A close-up, high-contrast photograph of an elephant's head, focusing on its eye and the texture of its wrinkled skin. A portion of its tusk is visible in the lower right. The background is dark, making the elephant's features stand out.

**TRAFFIC**

January 2024

ESTABLISHING A ROBUST

**NATIONAL**

**IVORY STOCKPILE**

**MANAGEMENT**

**SYSTEM**

(NISMS) IN CAMEROON

# TRAFFIC REPORT

## ABOUT US

TRAFFIC is a leading non-governmental organisation working globally to ensure that trade in wild species is legal and sustainable, for the benefit of the planet and people.

Reproduction of material appearing in this report requires written permission from the publisher.

The designations of geographical entities in this publication, and the presentation of the material, do not imply the expression of any opinion whatsoever on the part of TRAFFIC or its supporting organisations concerning the legal status of any country, territory, or area, or of its authorities, or concerning the delimitation of its frontiers or boundaries.

## PROJECT SUPERVISORS

Sone Nkoke C

## PUBLISHED BY:

TRAFFIC International, Cambridge, United Kingdom.

## SUGGESTED CITATION

TRAFFIC, Central Africa Programme Office. 2024. *Realising a Robust National Ivory Stockpile Management System (NISMS) in Cameroon*. TRAFFIC International, Cambridge, United Kingdom

© TRAFFIC 2024. Copyright of material published in this report is vested in TRAFFIC.

UK Registered Charity No. 1076722

## DESIGN

Cressida Stevens

A grant from the U.S. Fish and Wildlife Service funded this study. The opinions, findings, and conclusions stated herein are those of the authors and do not necessarily reflect those of the USFWS.



Ivory seized by the Ministry of Forests and Wildlife, Cameroon

# ACKNOWLEDGEMENTS

Contributions to the production of this work came from several Government Officials, who generally expressed the wish to remain anonymous. From Cameroon's Ministry of Forestry and Wildlife (MINFOF), the Ministry of Justice and Keeper of the Seals (MINJUSTICE), Cameroon Customs, Police and Gendarmerie, we wish to thank these individuals immensely and extend our gratitude for their assistance. We thank the Consultant, Samuel Nnah Ndobe, for the groundwork of this report. We equally thank experts from the Last Great Ape Organisation, the World Wildlife Fund, and the Zoological Society of London. We thank TRAFFIC staff across the network for their role in reviewing and designing this document, including Denis Mahonghol, Luc Evouna, Luc Tedonzong, and Nicola Okes. Finally, our appreciation goes to Tom Milliken for doing the external peer review.

This Report was made possible with the support of the US Government through the US Fish and Wildlife Service (USFWS) African Elephant Conservation Fund (award # F22AP01375)". The content is the responsibility of the Authors and does not necessarily reflect the opinion of the USFWS or the US Government.

# CONTENTS

---

*page 6*

Executive Summary  
Résumé

---

*page 14*

## **1: INTRODUCTION**

---

*page 18*

## **2: UNDERSTANDING THE CAMEROON CONTEXT: CITES, TRADE AND ELEPHANTS**

---

*page 27*

## **3: ASSESSING EXISTING FRAMEWORKS AND SYSTEMS OF IVORY STOCKPILE MANAGEMENT**

---

*page 40*

## **4: ASSESSING THE CURRENT IVORY STOCK MANAGEMENT SITUATION IN CAMEROON**

---

*page 56*

## **5: ISSUES TO ADDRESS FOR DEVELOPING STANDARD OPERATING PROCEDURES FOR THE NATIONAL IVORY STOCK MANAGEMENT SYSTEM OF CAMEROON**

