Management of Wildlife Stockpiles

Photo taken from Shutterstock by Iacomino FRiIMAGES

TRAFFIC
the wildlife trade monitoring network

ACKNOWLEDGEMENTS

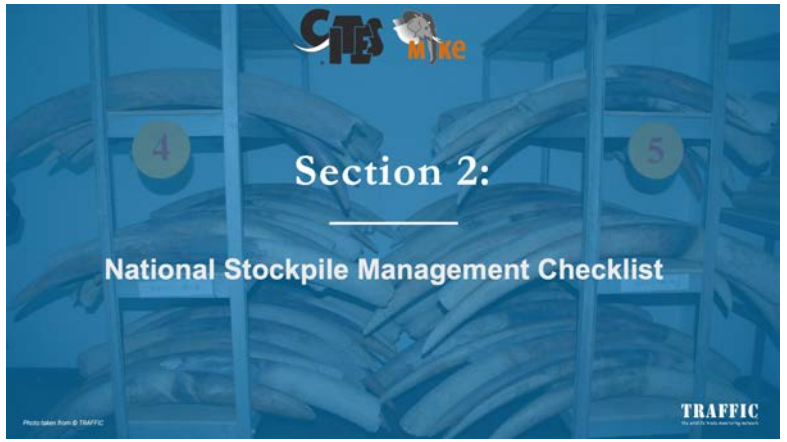
The stockpile management training material was produced with financial support from the European Union in the context of the UNODC-CITES Asia Wildlife Law Enforcement and Demand Management Project. The European Union MIKES+ project supports the training sessions presented to range States in Africa


Management of
Wildlife Stockpiles
TRAFFIC

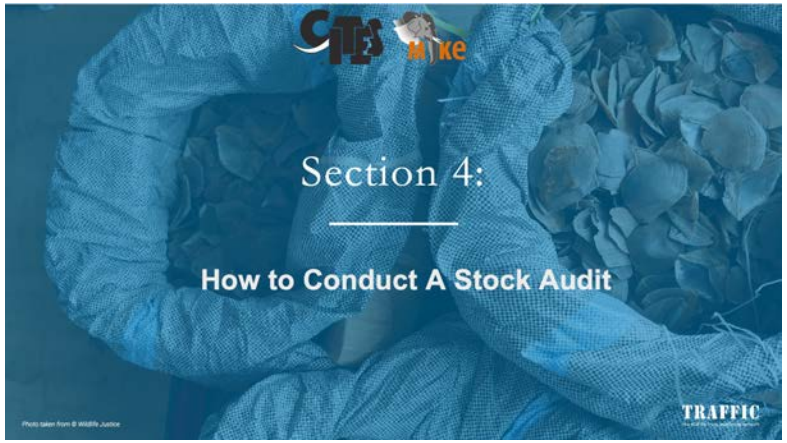

Introduction
Why stockpile management?
TRAFFIC

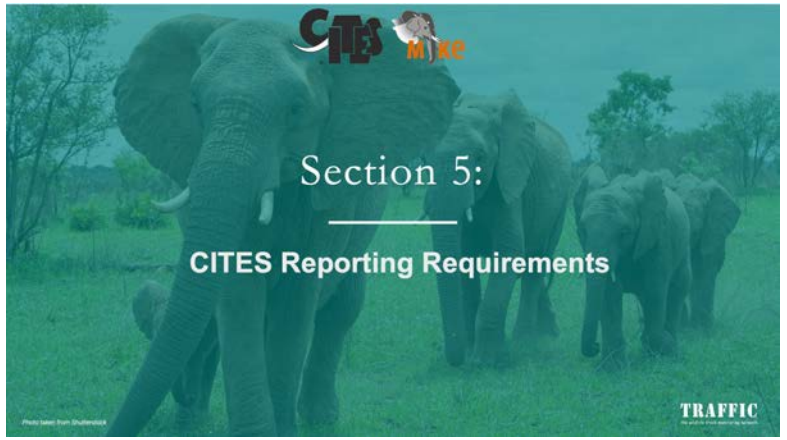

Getting started
Documents relating to Stockpile Management
TRAFFIC


Section 1:
Effective Stockpile Management
TRAFFIC


Section 2:
National Stockpile Management Checklist
TRAFFIC


Section 3:
How to Conduct A Stock Inventory
TRAFFIC


Section 4:
How to Conduct A Stock Audit
TRAFFIC


Section 5:
CITES Reporting Requirements
TRAFFIC


Section 6:
Stockpile Security and Storage
TRAFFIC

Introduction

Why stockpile management?

Photo taken from Unsplash.com by Fabrizio Frigeni

TRAFFIC
the wildlife trade monitoring network

What are stockpiles?

Thailand ivory crush.

Photo taken from © TRAFFIC

How do stockpiles accumulate?

- Wildlife products come into government custody from two main sources:

1. *in situ* wildlife management activities and interventions
2. law enforcement actions

- Private sector traders can also acquire stockpiles through trade, captive breeding operations, or ownership of products that pre-date legal controls.
- Stockpiles can derive from legal or illegal sources.


Seized rhino horn


Seized pangolin scales

Photo taken from © TRAFFIC

Photo taken from © TRAFFIC

Who is involved in stockpile management?

Key stakeholders include:

- government authorities undertaking wildlife management activities;
- law enforcement agencies (customs, police, prosecutors, etc.) with powers to seize wildlife and/or prosecute wildlife crime;
- the CITES Management Authority of each country;
- government authorities who supervise state assets; and
- private sector owners with stockpiles of targeted species.

TRAFFIC
the wildlife trade monitoring network

Why is stockpile management necessary?

Stockpile management is vitally important for:

- Reducing the risk of corruption and theft;
- Safeguarding wildlife trade crime evidence;
- Maintaining the long-term identity of individual specimens over time;
- Fostering administrative accountability, transparency and “best practices”;
- Meeting annual international and national reporting requirements; and
- Tracking morphological data to monitor the status of native wildlife.

Are there special needs to consider?

Special needs include understanding that:

- Recurrent budgetary needs require annual review and planning;
- Illegal wildlife trade may require transit or end-use countries to develop long-term stockpile management systems for non-indigenous species;
- Large-scale seizure events create unique management and security challenges; and
- Secure storage until judicious disposal or destruction entails capital investment and inter-agency collaboration.

What will you learn about stockpile management?

- This course will cover the following:

1. Designing holistic, effective systems and tools
2. Marking of specimens
3. Recording inventories
4. Undertaking audits
5. Meeting annual stockpile reporting requirements under CITES
6. Securing long-term storage

- Particular attention will be placed on implementation of CITES Resolutions and decisions on stockpile management.

What will you learn about stockpile management?

Six aspects will be covered:

- 1: Effective Stockpile Management
- 2: National Stockpile Management Checklist
- 3: How to Conduct a Stock Inventory
- 4: How to Conduct a Stock Audit
- 5: CITES Reporting Requirements
- 6: Stockpile Security and Storage

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

COURSE INTRODUCTION COMPLETE!

Take the quiz to test your knowledge...

Getting started

Documents relating to Stockpile Management

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

1 Resource Materials

CITES Resolutions

CITES Resolutions **remain in effect until** amended or repealed and provide long-standing guidance relating to implementation.

There are at least **eight** valid CITES Resolutions that includes aspects of stockpile management:

- Resolution Conf. 18.8 - Conservation of vicuña (Vicugna vicugna) and trade in its fibre and products [paragraph 1 f)]
- Resolution Conf. 17.12 - Conservation, sustainable use of and trade in snakes (paragraph 19 for trade in and stocks of python skins);
- Resolution Conf. 17.10 - Conservation of and trade in pangolins (paragraph 3 for maintaining secure stocks);
- Resolution Conf. 17.8 - Disposal of illegally traded and confiscated specimens of CITES-listed species
- Resolution Conf. 12.5 - Conservation of and trade in tigers and other Appendix-I Asian big cat species (paragraph 1 i) for maintaining secure stocks);
- Resolution Conf. 11.8 - Conservation of and control of trade in the Tibetan antelope (paragraph 1 d) for maintaining secure stocks);
- Resolution Conf. 10.10 - Trade in elephant specimens (see paragraph 7 c) and e) and 10 a) on maintaining stocks, reporting stockpiles and unsecure stockpiles);
- Resolution Conf. 9.14 - Conservation of and trade in African and Asian rhinoceroses (see paragraph 2 a) for maintaining secure stocks).

