BRIEFING

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ELEPHANT PROTECTION INITIATIVE FOUNDATION

CEFS

CENTER FOR ENVIRONMENTAL FORENSIC SCIENCE

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# WHY MANAGE IVORY STOCKPILES?

# WHY DOES THIS ISSUE MATTER?

## Illegal ivory trade remains a significant conservation and enforcement challenge.

Despite reported declines in the percentage of illegally killed elephants (PIKE) in some regions, recent ivory seizure trends demonstrate that major trafficking networks remain active. According to EIA's Global Environmental Crime Tracker, approximately 21 tonnes of ivory were seized in 15 large-scale seizures between 2023 and October 2026 alone. Eleven seizures, representing approximately 17 tonnes of ivory, involved Southern African Development Community countries and more than 50 per cent of the 21 tonnes were seized in four large-scale seizures in Vietnam, highlighting its continued role as a significant import hub.

The continued occurrence of large-scale seizures shows that government stockpiles continue to grow. The persistence of large-scale seizures highlights the importance of understanding all potential sources of ivory entering illegal trade, including both un(der) reported poaching, privately held stockpiles or possible leakages from government custody.

For the purposes of this briefing, references to government-held ivory extend beyond the definition of "stockpiles" adopted at CoP20. In addition to formally reported stockpiles, we include ivory held by government agencies during enforcement and judicial proceedings, recognising that risks of theft, diversion and leakage can arise throughout the chain of custody from seizure and investigation to prosecution, storage and eventual disposal. This broader approach reflects the reality that responsibility for seized ivory often spans multiple agencies and stakeholders, including, but not limited to, wildlife authorities, customs agencies, police, prosecutors and courts.

Resolution Conf. 10.10 (Rev. CoP20) calls on Parties to maintain inventories of government-held ivory stockpiles, report stockpile information to the Secretariat, ensure stockpiles are adequately secured and strengthen traceability through forensic analysis and other measures. However, significant gaps remain, as highlighted in the Secretariat's report to the 81st meeting of the CITES Standing Committee (SC81 Doc.56). The Secretariat outlines a list of 57 countries globally which may have a stockpile but have not, or inconsistently, reported their stockpiles based on Elephant Trade Information System (ETIS) and Monitoring the Illegal Killing of Elephants (MIKE) analyses. Thirty-three of the 57 countries are elephant range states, suggesting that only 17 out of 50 elephant range state reports are compliant with Resolution Conf. 10.10 (Rev. CoP20). Several of the Parties identified are in the National Ivory Action Plan (NIAP) process, having already been recognised as priorities for strengthened action against elephant poaching and ivory trafficking. The lack of reporting suggests that stockpile management needs significant improvement across the illegal ivory supply chain, from elephant range states to transit and destination.

Renewed attention to ivory stockpiles is urgently needed. This briefing, jointly prepared by the Center for Environmental Forensic Science (CEFS), the Environmental Investigation Agency (EIA) and the Elephant Protection Initiative (EPI) Foundation, examines the current state of stockpile management and reporting.

The briefing includes lessons from stockpile thefts, leakages and corruption cases, practical measures to strengthen stockpile integrity and accountability and the role of forensic science in improving traceability, enforcement and investigations.



# WHAT DOES GOOD STOCKPILE MANAGEMENT LOOK LIKE?

## Good stockpile management is neither complicated nor necessarily expensive.

It depends on secure storage facilities, strong and clearly written standard operating procedures and inventory processes and intra-governmental collaboration (see EPI Foundation Gold Standards for Ivory management reference document). Each location that houses ivory in government custody, including customs, police and wildlife departments needs:

- **a secure location to stock ivory** – this can be a robust lockable cupboard or a large warehouse. Items should be arranged in distinct categories on shelving units – evidence separated from non-evidence and non-evidence divided into origin types: seizures from closed cases, legal deaths; natural deaths. Key control and procedures to enter the storeroom need to be strictly controlled. Each item needs to be labelled clearly with a unique identification number. An initial investment into a storeroom facility for each site is the foundation for effective management

- **documented standard operating procedures** – SoPs need to be agreed by all agencies handling ivory to ensure consistency and standardisation. The SoPs should cover, at least: storeroom management, inventory, chain of custody for recording the movement of ivory and transfer processes. These need to be adhered to at each site to ensure secure, transparent and accountable management. The system can then be replicated for other wildlife products, rather than different systems for different items

- **an inventory** – Ivory and other products, should be inventoried the moment they arrive in the storeroom, using a paper register and a digital inventory system such as the SMS. To comply with CITES Resolution Conf. 10.10 (Rev. CoP20), the inventory data should include: a unique identification number; weight (kg); type of item (worked, raw); source of ivory; country of origin if known; number of pieces and, for whole tusks, circumference at the base and length. However, it is vital to record other information that can be used for forensic and other analyses such as recovery location, recovery date, recovery authority, notable features (hack marks, writing, level of degradation) and type of worked ivory. Conducting an initial inventory to a high standard is time consuming but ensures subsequent updates can be added quickly and easily

A well managed government ivory stockpile.

