



Fifth meeting of the signatories to the Memorandum of Understanding concerning conservation, restoration and sustainable use of the saiga antelope

STOCKPILE MANAGEMENT GUIDANCE

CITES Secretariat

14 March 2025

Astana, Kazakhstan

What are stockpiles in CITES?

- CITES 78th meeting of the Standing Committee agreed to the following definition of stockpiles for consideration at the 20th meeting of the Conference of Parties (Nov-Dec 2025, Samarkand).

'Stockpiles' refer to any quantity of legally stored dead specimens, including parts and derivatives, of CITES-listed species held by public or private entities.

Specimens included in permanent collections held by scientific institutions for non-commercial purposes or by individuals as personal or household effects, as well as seized or confiscated specimens still under an enforcement procedure, are excluded from the definition.

In general, provisions related to stockpiles in CITES Resolutions and Decisions are intended to ensure that these are secured, managed and disposed of in such a way that the specimens would not enter or re-enter illegal trade and for specimens of species listed in Appendix I not to be used commercially.

Why is stockpile management necessary?

“to ensure that existing stockpiles are secured and managed in such a way that specimens would not enter or re-enter illegal trade”

Stockpile management is important for:

- Reducing the risk of corruption and theft;
- Maintaining the long-term identity of individual specimens over time;
- Fostering administrative accountability, transparency and “best practices”;

CITES Decisions - saiga antelopes

- 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.

Decision 19.213- 19.217– [Saiga antelope \(*Saiga spp.*\)](#)

Decision directed to: Range States of saiga antelope (*Saiga*) (Kazakhstan, Mongolia, the Russian Federation, Turkmenistan and Uzbekistan), and important consumer and trading countries of saiga parts and derivatives:

- a) The range States of the saiga antelope (*Saiga spp.*) and important consumer and trading countries of saiga parts and derivatives, as identified by the Secretariat on the basis of CITES trade data, should fully implement the measures directed to them in the Medium-Term International Work Programme for the Saiga Antelope for 2021-2025 [MTIWP (2021-2025)], developed in support of the Memorandum of Understanding concerning Conservation, Restoration and Sustainable Use of the Saiga Antelope (*Saiga spp.*) and its Saiga Action Plan; and
- b) Consistent with the measures directed to saiga range States in MTIWP (2021-2025), the range States of the saiga antelope **are encouraged to establish internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products**, and registration of manufacturers and traders, and report such information to the CITES Secretariat.

Решения СИТЕС - Антилопы Сайгаки

- Решения СИТЕС обычно **остаются в силе** от предыдущей Конференции Сторон до следующей.
- Каждой Стороне необходимо **выполнять Решения СИТЕС**, опираясь на национальные

Решения 19.213- 19.217– [Антилопы Сайгаки \(Saiga spp.\)](#)

- **Решение направлено:** Государства ареала обитания сайгака (Сайгак) (Казахстан, Монголия, Российская Федерация, Туркменистан и Узбекистан), а также важные страны-потребители и страны-торговцы частями и дериватами сайгака
 - а) Государства ареала обитания сайгака (Saiga spp.) и важные страны-потребители и страны, торгующие частями и дериватами сайгака, определенные Секретариатом на основе данных о торговле СИТЕС, должны в полной мере реализовать меры, направленные на них в Среднесрочной *международной рабочей программе по сайгаку на 2021–2025 годы* [MTIWP (2021–2025)], разработанной в поддержку *Меморандума о взаимопонимании относительно сохранения, восстановления и устойчивого использования сайгака (Saiga spp.)* и его *Плана действий по сайгаку* ; и
 - б) В соответствии с мерами, направленными на государства ареала обитания сайгака в Среднесрочной перспективной программе (2021–2025 гг.), государствам ареала обитания сайгака рекомендуется установить внутренний контроль на рынке частей сайгака, включая регистрацию запасов, маркировку частей и продуктов, регистрацию производителей и торговцев, а также сообщать такую информацию в Секретариат СИТЕС.