2 Resource Materials

CITES Decisions

CITES Decisions usually **remain in effect from** one Conference of the Parties to the next.

Each Party needs to **address CITES Decisions** using national mechanisms.

There are **six** clusters of CITES Decisions concern aspects of stockpile management:

- Decision 18.270, 271– Saiga antelope (*Saiga* spp.) (see paragraph 270 b) for registration of stocks and 271 d) for strengthening stockpile security);
- Decision 18.218, 220, 224 – Sharks and rays (Elasmobranchii spp.) (see 218 b) for assessment of stockpiles, 220 d) for recording stockpiles by the CITES Secretariat, and 224 b) for monitoring of stockpiles);
- Decision 18.159-164 - Disposal of confiscated specimens (concerns ongoing development of guidelines for disposal of specimens, including those that may be part of stockpiles);
- Decision 18.182-185 - Stocks and stockpiles (elephant ivory) (concerns a process to provide guidance on ivory stockpile management, while 184 and 185 consider what actions to take against countries failing to report stockpiles as required);
- Decision 18.94-96 - Malagasy palisanders and rosewoods (*Dalbergia* spp.) and ebonies (*Diospyros* spp.) (94 b) and 95 b) concern the management of timber stockpiles and 96 f) concerns securing timber stockpiles);
- Decision 17.170 (Rev. CoP18) – Stocks and stockpiles (concerns a CITES process for reviewing control of stocks).

3 Resource Materials

CITES Notifications

CITES Notifications are used to communicate with CITES Parties.

CITES Notifications are often used to remind Parties of their reporting obligations.

Two CITES Notifications relating to reporting stockpiles are released on a regular basis:

- No. 2020/078 of 17/12/2020 - Declaration of stocks of rhinoceros horn (notification on annual reporting of rhino horn stocks, including a template for reporting data);
- No. 2020/077 of 17/12/2020 - Elephant ivory stocks: marking, inventories and security (notification on annual reporting of ivory stocks, including a template for summarising stock data).

4 Resource Materials - ivory

Practical guidance for the management of ivory stockpile – documents currently on CITES website

- Ensuring Effective Stockpile Management: A Guidance Document
- Tools to support managing and inventorying (ivory) stockpiles
- Best practice and gold standards for the management of ivory

Ensuring Effective Stockpile Management:

A Guidance Document

By Tom Milliken and James Compton

Acknowledgement

The stockpile management guidance document was produced with financial support of the European Union in the context of the UNODC-CITES Asia Wildlife Law Enforcement and Demand Management Project. The contents of this document are the sole responsibility of TRAFFIC and do not necessarily reflect the views of the European Union. The authors are grateful to the European Union for this support.

INTRODUCTION

In most range States, wildlife specimens such as elephant ivory, rhinoceros horns or pangolin scales continually come into governments' hands through any number of *in situ* wildlife management or law enforcement actions. These activities include the retrieval of valuable parts when natural mortalities are found, whenever dehorning, culling, cropping, problem animal control or other similar management interventions are undertaken, and as part of anti-poaching or anti-trafficking operations in protected areas, at borders, or in internal illegal markets amongst other places. In an era of unprecedented globalised illegal trade, it is also true that ongoing law enforcement actions continuously deliver a range of products from high-profile endangered species to other government authorities throughout the world, with interdictions frequently occurring at points in the trade chain that lie vast distances away from the countries where targeted species naturally occur.

As a result, the development of effective stockpile management systems—which should never be an optional consideration in range States—have now become equally imperative in many transit and end-use destination countries too. This necessity arises from the fact that so many large-scale seizures of target specimens are repeatedly taking place in any number of countries and the security of these products needs to be responsibly addressed through storage until their judicious disposal or ultimate destruction.

As a global concern, the development and implementation of robust stockpile management programmes is essential for:

- reducing the risk of corruption and contraband leakage back into illegal trade;
- safeguarding the evidentiary basis of wildlife trade crime to support investigations, forensic examination and successful prosecutions;
- fostering a culture of custodial accountability and transparency; and
- efficiently delivering on an increasing list of annual international and national reporting requirements.

Concerning this latter point, the importance of secure stockpile management to prevent leakage has been recognised as a major concern under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). A series of CITES resolutions and decisions have mandated the marking of specimens, recording of inventories, annual reporting obligations for a range of government-held stocks of various species, including elephant ivory, rhinoceros horn and pangolin scales (see Annex 2). For countries implementing National Ivory Action Plans or noted in CITES decisions as 'countries of concern' with respect to illegal rhino horn trade, effective stockpile management is a key issue with growing scrutiny and evaluation under the direction of the CITES

TRAFFIC
the wildlife trade monitoring network

Reporting – Res. Conf. 10.10 (Rev. CoP18)

Decision 18.184 – the Secretariat shall:

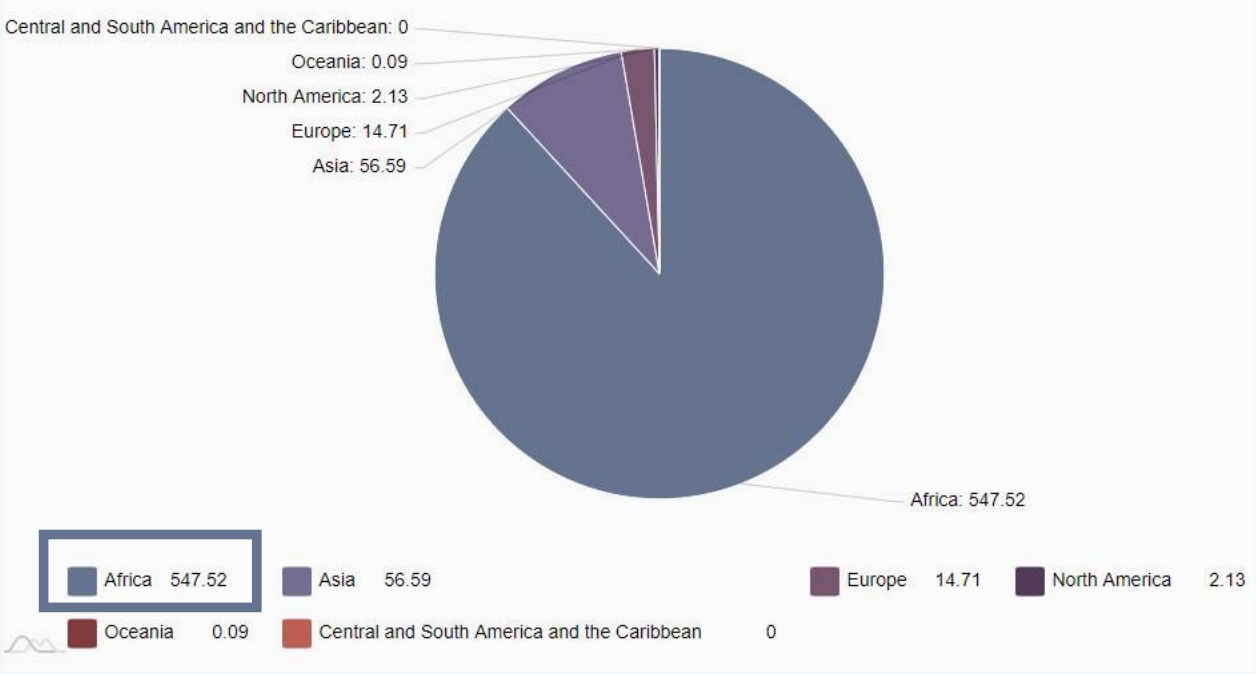
a) **Identify those Parties** that have **not provided information** on level of government held stockpiles of ivory and significant privately held stockpiles of ivory in their territory or where stockpiles are not well secured and **report to the SC** with recommendations as necessary