- **trained staff** – Nominated staff at each site should be trained on the procedures and processes. Central management needs to confirm that all storerooms are adhering to procedures through regular visits and digital data review, otherwise standards will fall

- **centralisation process** – We recommend that ivory and other wildlife products be moved from field storerooms to a more secure central storeroom as quickly as possible to reduce theft risks. This movement should be performed according to strict security requirements and the chain of custody clearly documented. The transfer time is the moment of highest risk for loss of items and mismanagement

- **audits** – Annual audits and regular storeroom checks will confirm whether items remain in custody. This supports CITES compliance, promotes accountability and ensures best practice standards are being met

- **intra-governmental coordination** – It is imperative that all government departments that receive and handle ivory and other wildlife products adhere to the processes outlined here and that they co-ordinate with each other; inconsistent handling of ivory makes it more vulnerable to leakage, diversion and thefts.

Since 2014, the EPI Foundation has supported the strengthening of more than 100 storerooms in 21 African countries (all of them elephant range states) and in the process trained more than 1,600 personnel in secure storage systems. While this has strengthened stockpile management, much more still needs to be done.

# WHAT HAPPENS WHEN STOCKPILE MANAGEMENT SYSTEMS FAIL?

## The risks associated with poorly managed ivory stockpiles are well documented.

Documented thefts, losses and diversions from government storerooms (including customs, police and wildlife departments) demonstrate that stockpiles can become targets for organised criminal networks, corrupt officials and opportunistic actors. While the scale and circumstances vary, a common theme across many cases is the failure of inventory controls and poorly implemented or lack of standard operating procedures (SoPs), oversight and accountability mechanisms.

A review of publicly reported stockpile thefts and leakages during the past two decades reveals incidents involving wildlife authorities, police stores, customs warehouses and other government stockpiles across Africa and Asia (EIA, Global Environmental Crime Tracker). In several cases, substantial quantities of ivory disappeared over extended periods before irregularities were detected. A recurring feature is the alleged involvement of officials or individuals responsible for safeguarding or transferring seized ivory, highlighting the extent to which stockpile integrity depends not only on physical security measures but also on governance, transparency and anti-corruption safeguards.

When stockpile management systems fail, the consequences extend beyond the loss of ivory. Seized ivory often represents the outcome of significant investments in anti-poaching operations, customs controls and criminal investigations. When that ivory subsequently disappears from official custody, these enforcement efforts are undermined and opportunities arise for ivory to re-enter illegal trade.

Many stockpile thefts have triggered investigations and, in some cases, prosecutions. However, information regarding prosecution outcomes, recovery of stolen ivory and remedial actions taken to prevent future incidents is often limited. This lack of transparency makes it difficult to assess whether vulnerabilities identified through one incident have been effectively addressed and whether lessons are being systematically shared across jurisdictions, especially where cases involve multiple transnational criminal organisations.

The importance of effective oversight is further underscored by changes adopted at CoP20 to the general definition of "stockpiles", which exclude all specimens (not just ivory) held under enforcement procedures, in museums and privately held collections. During discussions at CoP20, concerns were raised, including by many African elephant range states, that narrowing the definition of stockpiles would limit reporting, reduce transparency, weaken oversight and create additional blind spots in monitoring systems, potentially increasing opportunities for diversion and leakage into illegal trade.



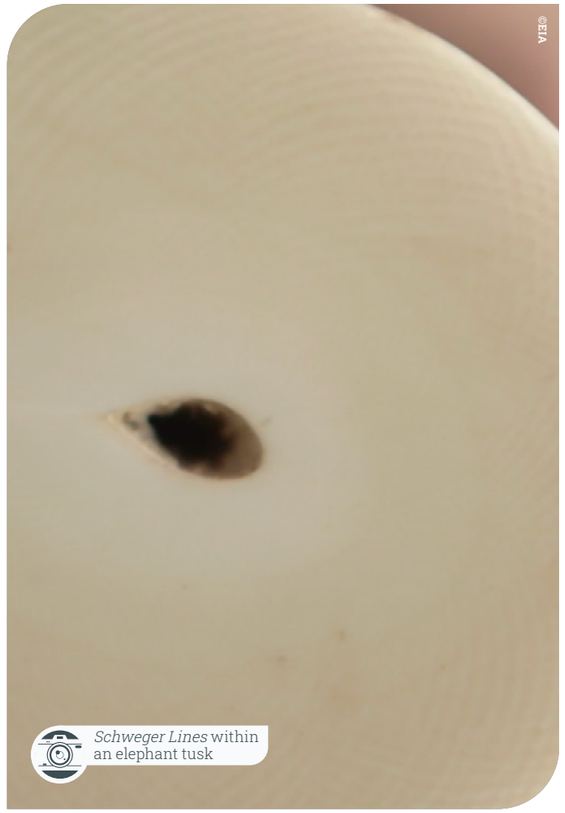
# WHAT DOES FORENSIC SCIENCE CONTRIBUTE TO STOCKPILE MANAGEMENT?