---

*page 76*

## **6: CONCLUSIONS AND RECOMMENDATIONS**

---

*page 82*

References  
Endnotes  
Image credits

---

*page 86*

## **APPENDICES**

# ACRONYMS AND ABBREVIATIONS

|                 |  |                   |   |
|-----------------|--|-------------------|---|
| <b>BA</b>       | <i>Battues Administrative</i> (a French expression for the selective culling by the wildlife administration or under the directive of the wildlife administration) | <b>LAB</b>        | <i>Lutte Anti-braconnage</i> (Anti-poaching operations)   |
| <b>CAF</b>      | TRAFFIC Central Africa Programme Office  | <b>LAGA</b>       | The Last Great Ape Organisation (an NGO of Cameroon)  |
| <b>CAR</b>      | Central African Republic   | <b>LEA</b>        | Law Enforcement Agency  |
| <b>CBD</b>      | Convention on Biological Diversity   | <b>MINJUSTICE</b> | Ministry of Justice and Keeper of the Seals (of Cameroon)   |
| <b>CBFP</b>     | Congo Basin Forest Partnership   | <b>MIKE</b>       | Monitoring the Illegal Killing of Elephants (CITES elephant monitoring programme administered by the CITES Secretariat)   |
| <b>CITES</b>    | Convention on International Trade of Endangered Species of Wild Fauna and Flora  | <b>MINFOF</b>     | Ministry of Forestry and Wildlife (of Cameroon)   |
| <b>COMIFAC</b>  | <i>Commission des Forêts d'Afrique centrale</i> (Central Africa Forest Commission)   | <b>MN</b>         | <i>Morts des causes Naturelles</i> (Death from natural causes)  |
| <b>CoP</b>      | Conference of the Parties (to CITES)   | <b>NGO</b>        | Non-Governmental Organisation   |
| <b>CPC</b>      | Criminal Procedure Code (of Cameroon)  | <b>NIAP</b>       | National Ivory Action Plan (a CITES programme to support elephant conservation)   |
| <b>DRC</b>      | Democratic Republic of the Congo   | <b>NISMS</b>      | National Ivory Stockpile Management System  |
| <b>EIA</b>      | Environmental Investigation Agency (an NGO of the UK)  | <b>NttP</b>       | Notifications to the Parties (CITES)  |
| <b>EPI</b>      | Elephant Protection Initiative (an NGO of the UK)  |                   | <i>Plan d'Action sous Regional des Pays de l'Espace COMIFAC pour le Renforcement de l'Application des Legislations Nationales sur la Faune Sauvage</i> (Central African Wildlife Trade Law Enforcement Action Plan – CAWLEAP) |
| <b>ETIS</b>     | Elephant Trade Information System (CITES elephant monitoring programme administered by TRAFFIC)  | <b>PAPECALF</b>   |   |
| <b>GEF</b>      | Global Environment Facility  | <b>PV</b>         | <i>Procès-Verbal</i> (Offence report)   |
| <b>IB</b>       | <i>l'ivoire brut</i> (Raw ivory)   | <b>SC</b>         | <i>Scellés des Contentieux</i> (Seals from ongoing litigation)  |
| <b>IF</b>       | <i>l'ivoire frais</i> (Fresh ivory)  | <b>SMS</b>        | Stockpile Management System   |
| <b>ICCN</b>     | <i>Institut Congolais pour la Conservation de la Nature</i> (Congolese Institute for the Conservation of Nature)   | <b>SOPs</b>       | Standard Operating Procedures   |
| <b>INTERPOL</b> | The International Criminal Police Organisation   | <b>ToR</b>        | Terms of Reference  |
| <b>IST</b>      | <i>l'ivoire semi travaillé</i> (Semi-worked ivory)   | <b>TRIDOM</b>     | Tri-National Dja-Odzala-Minkébé transboundary conservation landscape  |
| <b>IT</b>       | <i>l'ivoire travaillé</i> (Worked ivory)   | <b>USFWS</b>      | U.S. Fish and Wildlife Service  |
| <b>IUCN</b>     | International Union for Conservation of Nature (Inter-governmental Organisation)   | <b>VI</b>         | <i>Viel ivoire</i> (Old ivory)  |
| <b>IWT</b>      | Illegal Wildlife Trade   | <b>WiTIS</b>      | Wildlife Trade Information System (TRAFFIC's database system for tracking illegal trade in wildlife)  |
| <b>JPA</b>      | Judicial Police Agent (of Cameroon)  | <b>WWF</b>        | World Wildlife Fund (an international NGO)  |
| <b>JPO</b>      | Judicial Police Officer (of Cameroon)  | <b>ZSL</b>        | Zoological Society of London (an NGO of the U.K.)   |
| <b>JPOGC</b>    | Judicial Police Officers with General Competence (of Cameroon)   |                   |   |
| <b>JPOSC</b>    | Judicial Police Officers with Special Competence (of Cameroon)   |                   |   |



*An African Elephant sprays itself with mud*



# EXECUTIVE SUMMARY

Cameroon harbours important populations of both the Critically Endangered Forest Elephant and the Endangered Savannah Elephant. However, well-documented evidence shows that elephant numbers have plummeted due to a variety of factors, especially poaching and illegal trade in ivory. The actors driving this scourge are also varied, ranging from low-level opportunistic poachers to non-state heavily armed militia groups supplying local ivory traders, carvers, domestic black markets, and Asian-run, African-based transnational crime syndicates operating along illegal trade chains that link Cameroon with neighbouring Central and West African countries to distant end-use consumers primarily in Asia, especially Viet Nam and China.

*An African Elephant* *Loxodonta africana*

**Leakage of elephant ivory from government-held stockpiles has been identified as an important perennial source of raw material fueling illegal commerce. From the report findings, the causes behind this cycle of ivory theft and trafficking include the absence of effective mechanisms to safeguard and track existing stocks, recurring corruption and other governance shortfalls, an accrued lack of capacity and resources, and poorly coordinated actions and awareness between government agencies that come into possession of ivory.**

To mitigate this situation, Cameroon has put into place a series of legal measures to address wildlife management, protection, and crime. The overarching statute is Law No. 94/01 of 20 January 1994, placing the management of forests, wildlife, and fisheries under the auspices of the Ministry of Forestry and Wildlife (MINFOF). The legal framework also serves to implement the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), to which Cameroon has been a Party for over four decades. For example, Order No 0053/MINFOF of 1 April 2020 designates both Forest and Savannah Elephants as Class A protected species, corresponding to the CITES Annex I listing which prohibits commercial international trade.

Regardless, CITES has formally recognised Cameroon as a country of concern in the illegal ivory trade and, since 2015, engaged the country in a remedial oversight process to address illicit trade ivory issues through the implementation of a National Ivory Action Plan (NIAP). Consequently, Prime Ministerial Order No 055/CAB/PM of 06 July 2015 established an Inter-Ministerial Committee to monitor and steer the implementation of Cameroon's NIAP, which includes the development of a robust national ivory stock management system as one of the key activities for addressing ivory trade crime, as well as better reporting of ivory seizure data to the CITES illegal ivory trade tracking programme, the Elephant Trade Information System (ETIS).