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

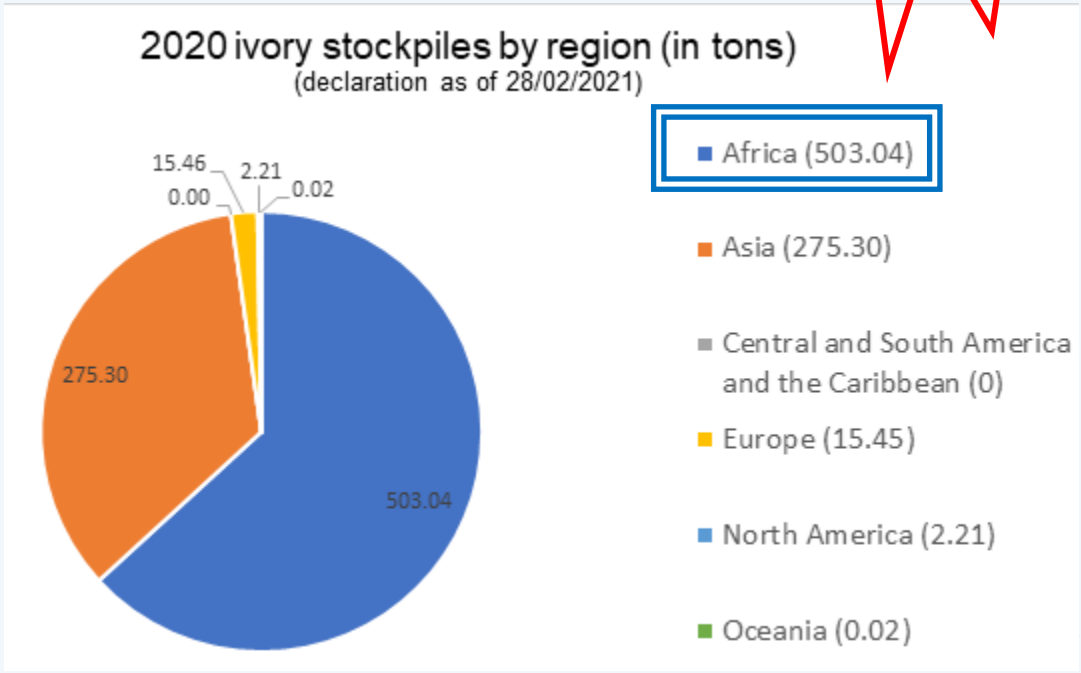
https://cites.org/eng/prog/terrestrial_fauna/elephants

4 range States in eastern Africa reported in 2020/2021

In 2020 (declaration as of 28/02/2020):
796 tonnes of ivory stocks declared by 21 Parties



In 2021:
620 tonnes of ivory stocks declared by 17 Parties



Section 1:

Effective Stockpile Management

Photo taken from Shutterstock by 2630Ben

TRAFFIC
the wildlife trade monitoring network

Objectives:

- Maintaining the chain of custody for, and **identify**, all wildlife specimens in the system;
- **Capturing** all pertinent data as an integral part of the record of each item; and
- Capably producing an **accurate, consolidated and annotated** register of all stocks in the country whenever required;
- Facilitating accurate and timely reporting (national and international)

Key to an effective stockpile management system: Institutionalized processes within government

Facilitate audits and accurate reporting

Effective stockpile management systems:

- Are **legally reinforced** by legislation, regulations and standard operating procedures;
- Have **accountable management structures** and unambiguous governance regimes;
- Clearly designate all administrative and chain of custody **roles and responsibilities** along the pathways and places that stockpile specimens move;
- Provide **detailed guidance** on all procedures for stockpile management; and
- Ensure **up-to-date, readily retrievable records** of each item or overall stockpile status.

Dispelling two confusing misconceptions about stockpile management:

- Understanding a stock inventory does not **constitute management system**. Every stock-taking exercise is just a one-off component within a broader system of stockpile management.
- Even if government policy is focused upon the destruction of stocks, that **does not obviate** the need to develop a stockpile management system.

Basic essential components of robust stockpile management systems are:

Legal Mandate	Roles and Responsibilities	Standard Operating Procedures (SOPs)
Legislation to establish the institutional authority for consolidating, maintaining and disposing of stockpiles.	Implementing regulations to ensure strong internal administrative and security frameworks to support the system.	Detailed guidelines for the operational roll-out of all tasks comprising stockpile management.

Barriers to effective stockpile management include:

- Lack of clarity on responsibility for stockpiles across the chain of custody;
- Poor inter-governmental communication and collaboration;
- Insufficient capacity building and training;
- Inadequate or poor quality inventories;
- Lack of clarity relating to control over the management of primary data; and
- Failure to standardise tracking of stockpile movements.

Other considerations for effective stockpile management include:

- Anticipating and covering the costs of stockpile management;
- The consolidation of stocks in the face of logistical and geographical challenges;
- Specimens that constitute evidence in court proceedings should not be destroyed and all stocks slated for destruction should be subjected to an independent audit; and
- Implications of continued theft and leakage from government stockpiles.

Section 1 COMPLETE!

Take the quiz to test your knowledge...

Section 2:

National Stockpile Management Checklist

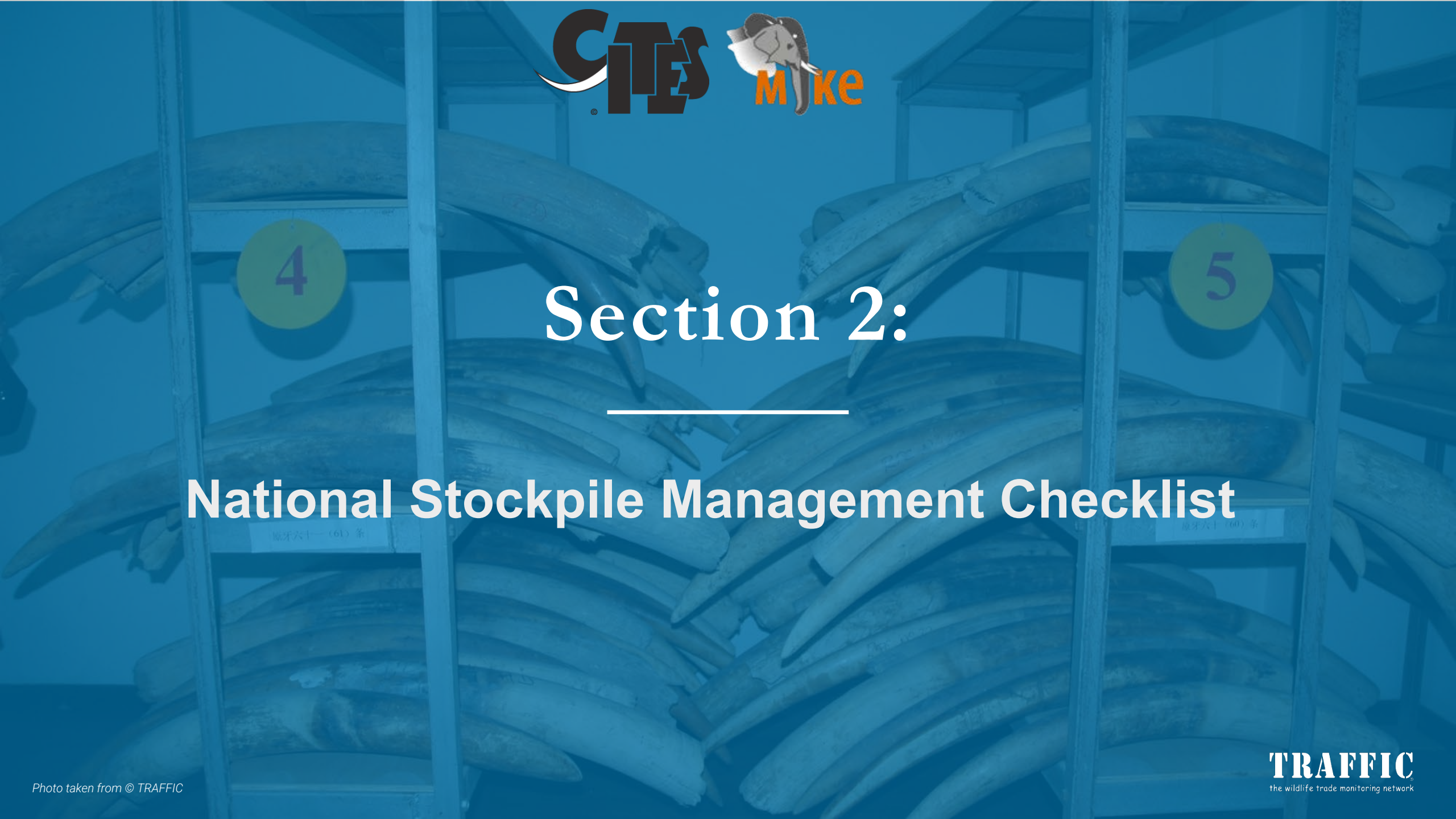


Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

The National Stockpile Management Checklist:

- Is a tool to **take stock** and **evaluate** the status of national stockpile management systems in a systematic and comprehensive manner;
- Promotes understanding of stockpile management using a holistic, integrated approach;
- Is a useful initial step towards developing a new stockpile management systems; or
- Could be used to identify and address critical gaps in existing systems so they can be addressed and strengthened.

