a stock is to be made available before 28 February, including the minimal information as indicated in Resolution Conf. 10.10 (Rev. CoP18) (Trade in elephant specimens)

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	Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a>
d. Security during transport and at storage facilities	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 locality to another. Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a> <a href="#">Elephant Protection Initiative. The Best Practices and Gold Standards for the Management of Ivory (and other wildlife products)</a>
e. Storage staff capacity-building	Staff involved in security, management, handling and record-keeping related to ivory stockpiles need to be adequately trained to undertake their duties competently and cleared of any conflict of interest. Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a>
f. Marking system	Ivory in stockpiles needs to be marked in accordance with national law and international standards as adopted by the Conference of the Parties to CITES. Details of the marking need to be integrated into the inventory. Further guidance: <a href="#">Paragraph 2 of Resolution Conf. 10.10 (Rev. CoP18)</a>
g. Sampling	Stockpiles containing confiscated ivory should be accessible for scientific and/or forensic sampling and testing of such ivory, in line with Resolution Conf. 10.10 (Rev. CoP18) (Trade in elephant specimens). Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a> <a href="#">Elephant Protection Initiative. Protocol for Planning and Conducting Ivory Inventories</a> UNODC's <a href="#">Guidelines on Methods and Procedures for Ivory Sampling and Laboratory Analysis</a>
h. (if opted for) destruction procedure	If destruction of ivory stockpiles is envisaged, appropriate techniques should be used to ensure that ivory does not enter or re-enter illegal trade. The national inventory should be used to carefully record which ivory should be and has been destroyed. Further guidance: <a href="#">Secretariat Review of Elephant Ivory Destruction Methods</a>
4. Financing the stockpile management system	The cost of storage infrastructure, staffing and routine running costs, data management, marking and possible destruction may be significant. Options chosen for these should be commensurate with funds available, particularly recurring costs, as a breakdown in procedures could allow ivory to enter or re-enter illegal trade. Further guidance: <a href="#">Milliken T. and Compton J., Ensuring Effective Stockpile Management: A Guidance Document</a>