Despite these efforts, illegal ivory trade and stockpile leakage remain problematic, with known stockpile leakage having

occurred previously. As a component of the project *"Supporting the implementation of Cameroon's CITES National Ivory Action Plan and reducing the supply of ivory from Cameroon's TRIDOM region, through effective stockpile management"* (which is funded by the U.S. Fish and Wildlife Service (USFWS) and endorsed by MINFOF), the TRAFFIC Central Africa Programme Office directly supports the government's efforts to improve the situation with the contents of this report. The overarching objective of this initiative is to present a comprehensive examination of the status of ivory stockpile management in Cameroon so that targeted follow-on steps can be taken to realise an effective National Ivory Stockpile Management System (NISMS) that is operationally buttressed by detailed Standard Operating Procedures (SOPs). The findings of this report rest upon a comprehensive desktop literature assessment of Cameroon's legal framework, CITES obligations and 'best practice' tools for ivory stock management, the use of comprehensive questionnaire interviews with government officials, and a series of missions to the field to observe current practices first-hand.

As the lead governmental authority for ivory stock management, MINFOF needs to play the principal leadership role in instigating further iterative steps to develop a sound ivory stock management system in Cameroon. In recognition of CITES obligations and CITES-approved 'best practice' guidelines for managing stockpiles, an important initial undertaking should be a comprehensive review to update Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014 (Decision 0003/2014). This decade-old legal instrument defines the country's administrative foundation for ivory stock management, but there are numerous issues which require further consideration to align with CITES and address practical deficiencies of the current system. Some of the key deficiencies include the non-recommitment to implement existing legal mechanisms addressing ivory stockpile management, MINFOF's Decision 0003/2014 that is almost obsolete and not well disseminated; non-recording and untimely reporting of ivory seizures; the persistent failure of reporting seizures to ETIS and the status of the

country's ivory stockpiles to CITES; accrued lack of capacity of MINFOF and other LE Officials, weak operational collaboration and coordination; bad governance, including corruption resulting to leakages; and inadequate financial and material resources.

The findings of this report suggest three parallel tracks of work to be simultaneously addressed. Firstly, with reference to Articles 1, 2, 4, 5 and 7 of Decision 0003/2014, a re-evaluation of the basic definitions and codes concerning sources of ivory and ivory types, the prescribed marking and labelling systems for ivory specimens, and the stock registration process is warranted. This review should ensure that all manual and electronic data collection forms, templates, and registers for capturing seizure, marking, labelling, inventory, and registration data are standardised and formally issued. This process should lead to a series of revisions and amendments to the Decision, as appropriate, to clarify and improve the legal framework supporting ivory stock management.

Secondly, with reference to Article 11 of Decision 0003/2014, as the core pillar of any reliable stockpile tracking system, the utility and operation of the centralised database requires a thorough re-examination. This includes an evaluation of its human resources, overall management protocols, data collection and reporting processes, and the adequacy of equipment, especially hardware and software needs and their functional specifications. As the backbone of ivory stock management, a computerised centralised database inherently should be a sophisticated IT operation that strives to capture and manage detailed information on every specimen of ivory in government custody. At the present time, however, it remains unclear whether the centralised database in Cameroon has a functioning computerised system.

Thirdly, with reference to Articles 8 and 9 of Decision 0003/2014, other concerns point to the need for a resolute reassessment of ivory storage facilities currently used by MINFOF and other LEAs, including the Courts, to ensure that at least the minimum security and accountability measures as recommended in the legal framework are in place and being

implemented. Coupled with this evaluation should be the related issues of ivory stock movements between decentralised authorities and the Courts, and the consolidation of ivory specimens in the centralised ivory storage facility in Yaoundé.

This three-part effort to re-examine and strengthen Decision 0003/214 should collectively and decisively redefine the legal framework, operational structure, and security spheres for a robust and fully functional ivory stockpile management system in Cameroon. To compliment this endeavour, a range of other issues will necessarily come into focus, resulting in the clarification of:

- institutional roles and individual responsibilities of all stakeholders along the chain of custody for ivory specimens;
- channels of communication and collaboration mechanisms between MINFOF and other LEA stakeholders such as Customs, Ministry of Justice (Courts), Police and Gendarmerie;
- timely international reporting of the status of Cameroon's ivory stockpiles and ivory seizures in compliance with CITES obligations and internal reporting requirements; and
- the financial and resource requirements of the system, including recurrent expenditure needs, from a holistic perspective.

The final step should lead to the development of comprehensive SOPs to guide the operational roll-out of the system at every level as an essential element to buttress inter-agency collaboration and standardised performance of routine functions and tasks, including data collection, information management and reporting, at every step of the chain of custody for all ivory specimens under governmental control. In this regard, a sustained programme of capacity building and training for stockpile management in conjunction with the roll-out of detailed written procedural guides will be necessary.

There is no doubt that personnel, logistical and financial considerations of a comprehensive national ivory stock management system will be substantial,

including consideration of recurrent expenditure beyond the initial investment. To accommodate the range of resource needs, careful holistic planning and concerted donor engagement will be required. It is recommended that the Prime Minister's Office should ensure that the costs of implementing the Cameroon NIAP is captured in the national budget and that the NIAP Steering Committee is functionally sustained as a proactive follow-up to Order No 055/CAB/PM of 06 July 2015. Further, the Prime Minister's Office should coordinate actions with other Ministries and government stakeholders to identify and tap

additional funding sources and donors, such as the African Elephant Fund under CITES, the Global Environment Facility (GEF), the Congo Basin Forest Partnership (CBFP), the African Development Bank, the TRIDOM project budget, and other IGOs and NGOs as appropriate.

Whilst much remains to be tackled to realise a dynamic national ivory stockpile management system in Cameroon, this report highlights the salient issues that need to be addressed for that rewarding achievement to occur.