The National Stockpile Management Checklist

as a diagnostic tool for assessing the stockpile management system in your country.

However,... it is **not exhaustive** and may require the inclusion of additional questions or issues depending on national circumstances and needs.

Use The Checklist to identify the gaps / areas that require attention and develop a work plan to make the stockpile management system in your country more robust and secure.

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

Establishing a sound legal mandate for stockpile management:

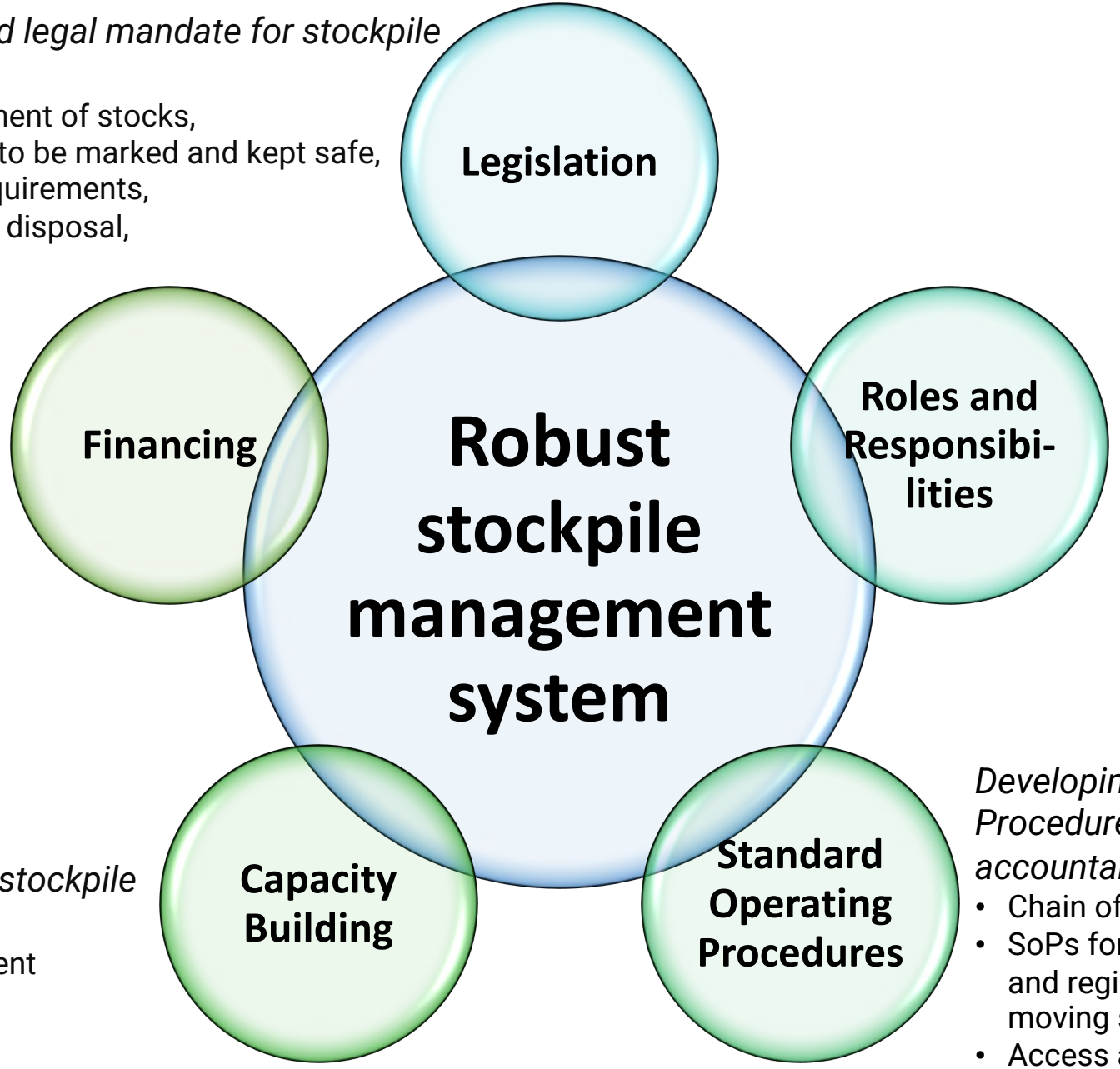
- Authorize management of stocks,
- Specify specimens to be marked and kept safe,
- Specify marking requirements,
- Address process of disposal,
- Audits

Financing the stockpile management programme:

- Financial resources to secure stocks – capital investment (strongroom); recurring costs

Building capacity for stockpile management:

- Training and equipment



Defining institutional roles and responsibilities for effective and secure stockpile management:

- Lead agencies with authorized structure for administration of stockpiles
- Operational protocols
- Coordination mechanisms and structure
- Reporting requirements
- Designated personnel
- ToR / responsibilities included in contracts / workplans

Developing Standard Operating Procedures to promote uniform and accountable stockpile management:

- Chain of custody – SoP
- SoPs for specific functions, e.g., marking and registration, recording information, moving stocks, access to strongroom
- Access and awareness raising

Standard Operating Procedures

SoPs – cover the chain of custody and functional areas

Examples of functional areas that may require SoPs:

- Taking custody of stocks
- Marking and registration
- Recording and reporting of information
- Movement of specimens that are evidence in cases
- Forensic examination
- Transfer to temporary or long-term storage facilities
- Audit procedures

Ensure all relevant staff are trained on the SoPs and have access to the SoPs

Chain of custody							
Item	Quantity	Date/Time	Released by (Name, Signature and ID)	Received by (Name, Signature and ID)	Location	Comments	Description of item/s (including markings and measurements

Finished the checklist? Time to make a Work Plan!

- For every "No" response on the Checklist, capture an appropriate action to be taken to address the matter, if action is required. An example:

No.	Checklist question / aspect	Strategic Action	Lead Responsibility	Other Stakeholders	Resources Required	Timeframe	Constraints/ Comments
1.8	*Establishing a sound legal mandate for stockpile management* - Do regulations mandate periodic audits of government stocks?	Develop and implement regulations that mandate periodic audits to take place (Annual audits).	Ministry of Environment	National Parks and Wildlife Authority; Ministry of Finance	Medium	Mid-term	Engage legal drafter; legislative approval could take time
2.9	*Defining roles and responsibilities* - Are stockpile management responsibilities of key staff assessed during annual performance evaluations?	Ensure that annual performance evaluations of key personnel review and evaluate the implementation of stockpile management duties.	National Parks and Wildlife Authority	Ministry of Environment (HR Division), all regional offices	Low	Short-term	Need formal approval of HR; modify evaluation forms
5.3	*Financing the stockpile management programme* – Capital investment to construct and remodel storage facilities	Prepare budgets for capital investment projects even if they are aspirational future plans.	National Parks and Wildlife Authority	Ministry of Environment; Ministry of Finance	High	Long-term	Need to identify donor; get wider government approval

Section 2 COMPLETE!

Take the quiz to test your knowledge...

Section 3:

How to Conduct A Stock Inventory

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

A Stock Inventory

- is a **systematic, standardised exercise** to mark, register and secure undocumented wildlife products at a particular time and location for inclusion in a country's stockpile;
- constitutes the **most basic, repetitive form of data collection** in stockpile management;
- needs to be conducted whenever **new items** are taken into custody;
- results in an **official** government record of state assets that has **legal** standing; and
- may serve as the **documentary basis** for the physical transfer of stocks to a designated stockpile storage facility.