Practical guidance for the management of stockpile



CITES SC78 encouraged Parties to use the Practical Guidance and Ensuring Effective Stockpile Management: A Guidance Document as needed for the management of stockpiles of rhino horn, elephant ivory, pangolin scales and **saiga horn**, as well as stockpiles of other species where the guidance can be applied and provide feedback to the Secretariat on the use of the guidance; and

Ensuring effective stockpile management (EN/RU)

Ensuring Effective Stockpile Management:

A Guidance Document

By Tom Milliken and James Compton

Acknowledgement

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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

Ensuring effective stockpile management ([EN/RU](#))

Annex 1: A checklist to assess the status of stockpile management at the national Level

Annex 3: How to conduct a stock inventory

Annex 4: Stockpile security and storage

Annex 5: How to conduct a stock audit

Training presentation ([EN/RU](#))

Dispelling two misconceptions about stockpile management:

- Undertaking 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 remove the need to develop a stockpile management system.

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.



Photo taken from © TRAFFIC

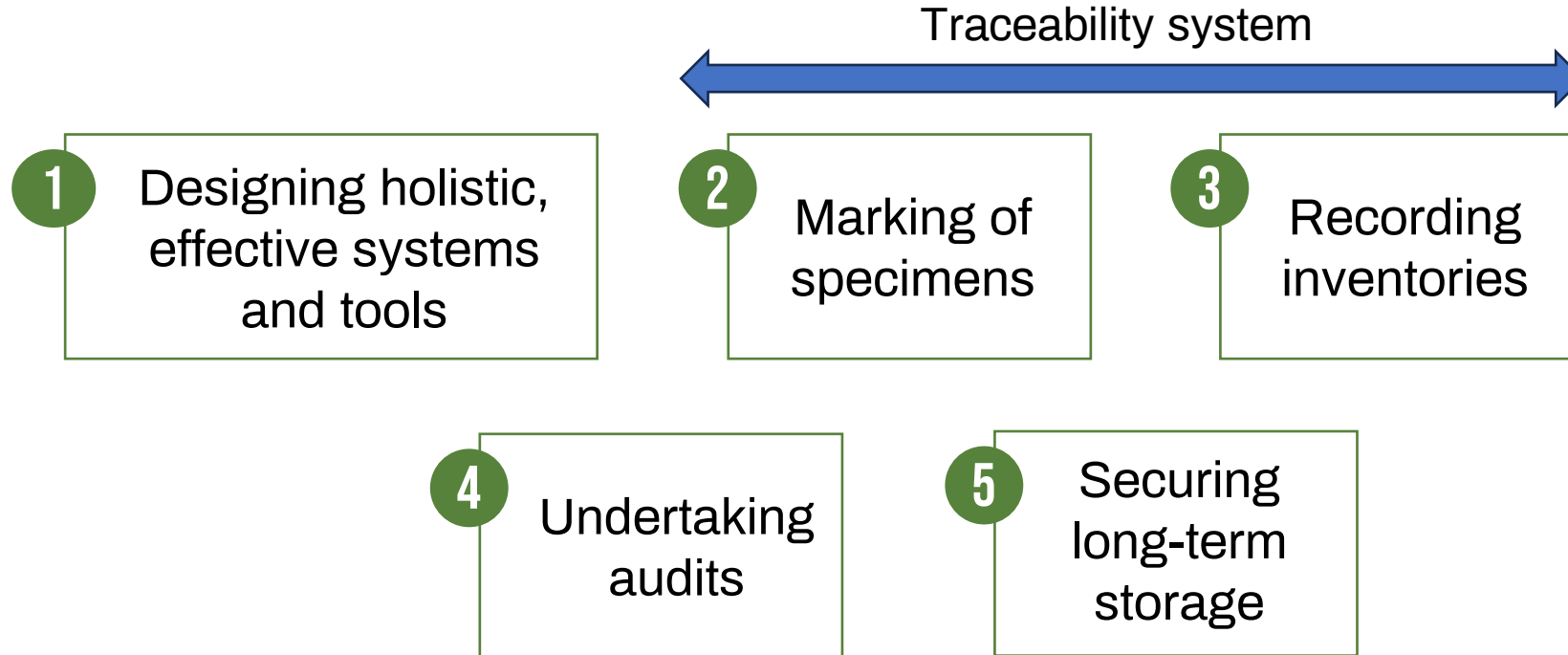
Are there special needs to consider?



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.