*Ivory chopsticks and beads*

# RÉSUMÉ

Le Cameroun abrite d'importantes populations d'éléphants de forêt « en danger critique d'extinction » et d'éléphants de savane « en danger ». Cependant, des preuves bien documentées montrent que le nombre d'éléphants a chuté en raison de divers facteurs, en particulier le braconnage et le commerce illégal de l'ivoire. Les acteurs à l'origine de ce fléau sont également variés, allant des braconniers opportunistes de bas niveau aux milices non étatiques lourdement armées qui approvisionnent les marchands d'ivoire locaux, les sculpteurs, les marchés noirs nationaux et les syndicats du crime transnationaux dirigés par des Asiatiques et basés en Afrique opérant le long du chaînes du commerce illégal qui relie le Cameroun aux pays voisins d'Afrique centrale et occidentale à des consommateurs finaux éloignés principalement en Asie, en particulier au Vietnam et en Chine.

*African Elephants at sunset*

**La fuite d'ivoire d'éléphant des stocks détenus par le gouvernement a été identifiée comme une importante source pérenne de matière première alimentant le commerce illégal. Les causes de ce cycle de vol et de trafic d'ivoire comprennent l'absence de mécanismes efficaces pour sauvegarder et suivre les stocks existants, la corruption récurrente et d'autres lacunes en matière de gouvernance, un manque accru de capacités et de ressources, et des actions et une sensibilisation mal coordonnées entre les agences gouvernementales qui entrent en possession d'ivoire.**

Pour atténuer cette situation, le Cameroun a mis en place une série de mesures juridiques pour la gestion, la protection et la lutte contre criminalité de la faune. La loi prépondérante est la loi N° 94/01 du 20 janvier 1994 plaçant la gestion des forêts, de la faune, de la pêche sous la tutelle du Ministère des Forêts et de la Faune (MINFOF). Le cadre juridique sert également à mettre en œuvre la Convention sur le commerce international des espèces de faune et de flore sauvages menacées d'extinction (CITES) à laquelle le Cameroun est partie depuis plus de quatre décennies. Par exemple, l'arrêté N° 0053/MINFOF du 1er avril 2020 désigne les éléphants de forêt et de savane comme espèces protégées de classe A, correspondant à l'inscription à l'Annex I de la CITES qui interdit le commerce international.

Quoi qu'il en soit, la CITES a officiellement reconnu le Cameroun comme un pays préoccupant dans le commerce illégal de l'ivoire et, depuis 2015, a engagé le pays dans un processus de surveillance corrective pour résoudre les problèmes de commerce illégal de l'ivoire grâce à la mise en œuvre d'un Plan d'action national pour l'ivoire (PANI). Par conséquent, l'arrêté du Premier Ministre N° 055/CAB/PM du 06 juillet 2015 a mis en place un comité interministériel chargé de suivre et de piloter la mise en œuvre du PANI du Cameroun, qui comprend le développement d'un système national solide de gestion des stocks d'ivoire comme l'une des activités clés pour aborder la criminalité liée au commerce de l'ivoire, ainsi qu'une meilleure communication des données sur les saisies d'ivoire au programme de suivi du commerce illégal de l'ivoire de la CITES, le Système

d'information sur le commerce des éléphants (ETIS).

Malgré ces efforts, le commerce illégal de l'ivoire et les fuites de stocks continuent d'être problématiques. Dans le cadre du projet «Soutenir la mise en œuvre du plan d'action national pour l'ivoire de la CITES du Cameroun et réduire l'approvisionnement en ivoire de la région TRIDOM du Cameroun, grâce à une gestion efficace des stocks» (qui est financé par le **U.S. Fish and Wildlife Service** -USFWS- et approuvé par MINFOF), le Bureau du Programme Afrique Centrale de TRAFFIC soutient directement les efforts du gouvernement pour améliorer la situation avec ce rapport. L'objectif primordial de cette initiative est de présenter un examen complet de l'état actuel de la gestion des stocks d'ivoire au Cameroun afin que des mesures de suivi ciblées puissent être prises pour réaliser un système national efficace de gestion des stocks d'ivoire (NISMS) qui est étayé sur le plan opérationnel par des Procédures d'Opération Standard (SOP). Les conclusions de ce rapport reposent sur une évaluation complète de la documentation sur le cadre juridique du Cameroun, les obligations de la CITES et les outils de « meilleures pratiques » pour la gestion des stocks d'ivoire, l'utilisation d'entretiens complets par questionnaire avec des responsables gouvernementaux et une série de missions sur le terrain pour observer pratiques.

En tant qu'autorité gouvernementale chef de file pour la gestion des stocks d'ivoire, le MINFOF doit jouer le rôle principal de leadership en incitant de nouvelles étapes itératives pour réaliser le développement d'un système solide de gestion des stocks d'ivoire au Cameroun. En reconnaissance des obligations de la CITES et des lignes directrices sur les « meilleures pratiques » approuvées par la CITES pour la gestion des stocks, une première entreprise importante devrait être un examen complet pour mettre à jour la Décision 0003/D/MINFOF/SG/DFAP/SDVEF/SC du 07 janvier 2014 (Décision 0003/2014). Cet instrument juridique vieux de dix ans définit les fondements administratifs du pays pour la gestion des stocks d'ivoire, mais de nombreuses questions nécessitent un examen plus approfondi pour s'aligner sur la

CITES et remédier aux lacunes pratiques du système actuel.

Les conclusions de ce rapport suggèrent trois pistes de travail parallèles à aborder simultanément. Premièrement, en référence aux articles 1, 2, 4, 5 et 7 de la Décision 0003/2014, une réévaluation des définitions et codes de base concernant les sources d'ivoire et les types d'ivoire, les systèmes de marquage et d'étiquetage prescrits pour les spécimens d'ivoire, et le processus d'enregistrement des actions est justifié. Cet examen devrait garantir que tous les formulaires, modèles et registres de collecte de données manuels et électroniques pour la saisie, le marquage, l'étiquetage, l'inventaire et les données d'enregistrement sont normalisés et officiellement publiés. Ce processus devrait conduire à une série de révisions et d'amendements à la Décision, le cas échéant, afin de clarifier et d'améliorer le cadre juridique soutenant la gestion des stocks d'ivoire.