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

Stock inventories are essential for:

- **quantifying** and **securing** valuable wildlife commodities in government custody;
- supporting law enforcement by **safeguarding evidence** in crime cases and **identifying specimens** for forensic examination;
- providing **legal documentation** for movements of stock from one location to another so that the chain of custody is never broken;
- meeting national or international requirements for **tracking stocks** of target species, and
- contributing to wildlife management policy by **generating species-specific data.**

Ivory sampling in Thailand in 2015.

Stock inventories build the stockpile

- the first stock inventory **establishes the baseline** of any product being stockpiled;
- subsequent inventories **add new stocks** and the stockpile grows; and
- the data of every stock inventory must be **consolidated** in the centralised database.

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

Stock inventory procedures need to be align with CITES requirements by

- incorporating **CITES marking systems** for labelling specimens of products from certain species, like elephants and rhinoceros;
- **identifying** the form or type of specimen involved, separating raw from worked, whole from pieces, and specifying types of worked products;
- collecting **metamorphic data** for each specimen, such as weight or length; and
- **ascertaining the country of origin** of a specimen or the means of acquisition.

Planning a stock inventory

- entails a host of budgetary, logistical and administrative considerations;
- starts by determining the **who, what, where, when and why** behind each inventory event;
- requires **wise logistical scheduling** to allow sufficient time if multiple sites are involved;
- should address subsequent stock movements to designated storage facilities if necessary;
- ensures procurement and availability of necessary equipment at each site;
- requires the deployment of **sufficient manpower**; and
- might consider dual track – **manual and digital** – data collection to enhance accuracy.

Photo taken from © TRAFFIC

TRAFFIC
the wildlife trade monitoring network

Stock inventory material and equipment needs will include:

- materials and equipment for **marking, weighing, measuring** and **handling** specimens;
- **digital cameras** and related paraphernalia if the stock inventory protocol necessitates photographs of each specimen; and
- quantities of printed data collection **forms** for manual data collection and/or computers or other devices to capture digital data.

TRAFFIC
the wildlife trade monitoring network

Standardised data collection formats for stock inventories

- need to be carefully considered to support not only **compliance with CITES** requirements but also **satisfy the information needs of national authorities;**
- will necessarily vary depending on the type and species of wildlife product;
- may need to be produced in both **manual and digital** formats; and
- if digital, the devices for capturing data need to be properly programmed and charged.

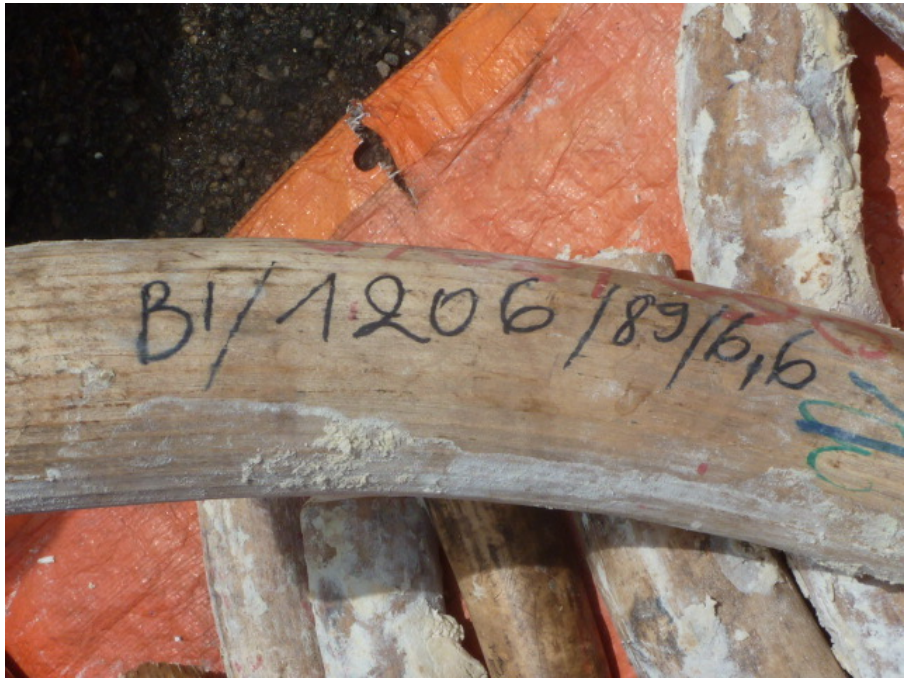


Photo taken from © Tom Miliken

....to be continued

Standardised data collection formats for stock inventories (continued)

- should be arranged in **sequential order** of data entry to allow easy tracking of the number of items in the inventory; and
- always require the **date, place of registration** and **identification of personnel** generating the registration.
- should always capture the **identification marking placed** on each specimen.

Standardised data collection formats for stock inventories (continued)

- should **incorporate CITES marking systems** whenever possible, which for all species minimally usually includes:
  - ✓ a country's two-letter ISO code;
  - ✓ the year of acquisition;
  - ✓ a discreet serial number; and
  - ✓ the weight of the specimen.

  Example from Res Conf 10.10 (Rev. CoP18): KE 00/127/14 Kenya, the year 2000, serial number, 14 kg
- may also include national-level place name codes or other information.

Photo taken from © TRAFFIC

Standardised data collection formats for stock inventories (continued)

- usually require **measurements of specimens**, most typically: **weight in kg**, **length, circumference**, etc.; and
- usually also require the country of origin; the species concerned; the date, place and reason for acquisition; any discreet markings; the case or exhibit number where specimens are part of a law enforcement case; and a comment field for additional information.

Movement of stocks from inventory sites

- will mostly occur to **consolidate** stocks at designated storage facilities;
- may also involve the transport of specimens as **evidence in court cases** or for the purpose of disposal or destruction;
- must be anticipated and accommodated in the work plan to safeguard the chain of custody of the stocks;
- should always rely on **secure transport**, including armed personnel if warranted;

....to be continued

Movement of stocks from inventory sites (continued)

- must only transpire under the **authority** of formal, signed and stamped permits;
- must **precisely identify** all personnel, the specimens involved, the timing, route and means of travel in the permit documentation;
- must ensure sufficient copies of all necessary documents with **signed copies** formally filed at both the original and repository locations as a record of the transaction;

....to be continued

Movement of stocks from inventory sites (continued)