## Stockpiles contain a huge amount of information that could complement intelligence and therefore support law enforcement and conservation efforts.

Seizure sizes vary from small to large. Small sized seizures tend to be apprehended en route to where they will be consolidated into large shipments for export; large sized seizures are an integration of many such small movements. The sampling and genotyping of seizures, taking seizure location, size and date into account, can provide a temporal picture of a country's illegal wildlife trade over time. Such analyses can determine where animals were poached relative to where and when the ivory was seized, as well as identify poaching hotspots, intensity and routes of contraband transport from source to export locations over time. These data can also establish whether the source of the ivory is from in-country or a neighbouring country and hence the extent to which this is an internal or external problem.

The genotyping of stockpiled ivory also creates a deterrent against stockpile theft, enabling re-smuggled ivory to be identified and linked back to the stockpile it came from. Inventory markings serve the same purpose, although handwritten markings can be removed. DNA is permanent and can be identified by matching genotypes of newly seized ivory to those already in the database.

Genetically matching tusks from the same elephant or close relatives in separate seizures can also help target higher level criminals. Tusks and ivory pieces can become separated as they move along the supply chain from source to place of export. Matching samples from the same elephant or close relatives in separate seizures can therefore help connect Transnational Criminal Organisations (TCOs) to multiple crimes as well as to each other. For example, ivory from the Burundi government stockpile was re-smuggled at least seven times between 2016-22, that we know of, and was detected in large seizures trafficked by multiple distinct TCOs. All shipments were connected based on tusks from the same elephants being found in separate seizures. Two of the small seizures containing Burundi ivory, made in east Democratic Republic of Congo along the Rwanda and Uganda borders, helped to reveal how the re-smuggled stockpiled ivory was being moved to neighbouring countries.




*Schweger Lines* within an elephant tusk

Not all handwriting on tusks is written by the authorities post-seizure. Middlemen moving ivory up the supply chain often write identifying initials on tusks to ensure they get paid. Matching initials from the same middlemen within and between seizures can determine the number of middlemen involved, where they are operating and the various TCOs receiving the ivory. Stockpiles provide a highly accessible, inexpensive source of such data.

Combining all the above data with other intelligence can indicate how and why major traffickers respond to external events such as major arrests and changes in access (e.g., new logging concessions, changes in transport opportunities). Such information can contribute to the development and improvement of law enforcement and management strategies. Sharing data between countries that are impacted by the same traffickers can significantly empower the ability of law enforcement to disrupt and dismantle transnational organised crime operating across Africa.

Stockpiled tusks from animals that died of natural causes or from the legal removal of problem animals can also play a vital role in forensic analyses. These known-origin samples are vital to determining where seized samples originated. However, they can only serve that purpose if inventories include reliable data on where those samples were recovered.

# CONCLUSION

## As long as there are elephants, there will be ivory stockpiles.

Effective stockpile management should be treated as a law enforcement, governance and anti-corruption priority, not simply an administrative exercise. But to be effective, stockpile management must be adequately resourced and integrated into broader wildlife crime and anti-corruption strategies. Investment is needed to support storeroom infrastructure, develop standard operating procedures and capacity-building while consistent follow-up on adherence to procedures by all government departments is essential.

Persistent reporting gaps, thefts and leakages demonstrate the need to strengthen accountability, transparency and resilience throughout the stockpile management chain. Where thefts, losses or irregularities occur, investigations should be pursued and, where appropriate, these should lead to prosecutions.

Strengthening deterrence also requires greater transparency regarding enforcement actions and outcomes.

Parties should strengthen implementation of existing CITES provisions relating to stockpile reporting, management and forensic analysis to improve traceability and understanding of trafficking routes and criminal networks. Finally, Parties should reduce the risks associated with long-term accumulation of ivory stockpiles. Where possible, and once relevant investigations and judicial proceedings have concluded, destruction should be the preferred option, but with samples retained to support forensic analysis and future investigations.

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## RECOMMENDATION TO CITES SC81

The Standing Committee should propose the addition of the following recommendations to paragraph 71 in SC81 Doc.56:

x) urge Parties that have never submitted or that have failed to update inventories to do so in accordance with Resolution Conf. 10.10 (Rev. CoP20);

xx) direct the Secretariat to provide guidance and training on stockpile management and reporting, particularly for range States and Parties identified in paragraphs 57-61;

xxx) encourage Parties to conduct forensic analyses on recent and government-held stockpiles to support traceability, enforcement and judicial action, in line with Resolution Conf. 10.10 (Rev. CoP20) and;

xi)urge Parties to include information on the date and discovery location of items in their stockpile inventory.

# FOR FURTHER INFORMATION, PLEASE CONTACT:


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