Deuxièmement, en référence à l'article 11 de la décision 0003/2014, en tant que pilier central de tout système fiable de suivi des stocks, l'utilité et le fonctionnement de la base de données centralisée nécessitent un réexamen approfondi, y compris une évaluation de ses ressources humaines, des protocoles de gestion globale et les processus de collecte et de communication des données, et l'adéquation de l'équipement, en particulier les besoins en matériel et logiciels et leurs spécifications fonctionnelles. En tant qu'épine dorsale de la gestion des stocks d'ivoire, une base de données centralisée informatisée devrait par nature

être une opération informatique sophistiquée qui s'efforce de capturer et de gérer des informations détaillées sur chaque spécimen d'ivoire détenu par le gouvernement. À l'heure actuelle, cependant, il n'est pas clair si la base de données centralisée au Cameroun dispose d'un système informatisé fonctionnel.

Troisièmement, en référence aux articles 8 et 9 de la décision 0003/2014, d'autres préoccupations soulignent la nécessité d'une réévaluation résolue des installations de stockage d'ivoire actuellement utilisées par le MINFOF et d'autres organismes d'application de la loi, y compris les tribunaux, pour s'assurer qu'au moins le minimum de sécurité et les mesures de responsabilisation recommandées dans le cadre juridique sont en place et en cours de mise en œuvre. A cette évaluation devraient s'ajouter les questions connexes des mouvements de stocks d'ivoire entre les autorités décentralisées et les tribunaux, et la consolidation des spécimens d'ivoire dans l'entrepôt centralisé d'ivoire à Yaoundé.

Cet effort en trois parties pour réexaminer et renforcer la décision 0003/214 devrait redéfinir collectivement et de manière décisive le cadre juridique, la structure opérationnelle et les sphères de sécurité pour un système de gestion des stocks d'ivoire robuste et pleinement fonctionnel au Cameroun. Pour compléter cet effort, une série d'autres questions seront nécessairement mises au point, ce qui entraînera la clarification de :

- les rôles institutionnels et les responsabilités individuelles de toutes les parties prenantes tout au long de la



Raw ivory tusks

chaîne de possession des spécimens d'ivoire ;

- canaux de communication et mécanismes de collaboration entre le MINFOF et les autres parties prenantes des organismes d'application de la loi telles que les Douanes, le Ministère de la Justice (Tribunaux), la Police et la Gendarmerie ;
- des rapports internationaux en temps opportun sur l'état des stocks d'ivoire du Cameroun et des saisies d'ivoire conformément aux obligations de la CITES et aux exigences internes en matière de rapports ; et
- les besoins financiers et en ressources du système, y compris les besoins en dépenses récurrentes, dans une perspective holistique.

La dernière étape devrait conduire à l'élaboration de SOP complètes pour guider le déploiement opérationnel du système à tous les niveaux en tant qu'élément essentiel pour renforcer la collaboration interinstitutions et l'exécution normalisée des fonctions et tâches de routine, y compris la collecte de données, la gestion de l'information et rapport, à chaque étape de la chaîne de possession pour tous les spécimens d'ivoire sous contrôle gouvernemental. À cet égard, un programme soutenu de renforcement des capacités et de formation pour la gestion des stocks en conjonction avec le déploiement de guides de procédure écrits détaillés sera nécessaire.

Il ne fait aucun doute que les considérations de personnel, logistiques et financières

d'un système national complet de gestion des stocks d'ivoire seront substantielles, y compris la prise en compte des dépenses récurrentes au-delà de l'investissement initial. Pour répondre à l'éventail des besoins en ressources, une planification holistique minutieuse et un engagement concerté des donateurs seront nécessaires. Il est recommandé que le Cabinet du Premier Ministre s'assure que les coûts de mise en œuvre du PANI du Cameroun sont pris en compte dans le budget national et que le Comité de pilotage du PANI est fonctionnellement soutenu en tant que suivi proactif de l'arrêté n° 055/CAB/PM du 06 juillet 2015. En outre, le bureau du Premier ministre devrait coordonner les actions avec d'autres ministères et parties prenantes gouvernementales pour identifier et exploiter des sources de financement et des donateurs supplémentaires, tels que le Fonds pour l'éléphant d'Afrique dans le cadre de la CITES, le Fonds pour l'environnement mondial (FEM), le Partenariat pour les Forêts du Bassin du Congo (PFBC), la Banque africaine de développement, le budget du projet TRIDOM et d'autres organisations intergouvernementales et organisations non-gouvernementales, le cas échéant.

Bien qu'il reste encore beaucoup à faire pour mettre en place un système national dynamique de gestion des stocks d'ivoire au Cameroun, ce rapport sert à mettre en évidence les problèmes saillants qui doivent être résolus pour que cette réalisation gratifiante se produise.





*Elephants often spray themselves with dust, it is thought to protect them from the sun and insects*

# 1: INTRODUCTION

## 1.1 OBJECTIVES

The overarching objective of this report is to present a comprehensive examination of ivory stockpile management in Cameroon so that necessary steps can be taken to realise an effective National Ivory Stockpile Management System (NISMS) that is operationally buttressed by detailed Standard Operating Procedures (SOPs). Whilst the legal framework outlined in the Government of Cameroon's Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014 specifies several actions to be taken for stockpile management, security and reporting, this important first-

generation legal instrument needs to be reviewed, updated and strengthened so that the evolving requirements of CITES Resolution Conf.10.10 (Rev. CoP19) can be fully implemented in the country. Achieving a robust NISMS will also fulfil a key pillar in Cameroon's National Ivory Action Plan (NIAP), which is part of the CITES oversight process to combat illegal trade in ivory. Attainment of a NISMS in Cameroon will enhance accountability and transparency of government-held ivory stocks, preventing future leakage into black market supply chains that fuel ivory trade crime.