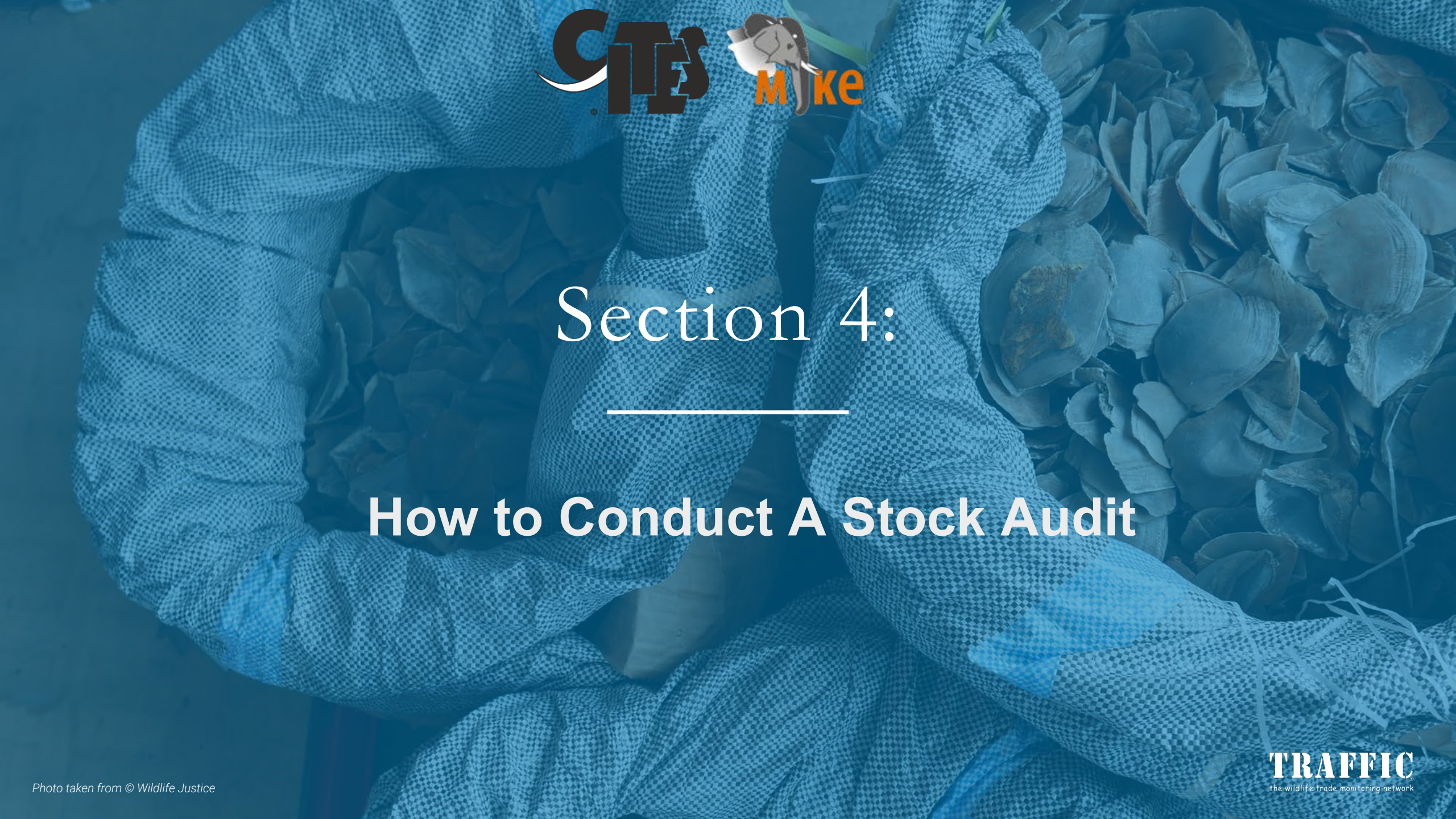
- entails another stock-taking exercise upon arrival at the **final destination** to ensure that every authorised specimen is present for inclusion in the storage facility;
- must **immediately investigate any discrepancies** between what was authorised for transfer and what arrived; and
- necessitates amendment of pertinent registration records to show the change in location once specimens have been fully accepted into the stockpile.

Information management is the backbone of stockpile management

- The data on each stock inventory must be integrated into a **centralised database** that functions as the “master copy” of all registered stocks regardless of physical location;
- Thereafter, changes in location or status of all specimens is tracked centrally, with all records being updated in a timely manner;
- The centralised database provides the outputs needed to meet a country’s internal and external reporting requirements; and
- The centralised database also periodically provides all locations where stockpiles are securely stored, up-to-date accounts that detail all specimens at the site.

Section 3 complete!

Take the quiz to test your knowledge...



Section 4:

How to Conduct A Stock Audit

Photo taken from © Wildlife Justice

TRAFFIC
the wildlife trade monitoring network

A Stock Audit:

- is a **procedure for assessing the status of stockpiles** and the integrity of the administrative and security system around them;
- employs a random sampling of registered specimens to **verify their presence** in an unaltered state and accuracy of the registration data; and
- is executed in accordance with agreed stockpile management policy and pursuant to standardised SOPs.

***NOTE:* The same process can be used for internal monitoring**

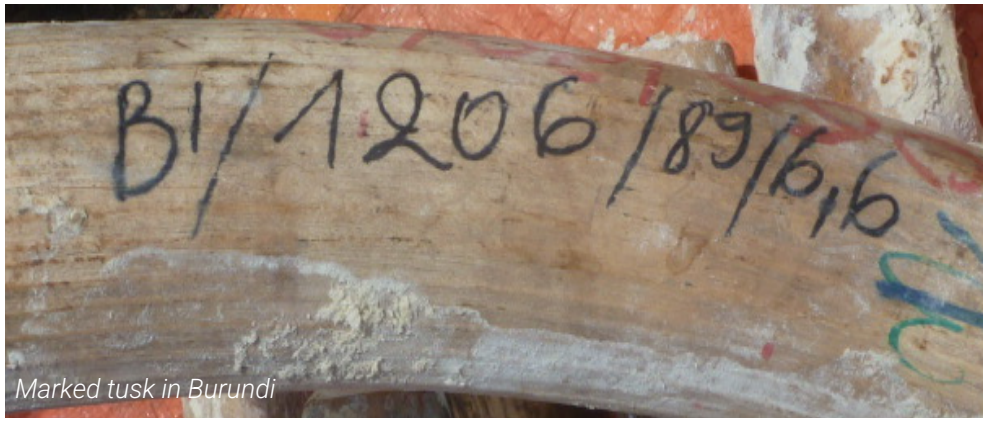
“Best Practice” recommends that stock audits:

- be conducted **periodically** – preferably at least annually – to check the system;
- should also be considered whenever significant stock movements in or out of the stockpile occur;
- should be conducted under the auspices of independent auditors to minimise any conflicts of interest; but
- need to include the **active participation of the storage facility management**, preferably the storekeeper, during the stock checking process.

Photo taken from © Wildlife Justice

Product marking forms the basis of an audit as:

- theoretically, every specimen is individually marked and registered;
- these markings give a unique identity to each specimen forming the basis for auditing; and
- the itemised printout record of all stocks to be audited will most likely be organised sequentially around these markings.



Marked tusk in Burundi

An ivory tusk marked **BI / 1206 / 89 / 6.6** would indicate:

- it was from **Burundi (BI)**
- it was the **1,206th** item registered **(1206)**
- in **1989 (89)**
- with a weight of **6.6 kg (6.6)**

Photo taken from © Tom Miliken

Stock audit material and equipment needs will include:

- an up-to-date, centralised database printout of every specimen in the storage facility organised as a sequential itemised stock registration list;
- materials and equipment for marking, weighing, measuring and handling specimens;
- specialised equipment, for example fork lifts to move stocks, if necessary; and
- sufficient government staff to assist with retrieving and replacing stocks.

To be properly organised, the management team at the storage facility needs to be apprised of the scale and scope of the audit well in advance of the event.

TRAFFIC
the wildlife trade monitoring network

Section 4: How to Conduct A Stock Audit

Step 1 — Working from the **stock registration list** to identify selected specimens in the **stockpile**

- Make a random selection (~5–15%) of specimens in the stockpile register to inspect.
- Find and remove each specimen for examination to confirm stock registration data.
- Note any specimens not found or at odds with the data in the stock registration list.
- Solicit information or reasons from management staff re missing or inaccurate stocks.
- Have the storekeeper co-sign all audit record pages with physical inspection results.

Step 2 — Working from the **stockpile** to identify selected specimens in the **stock registration list**

Opposite of Step 1

- Remove a random selection (~5–15%) of specimens from the stockpile to inspect.
- Locate each specimen in the stock registration list and confirm the data.
- Note any specimens not found or at odds with the data in the stock registration list.
- Solicit information or reasons from management staff re missing or inaccurate stocks.
- Have the storekeeper co-sign all audit record pages with physical inspection results.

Step 3 — Assessment of unmarked stocks

- All specimens in storage should be marked and recorded in the stock registration list.
- The only exceptions would be very recent acquisitions of undocumented stocks.
- The transfer permits of any undocumented stocks should be examined and the specimens checked against the records of the transfer.
- SOP to be checked to determine whether the prescribed guidelines were followed.