Five aspects of stockpile management



Objectives of stockpile management system

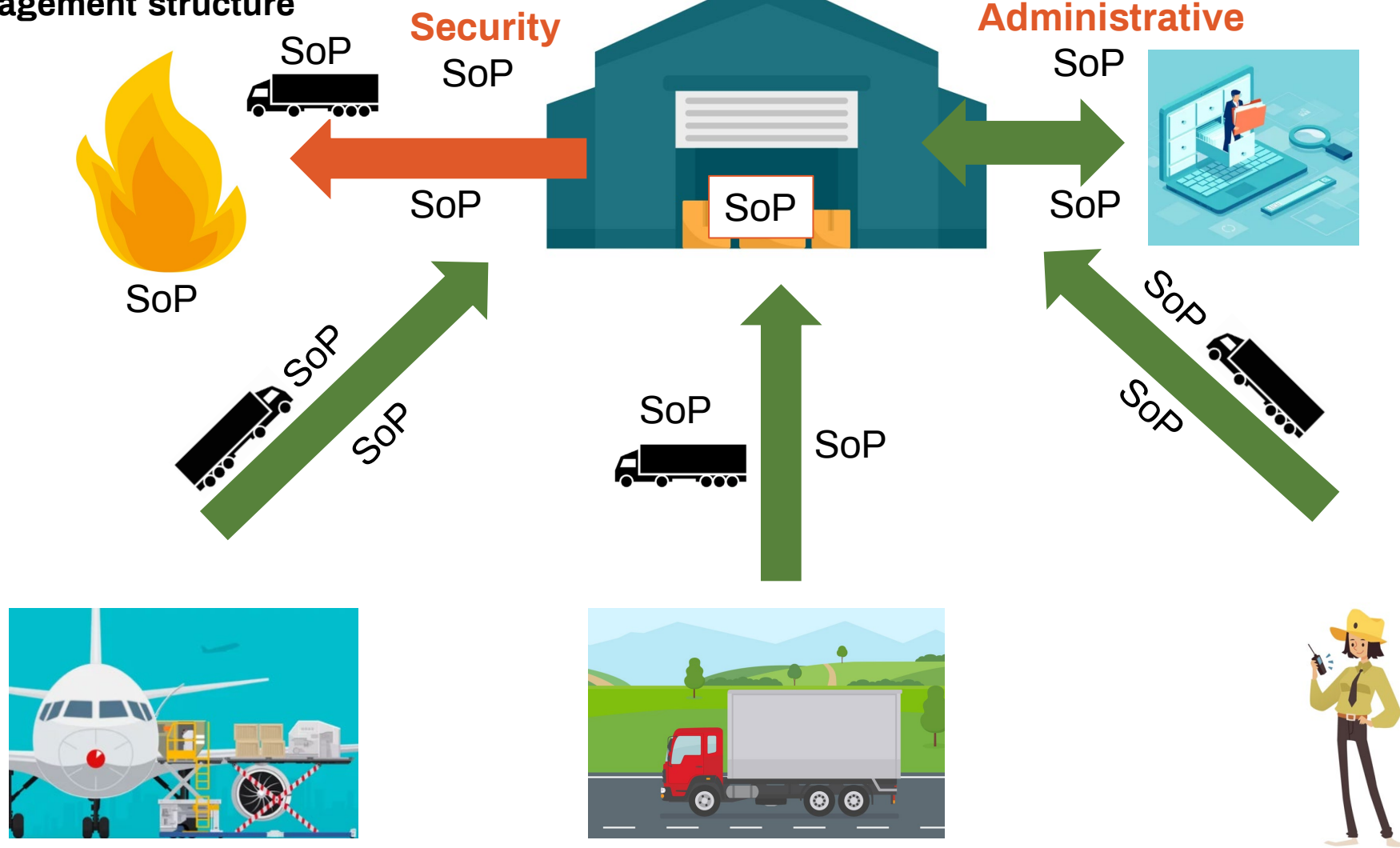
- Maintaining the chain of custody for, and **identify**, all wildlife specimens in the system;
- **Capturing** all pertinent data as an integral part of the record of each item; and
- Capably producing an **accurate, consolidated and annotated** register of all stocks in the country whenever required;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