**a NISMS in Cameroon** will enhance accountability and traceability, preventing leakage of ivory into the black market

The five specific objectives of this report include:

1. To identify government agencies and personnel at all levels that may be required to play direct or supporting roles in the implementation and operation of an integrated ivory stock management system as part of the fight against illegal trade in elephant ivory and other derivatives.
2. To build the capacity of concerned stakeholders for ivory stockpile management at all stages of the chain of custody, including the provision of operational guidelines for the marking, registration, movement, security, storage, auditing, and reporting of ivory specimens, as well as the development of skills for the timely filing of Elephant Trade Information System (ETIS) data collection forms on ivory seizures and annual stockpile status reports as mandated by CITES.
3. To improve coordination and collaboration between MINFOF and other Ministries and law enforcement agencies in Cameroon that are charged with wildlife law enforcement and security of ivory products within their competencies and jurisdictions to reduce ivory leakage through effective inventory, data collection, and production of records and reports.
4. To identify gaps, deficiencies and problematic issues in existing legislation and regulations that need to be addressed to realise a robust NISMS, including where additional legislative or regulatory mechanisms need to be codified.
5. To begin developing draft SOPs that will form the basis for governing all ivory stock management procedures and actions along the chain of custody for each ivory specimen acquired by the government regardless of the institution involved.

## 1.2 METHODOLOGY

The methodological approach used included desk work to review relevant literature and information, questionnaires and interviews with various stakeholders, and field observations. Collectively, this work enabled a situational analysis to be developed based on a review of existing systems and ‘best practices’ concerning the management and protection of ivory that accumulates from seizures and other administrative interventions.

### 1.2.1 DESK WORK

The assessment of published literature and documents on existing systems and ‘best practice’ was important to establish the context and scope of effective stockpile management systems. The literature review mainly supported the introductory and background part of this work so that a clear understanding of the critical factors that give rise to ivory specimens, such as poaching and illegal trade in elephant ivory and other derivatives, are well understood. The impact of illicit ivory trade on elephant populations is necessarily framed by the imposition of mitigation measures at international, regional, and national levels,

including participation in the NIAP process and the MIKE and ETIS elephant monitoring systems under CITES and implementation of PAPECALF under the Central Africa Forest Commission (COMIFAC) alliance. The need to develop a credible NISMS for Cameroon is inherently linked to these international and regional initiatives. The desktop research effort also served to provide a brief overview of Cameroon and its biodiversity, international wildlife trade, especially the challenges of elephant conservation, the problem of ivory stock leakage and the international context of this work. Concerning documents on existing mechanisms and systems on ivory stockpile management, the following core references were consulted:

- CITES Resolution Conf.10.10 on *Trade in elephant specimens* and related Resolutions, Decisions, Notifications and Recommendations on managing and reporting ivory stockpiles.
- The NIAP Action Plan of Cameroon submitted to CITES in April 2015 and the five progress reports submitted

by Cameroon to the CITES Secretariat between January 2015 and April 2022.

- Decision N° 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014 fixing the rules and procedures for marking, labelling, registration, and storage of administrative ivory.
- CITES guidance documents for ivory stockpile management systems, including Milliken, T., & Compton, J. (2019). *Ensuring Effective Stockpile Management: A Guidance Document*.
- Published reports on regional stockpile management systems, including Elephant Ivory Stocks in the Democratic Republic of Congo: What Management System Should be Put in Place? Mashini, M.C., et Nkoke, S.C. (2020); *Les Stocks d'Ivoire d'Elephant de la République Démocratique du Congo: Quel Système de Gestion Mettre en Place?* TRAFFIC International. Yaoundé, Cameroun and Ringuet, S., et Lagrot, J. F. (2013); and *Développement d'un Système de Gestion des Stocks d'Ivoire au Gabon: Propositions de Standards Minimums*. CITES, Geneva, Switzerland.
- EPI documents on ivory stock management stock taking, including Elephant Protection Initiative, 2019c. Gold Standards for the Management of Ivory & Other Wildlife Products. Document prepared July 2019, 69 pp and Elephant Protection Initiative, 2017. *Ivory Inventory Protocol for Planning and Conducting Ivory Inventories Version 1.4*. Document prepared July 2017.

These documents collectively formed the basis for assessing the requirements of stockpile management and a review of existing frameworks and tools used for that purpose. This effort also informed the process of developing SOPs to support the implementation of a future integrated stockpile management system in Cameroon. These desk-based studies were supplemented by interviews and field visits.

## 1.2.2 INTERVIEWS

Both structured and semi-structured interviews were conducted between 19 December 2022 and 17 February 2023 with relevant law

enforcement agencies (LEAs) and NGOs, following the development of an interview guide and the identification of resource persons based on prior knowledge of their activities and the role they play in wildlife law enforcement. In this manner, individuals involved in ivory seizures and the attendant management of seized products were specifically targeted. Interviewees included officials of MINFOF, Justice, Police, Gendarmerie, and Customs, all of whom have authority to seize ivory products (expatiated in section 4.4), and many wished to remain anonymous. Further, certain staff of TRAFFIC and other NGOs, including the World Wildlife Fund (WWF), the Last Great Ape Organisation (LAGA), and the Zoological Society of London (ZSL) were selected for interviews as these individuals were sometimes directly engaged in assisting government officials to conduct their duties, which involved the seizure of ivory stocks and their subsequent management.