Step 4 — General evaluation of management and security

- Assessment of management and compliance with SoPs
- Assessment of security measures in place

Step 5 — Preparation of the audit report

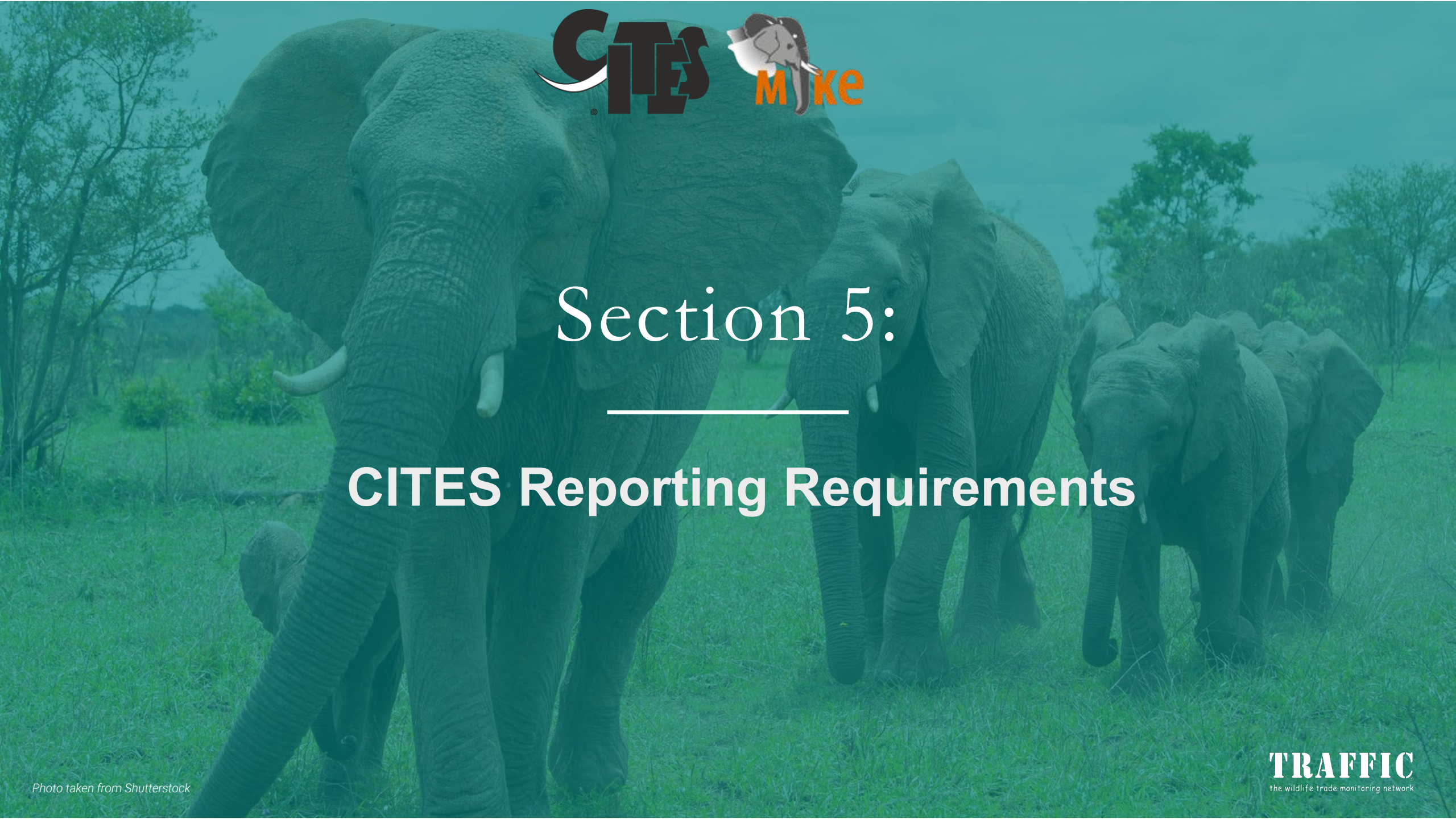
- An official audit report must be prepared in a timely manner.
- The audit report should formally go to designated government authorities as outlined in the SOPs.

5 steps process

Photo taken from © Wildlife Justice

Section 4 COMPLETE!

Take the quiz to test your knowledge...



Section 5:

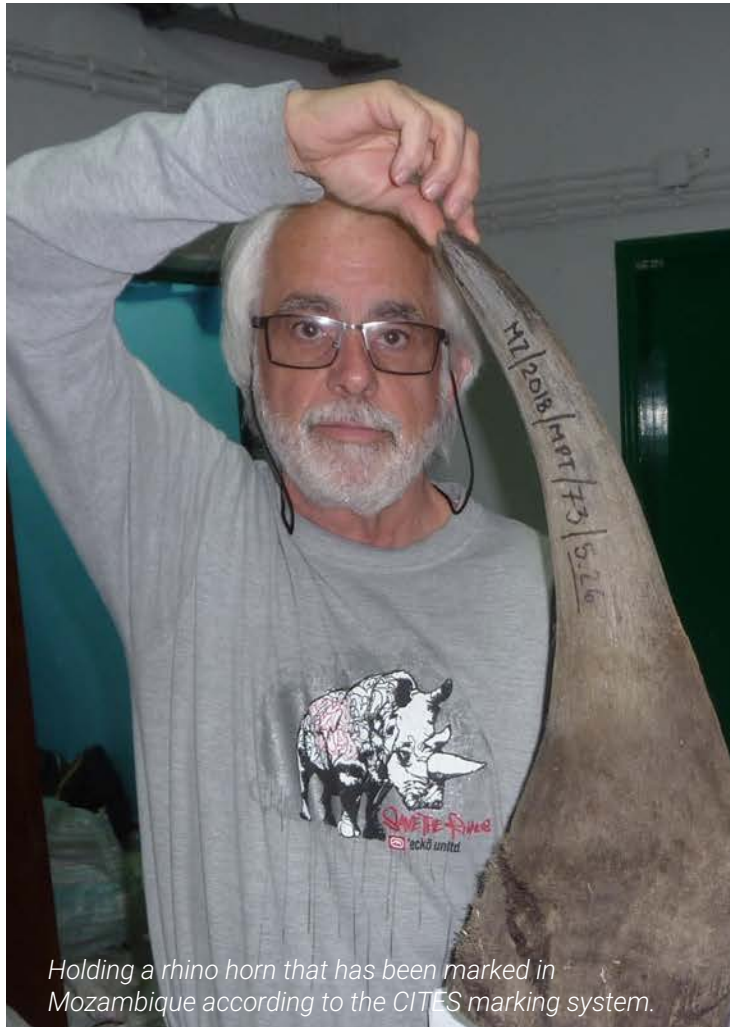
CITES Reporting Requirements

Photo taken from Shutterstock

TRAFFIC
the wildlife trade monitoring network

Reporting requirements:

- Stockpiles of African and Asian elephant ivory, and African and Asian rhinoceros horn need to be annually reported to the CITES Secretariat **by 28th February of each year**.
- The same was true for stockpiles of African and Asian pangolin products in 2018 and 2019.
- Other CITES Resolutions and Decisions call for effective stockpile management, including for tigers and other Asian big cats, Saiga and Tibetan antelope, pythons, sharks and rays, and rosewood timber.



Holding a rhino horn that has been marked in Mozambique according to the CITES marking system.

Photo taken from © Tom Miliken

TRAFFIC
the wildlife trade monitoring network

African & Asian Elephants

CITES Resolution	Resolution Conf. 10.10 (Rev. CoP18)
Species / Products	African and Asian elephants Elephant ivory
Requirement	Maintain and report ivory inventories to CITES Secretariat annually.
Type of Information to Report	▪ Number of pieces ▪ Weight by type of ivory (raw or worked) ▪ Markings in accordance with CITES provisions for marking ivory ▪ Source of the ivory ▪ Reason(s) for any significant changes in the stockpile compared to the preceding year.
When	By 28th February each year

African & Asian Elephants

MODEL INVENTORY FOR THE DECLARATION OF IVORY STOCK

(Notification No. 2020/077)

MODEL INVENTORY FOR THE DECLARATION OF AN IVORY STOCK

Inventories submitted to the Secretariat may be summarized.
However, the following table gives an example that could be used to provide a full inventory.