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



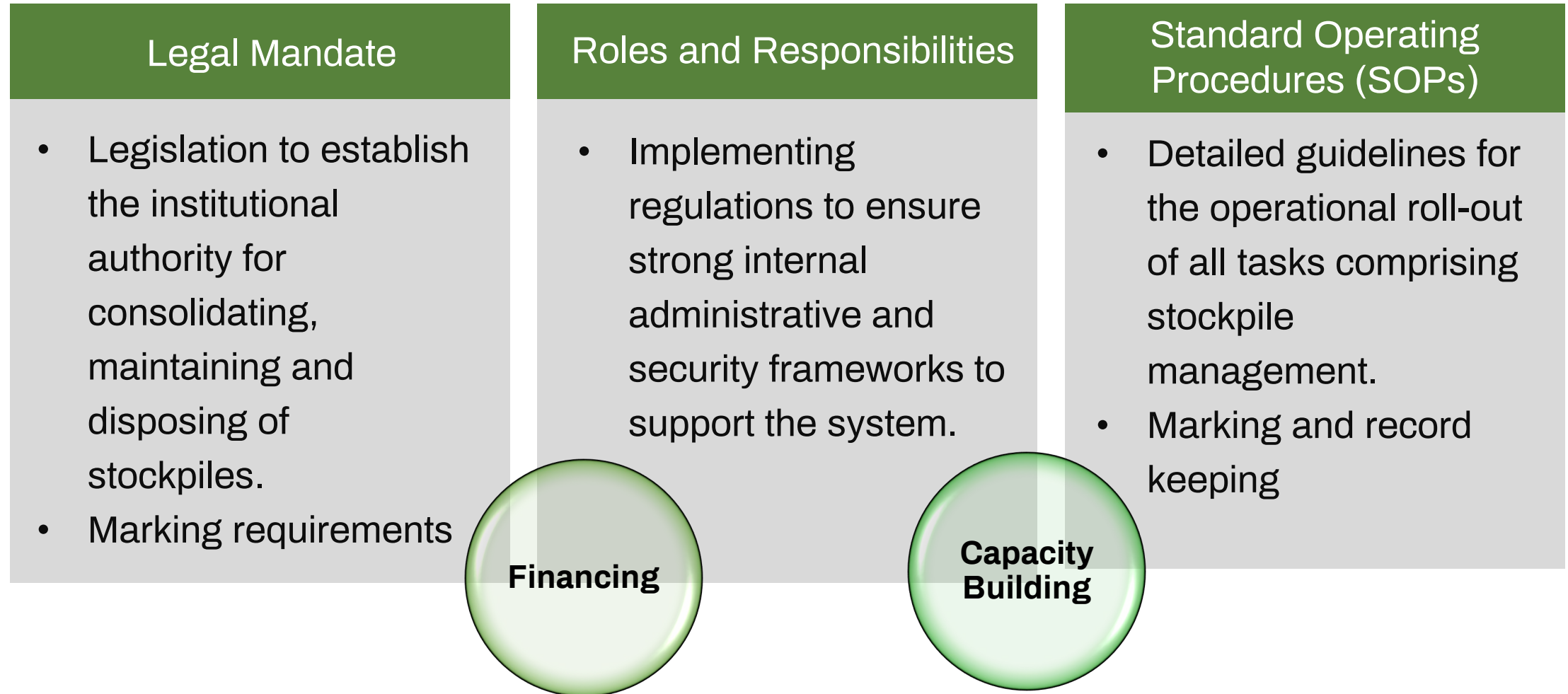
AUTHORITY

LEGAL FRAMEWORK management structure



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Essential components of robust stockpile management systems are:



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;
- Resources (funding, equipments, storage facilities)
- 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.

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

Stock inventories build the stockpile



Ivory sampling in Thailand in 2015.

Photo taken from © TRAFFIC

- 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.

Standardised data collection formats for stock inventories

- usually require **measurements of specimens**, most typically: **weight in kg, length, circumference**, etc.; and
- usually also require the **country of origin**; the species/population concerned; the **date, place and reason for acquisition**; any other relevant information



Information management is the backbone of stockpile management

- Data on each stock inventory must be entered into a **centralised database**
- Changes in location or status of all specimens is tracked centrally
- The centralised database also periodically provides all locations where stockpiles are securely stored, up-to-date accounts that detail all specimens at the site.

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
- should be conducted by independent auditors to minimise any conflicts of interest



Photo taken from © Wildlife Justice

Stock audit - 5 steps

1. Choose a horn from the database → find the horn in the stockpile storage.
Do the information in the database match the information on the horn?
2. Choose a horn in the stockpile storage → find the horn in the database.
Do the information on the horn match the information in the database?
3. If unmarked horns are found, assess and mark them systematically.
4. Evaluate management and security.
4. Prepare an audit report.