For conducting structured interviews, 61 questionnaires (Appendix 1) were distributed from which 53 responses were received and compiled. This effort yielded an understanding of the current management of seized ivory and other elephant products in Cameroon, the mechanisms used for these purposes, the identification of particular challenges, and proposed recommendations for the mitigation of problematic issues. Semi-structured interviews permitted more open-ended, face-to-face, or virtual discussions (by phone) with selected officials from the different LEAs, NGOs, and select experts. These contacts also focused on getting a general overview of current stockpile management practices, outstanding difficulties, and recommendations on how to enhance the robustness of the system and improve collaboration between the different stakeholders.

Both sets of interviews produced mainly qualitative data which is reported and assessed in sections three and four of this report. In general, the information obtained helped in analysing and comparing the attributes of formal mechanisms advocated by CITES or proposed by MINFOF against what was observed in the field, with the final objective of helping to shape future SOPs and other recommendations for stockpile management.

### 1.2.3 FIELD OBSERVATIONS

Field observations were conducted during missions to Yaounde, Sangmelima, Djoum, Ebolowa, Abong Mbang, Bertoua, and Douala between 3 January to 17 February 2023. This permitted direct and first-hand assessments, resulting in additional information on how existing stockpiles are managed, the identification of gaps and where improvements could be made from a logical and practical standpoint. The selection of locations visited was based on assuring adequate geographic coverage for the project and was informed by a scoping exercise and information from MINFOF and TRAFFIC.

### 1.2.4 LIMITATIONS

It needs to be recognised that there were several limitations related to the research effort of this project. These include:

- The project's geographic focus on the TRIDOM landscape does not directly consider other parts of Cameroon and other transboundary realities, especially concerning the long border with Nigeria on the other side of the country. In this regard,

it should be noted that Cameroon plays a central role in the illegal ivory trade, with products coming from other countries such as the Central African Republic, Chad, Congo, Gabon, and Equatorial Guinea through Cameroon to Nigeria, which serves as a major entrepôt and hub for export to Asian markets.

- The short time frame for this work did not allow more field activities. If additional time in the field had been possible, more first-hand observations and interviews could have transpired, resulting in a better overview of the challenges presently being faced. In this regard, more time would have helped to secure a bigger sampling size with a wider spectrum for analysis.
- Initial reticence from some government officials to give information on ivory stockpile management was also experienced. These individuals had to be persuaded that the information they provided would result in better ivory stock management and they needed to be reassured that their responses would remain strictly confidential.

## Cameroon plays a central role

in the illegal ivory trade, a transit point between other African countries and Nigeria, before export to Asian markets

## 1.3 STRUCTURE OF THE WORK

This report is divided into the following nine narrative sections:

1. **Introduction** – which provides the objectives, scope, and methods of this report.
2. **Understanding the Cameroonian Context: CITES, Trade and Elephants** – which establishes the necessity of ivory stock management in the Cameroonian context with essential background on elephants, wildlife conservation and trade crime, the international ivory trade and mitigation measures and obligations under CITES.
3. **Assessing Existing Frameworks and Systems of Ivory Stockpile Management** – which presents the international legal framework under CITES in detail and reviews regional reports on other stockpile management systems and processes in Central Africa, as well as various guidance documents and tools for stockpile management that CITES promotes.
4. **Assessing the current ivory stock management situation in Cameroon** – which assesses the administrative and legal framework in Cameroon that underpins current ivory stock management practices, including a review of the results of the questionnaire surveys and field visits.
5. **Issues to Address for Developing Standard Operating Procedures for the National Ivory Stock Management System of Cameroon** – which outlines a range of issues that need to be considered during the process of developing SOPs to backstop ivory stock management in the country, including a series of recommendations.
6. **Conclusions and Recommendations** – which highlights the salient conclusions of this report on the stockpile management system in Cameroon and presents 19 recommendations that would support the development of a robust NISMS in the country.



*A verdant landscape in Cameroon*

## 2: UNDERSTANDING THE CAMEROON CONTEXT: CITES, TRADE AND ELEPHANTS

### 2.1 GENERAL BACKGROUND TO CAMEROON AND BIODIVERSITY

Cameroon bridges West and Central Africa and encompasses an intricate mosaic of habitats, ranging from tropical lowland rainforests in the south to mangroves along the Gulf of Guinea coastline, giving way to mountainous vistas, forests, and savannahs as one travels into the interior or moves northward (Hudgens & Trillo, 2003). The forests along the border with Nigeria are the wettest part of Africa and, as such, support the continent's second highest concentration of biodiversity, and most, if not

all, of the country's many endemic species (Nkoke, 2012). With a surface area of 475,442 km<sup>2</sup>, Cameroon is the 53rd largest country in the world (DeLancey & DeLancey, 2000), but ranks 5<sup>th</sup> for fauna and 4<sup>th</sup> for flora diversity in Africa, harbouring 409 species of mammals, 183 species of reptiles, 849 species of birds, 190 species of amphibians and over 9,000 plant species (WWF, 2023). Amongst these species are African Elephants, arguably the world's most charismatic mega-herbivore.