GOVERNMENT-HELD STOCKS OF ELEPHANT IVORY							
For RAW IVORY							
Identification number (tusk number)	**Date received (dd.mm.yyyy)**	**Country of origin (country name or 'unknown')**	**Type of specimen (e.g. whole tusk or broken piece)**	**Acquisition (e.g. seized, confiscated, found or PAC[1])**	**Weight (kg)**	**Length (cm) (straight line from base to tip)**	**Circumference at widest part (cm)**
data	data	data	data	data	data	data	data
data	data	data	data	data	data	data	data

For WORKED IVORY					
Description	**Date received (dd.mm.yyyy)**	**Country of origin (country name or 'unknown')**	**Source (e.g. seized or confiscated)**	**Weight (kg)**	**Length (cm)**
data	data	data	data	data	data
data	data	data	data	data	data

1 *Problem Animal Control.*

TRAFFIC
the wildlife trade monitoring network

Rhinoceros

CITES Resolution	Resolution Conf. 9.14 (Rev. CoP17)
Species / Products	African and Asia rhinoceros Rhino horns
Requirement	Maintain and report rhino horn inventories to CITES Secretariat annually.
Type of Information to Report	▪ Identification number (if allocated) ▪ Date received (dd.mm.yyyy) ▪ Country of origin (country name or unknown) ▪ Type of specimen (e.g. whole horn or piece) ▪ Acquisition (e.g. seized, confiscated or found) ▪ Weight (kg)
When	By 28th February each year

For rhino horn, the CITES Secretariat does not specify anything in terms of worked rhino horn even though trade in beads, bangles, pendants, small cups and a range of small products are observed in illegal trade.

Rhinoceros

MODEL INVENTORY FOR THE DECLARATION OF RHINO HORN STOCKS
(Notification No. 2020/078)

MODEL INVENTORY FOR THE DECLARATION OF RHINOCEROS HORN

Identification number (if allocated)	Date received (dd.mm.yyyy)	Country of origin (country name or 'unknown')	Type of specimen (e.g. whole horn or piece)	Acquisition (e.g. seized, confiscated or found)	Weight (kg)
data	data	data	data	data	data
data	data	data	data	data	data

Section 5 COMPLETE!

Take the quiz to test your knowledge...

Section 6:

Stockpile Security and Storage

Photo taken from Shutterstock by TH Gregory Zamell

TRAFFIC
the wildlife trade monitoring network

Designated storage facilities are necessary for

- consolidating an ever-increasing stockpile in a **legally-supported, organised** and **accountable** manner;
- ensuring the security of government assets that are often very valuable;
- providing **sufficient space** for long-term storage as well as a working environment conducive for accessing individual specimens whenever required; and
- supporting **effective** law enforcement and the implementation of CITES requirements for the management and disposal of wildlife products in government custody.

The number and distribution of designated storage facilities

- should be based on **maximising** stock security in a cost-effective manner;
- must be **tailored** to the needs and circumstances of each individual country; and
- would greatly benefit from consultative processes between all government and private stakeholders likely to obtain targeted specimens.

....to be continued

The number and distribution of designated storage facilities (continue)

Needs to be supported with a feasibility study that assesses:

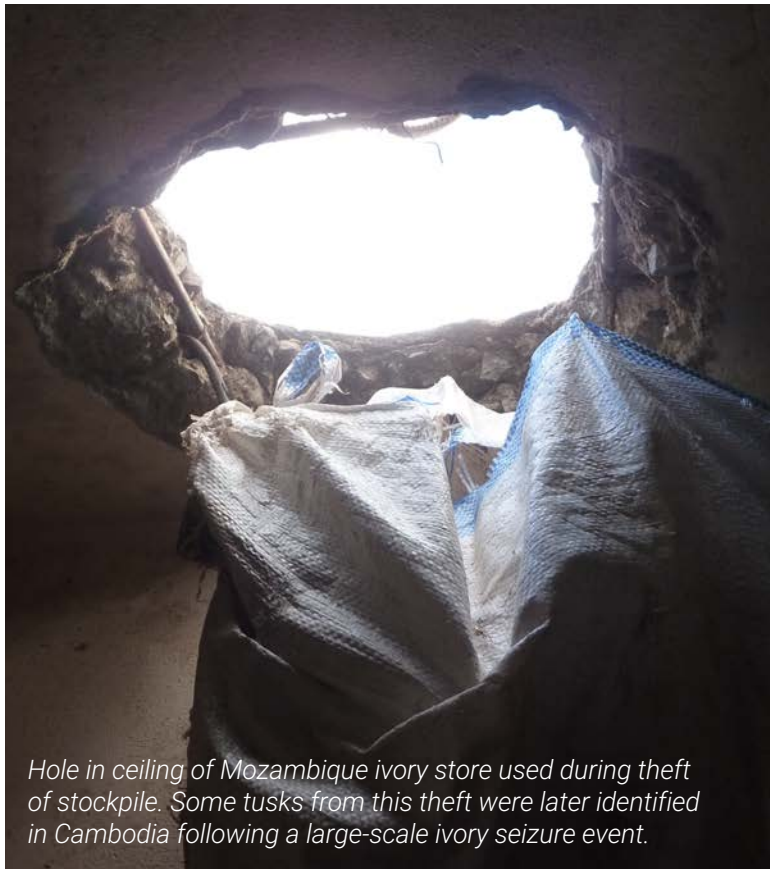
- geographical, infrastructure and logistical issues;
- wildlife management actions and illegal wildlife trade patterns that give rise to stocks;
- prevailing administrative structures and practices;
- law enforcement considerations;
- national security concerns; and
- other issues in each country.

The number and distribution of designated storage facilities (continue)

- should specifically **review** the distance, time and costs of likely stock transfer movements so that economical and secure chain of custody solutions can be anticipated; and
- may **require future modification** of original plans if patterns of illegal trade change or the quantity of stockpiled commodities substantially increases.

Stockpile storage facility options:

- will necessarily vary from country to country;
- could involve a single national storage facility to which all stocks will flow;
- could alternatively comprise a constellation of core (primary) and peripheral (secondary) storage facilities operating in multiple locations in a country; and
- must, regardless of number and design, ensure that all facilities are fully integrated into a stockpile management structure linked to the centralised database.



Hole in ceiling of Mozambique ivory store used during theft of stockpile. Some tusks from this theft were later identified in Cambodia following a large-scale ivory seizure event.

Storage facilities that ensure secure long-term storage

- can take many forms such as:
  - ✓ a simple shipping container; or
  - ✓ a purposefully-built, fortified “bricks-and-mortar” building;
- usually **require capital investment** to build, procure and / or modify with appropriate storage and security features; and
- can often **attract external donors** for funding construction or procurement costs;

….to be continued

Photo taken from © Tom Miliken

TRAFFIC
the wildlife trade monitoring network

Storage facilities that ensure secure long-term storage (continue)

- need to anticipate the type, scale and duration of commodities likely to be stored so they have fit-for-purpose interior design features and adequate working space;
- should avoid the use of rooms, closets or cupboards that were not specifically constructed or outfitted with security in mind; and
- should be thoughtfully located to maximise security and privacy considerations.

Taking measurements of ivory tusk during registration event in Thailand in April 2015.

Photo taken from © Tom Miliken

Container used to store ivory in government compound in Mozambique. The ivory in this container was seized in 2011 at the point of exportation. It was moved to a government compound and situated with its only entry point locked and then placed flush against the trunk of a very large tree. As such, there was no way to gain entry into the container without first employing a fork life to move it. This ivory storage facility was never subsequently pilfered when it was audited in 2019. This illustrates that simple, low-cost storage solutions can be very effective.

Shipping containers as a storage facility

- provide a **low-cost,** ready solution for secure storage;
- can be easily **relocated** if necessary;
- come in two sizes – 20 feet (6.1 m) and 40 feet (12.2 m); and
- can accommodate storage area expansion by placing additional containers next to, or on top of, each other.

Photo taken from © Tom Miliken

TRAFFIC
the wildlife trade monitoring network

Institutional Responsibilities

- should be organised along a **dual track** of administrative duties and security functions;
- need to be **detailed in SOPs** that address each track separately; and
- that are shared – for example the opening and closing of the storage facility – will require a coordinated execution but separate record keeping on what has transpired.

Handling of keys for accessing the storage facility

- requires a **minimum** number of **duplicate keys** securely maintained as back-up;
- the active set of keys should never be in the possession of a single individual but rather **split** between designated administrative and security staff key holders;
- needs to be separately recorded by the Storekeeper and security staff as an immutable record each time the facility is opened;

....to be continued

Handling of keys for accessing the storage facility (Continue)

- requires **formal procedures** for handing over keys to another deputised individual when a designated key holder is to be absent; and
- is supported by **detailed guidelines** for each procedure in the SOPs of both administrative and security staff

Section 6 COMPLETE!

Take the quiz to test your knowledge...