5 Steps process

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.

Stockpile security and storage

- Distribution and number of storage facilities (what is safest? And based on population location?)
- Types of storage facility needed (pests and disease)
- Physical security considerations
- Institutional responsibilities
 - Handling of keys
 - Marking and registration of stocks
 - Control of movements

Security storage facilities

- can take many forms such as:
 - ✓ a simple shipping container; or
 - ✓ a purposefully-built, fortified “bricks-and-mortar” building;



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- provide a **low-cost**, ready solution for secure storage;
- can be easily **relocated** if necessary
- usually **require capital investment** to build, procure and / or modify with storage and security features; and
- can often **attract external donors** for funding construction or procurement costs;

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 with 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 each time the facility is opened;
- 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

to be continued

The National Stockpile Management Checklist:

- **diagnostic tool** for assessing the stockpile management system in your country.
 - 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.
- however, it is **not exhaustive** and may require the inclusion of additional questions or issues depending on national circumstances and needs.
- **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.

The National Stockpile Management Checklist:

No.	Stockpile Management Component / Question	Response (Tick one)		Solution to 'No' Response
1.	<i>Establishing a sound legal mandate for stockpile management</i>			
1.1	Is national legislation in place to establish a mandate for one or more lead institutional authority(-ies) to consolidate, maintain, manage and/or dispose of designated wildlife product stocks that come into government custody?	Yes	No	Amend existing or develop new legislation that specifies one or more government authority responsible for stockpile management.
1.2	Does national legislation specify the overarching purpose and basic institutional framework of the stockpile management system?	Yes	No	Amend existing or develop new legislation to outline the general purpose of stockpile management and its basic structure.

№	Компонент/вопрос по управлению запасами	Ответ (отметьте один вариант)		Решение при ответе «Нет»
1.	<i>Создание надежного правового регулирования управления запасами</i>			
1.1	Имеется ли национальное законодательство, устанавливающее полномочия одного или нескольких ведущих институциональных органов по консолидации, хранению, управлению и/или утилизации обозначенных запасов продуктов дикой природы, которые поступают на государственное хранение?	Да	Нет	Внести изменения в существующее или разработать новое законодательство, определяющее один или несколько государственных органов, ответственных за управление запасами.
1.2	Определяет ли национальное законодательство всеобщую цель и основные институциональные рамки системы управления запасами?	Да	Нет	Внести изменения в существующее или разработать новое законодательство, определяющее общую цель управления запасами и его базовую структуру.

Saiga horn stockpile management questionnaire

1. What happens to saiga horn from dead animals (natural mortality, poaching, culling) and seizures?
2. Which authority has the legal mandate for consolidation, maintenance, management and the disposal or destruction of government-controlled stockpiles of horn?
3. For which activities do you have a standard operating procedure (collection, conducting inventories, inter-agency collaboration, data management, marking, security during transport and at storage site?)

Notification to the Parties

End of March

- CITES Secretariat will issue a Notification to the Parties requesting information on:
 - stockpile controls and;
 - other information concerning the management of and trade in saiga specimens

➔ Information to be included in CITES CoP20 document on saiga antelopes



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CITES - COP20
SAMARKAND 2025
UZBEKISTAN

**20th meeting of the Conference of
Parties**
24 November - 05 December 2025
Samarkand, Uzbekistan

- Amendment proposals to add/transfer/remove species from the CITES Appendices
- Adoption of Decisions and Resolutions that will guide the work for the next 3 years

Draft decision to CoP20

- CITES Secretariat to submit draft decisions on the saiga antelope based on:
 - outcomes of the 5th meeting of Saiga MOU signatories,
 - the status of implementation of Decisions 19.213 to 19.217 on Saiga antelope (Saiga spp.) and;
 - the outcomes of the discussion at SC78 to ensure synergy between CITES and CMS and the joint CMS-CITES work programme
- Parties can submit a document to CoP20 with draft decisions on saiga antelopes
 - Guidance is in Resolution Conf. 4.6 (Rev. CoP19)
 - must contain a budget for the work

Conf. 4.6
(Rev. CoP19)*

**Submission of draft resolutions,
draft decisions and other documents
for meetings of the Conference
of the Parties**



Thank you for your attention!



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