**Cameroon is highly biodiverse**

ranking 5<sup>th</sup> for fauna and 4<sup>th</sup> for flora diversity in Africa

## 2.2 GENERAL INTRODUCTION OF ELEPHANTS

Occurring in a wide variety of habitats (Blanc et al., 2007), African Elephants are the world's largest terrestrial mammal and an animal of considerable economic, ecological, cultural, and aesthetic value to many people (African Elephant Action Plan, 2010). Although long regarded as distinctive subspecies (Wilson & Reeder, 2005), since 2021, the two forms of *Loxodonta africana* are now officially recognised as separate species by the International Union for Conservation of Nature (IUCN). Accordingly, the genus *Loxodonta* was deemed to comprise two extant elephant species: the African Savannah Elephant *Loxodonta africana* and the smaller Forest Elephant *Loxodonta cyclotis*. Further, the IUCN Red List assessment of the same year changed the status of the African Elephants, which was Vulnerable as a single species, to Endangered for the African Savannah Elephant (Gobush, 2022) and Critically Endangered for the African Forest Elephant (Gobush, 2021). These developments were already reflected in Cameroon's Ministerial Order No 0053/MINFOF of 1 April 2020 of the Ministry of Forestry and Wildlife (MINFOF), which recognised Forest and Savannah Elephants as Class A protected species, a listing that corresponds to a CITES Annex I designation.

The Savannah Elephant is the largest land animal, with males standing at 3.2m to 4m at the shoulder and weighing from 3,500kg up to reported 12,000kg; females are smaller, standing about 3 m at the shoulder (Nowak, 1999). Most often, Savannah Elephants are found in open grasslands, marshes and lakeshores (Grzimek, 1990), ranging over much of the savannah and woodland zones, south of the Sahara Desert (Nkoke, 2012). Forest Elephants are usually smaller and rounder, weighing up to 4,500 kg and standing about 3 m tall (Nowak, 1999), with thinner and straighter tusks compared to the Savannah Elephant (Grzimek, 1990). Normally, Forest Elephants inhabit the dense African rainforests of central and western Africa, although occasionally, they roam the edges of tropical forests, thus overlapping with Savannah Elephant home ranges, which can sometimes result in hybridisation between the species (Nkoke, 2012).

Mammal tusks are continuously growing (elodont) anterior teeth (incisors, canines) that protrude from the mouth (Steenkamp, 2003). Elephant tusks are their second upper incisors, which grow continuously; for example, an adult male's tusks can grow at a rate of about 18 cm a year (Nowak, 1999). Tusks are used to dig for water, salt, and roots, to debark trees in order to eat the bark or to get at the pulp inside, or even to move trees and branches when clearing a path (Steenkamp, 2003). They are also used for marking trees to establish territory and occasionally as weapons (Grzimek, 1990). Like humans who are typically right- or left-handed, elephants are usually right- or left-tusked, and the dominant tusk called the master tusk, is generally shorter and more rounded at the tip from wear (Feldhamer et al., 1999). Both male and female African Elephants have large tusks that can reach over 3m long and weigh over 90kg (Nkoke, 2012).

Africa's elephants continuously face many threats, including illegal killing for ivory and other products, conflict with humans, local overabundance, habitat loss and fragmentation, and impacts from climate change. The Forest Elephant range is decreasing rapidly, and the majority of remaining populations are found in six central African countries where the species currently occupies an estimated 25% of its former range (Maisels et al., 2013).

The 2021 IUCN Red List's "Critically Endangered" assessment made the dire statement that "*analysis of estimates from 161 localities across [Forest Elephant] range indicates a reduction of more than 80% of the continental population in the past three generations (93 years) that is understood to be continuing and likely irreversible*" (Gobush et al., 2021).

Although comparatively more numerous and broadly distributed, the Red List's "Endangered" assessment of Savanna Elephants by IUCN states "*analysis of estimates from 334 localities across their global range indicates a reduction of more than 50% of the continental population in the past three generations (75 years) that is understood to be continuing*"

elephant tusks can grow  
**over 3m long and over 90kg in weight**

**the Savannah Elephant**  
is the largest land animal

*and likely irreversible. The continental trend is not, however, spatially uniform; some subpopulations are increasing or stable while others are declining significantly faster than the continental rate. Many local subpopulations have been extirpated” (Gobush et al., 2022). Recent results from aerial surveys in 2022 of the Kavango Zambezi Transfrontier*

Conservation Area (KAZA TFCA - covering five countries and representing over 50% of the remaining Savanna Elephants) suggest that, while spatial variation in dynamics is to be noted, the overall elephant population in the KAZA TFCA appears to be stable (Bussi re et al. 2023).

## 2.3 ELEPHANTS IN CAMEROON: CONTEMPORARY DEVELOPMENTS

Both Savanna and Forest Elephants uniquely inhabit various parts of Cameroon. In the 1930s, elephants were still found in every part of the country (Douglas-Hamilton 1979), but today, they exist in pockets in the northern, south-eastern, and south-western parts of Cameroon, mainly in protected areas. Cameroon’s elephant population presented in the 2016 African Elephant Status Report by the IUCN/SSC African Elephant Specialist Group constitutes the latest available consolidated qualitative data on numbers. For Cameroon, an estimate of 6,830 animals of both species was derived from aerial and dung count surveys, which was augmented by the possible addition of between 1,570 to 2,745 more elephants on the basis of informed guesses for areas

which had not been surveyed (Thouless et al., 2016). These latest figures were considerably diminished from the 1995, 1998, 2002, and 2007 African Elephant Database estimates that suggested Cameroon’s total population, including estimates, were upwards to between 15,387 and 17,241 elephants throughout this period (African Elephant Database, 2023). Still, and significantly, Cameroon continues to host an important but dwindling population of African Forest Elephants (Thouless et al., 2016), found mostly within the Cameroon segment of the Tri-National Dja-Odzala-Mink b  (TRIDOM) transboundary conservation landscape<sup>1</sup>, but numbers are believed to have declined by more than 70% in less than a decade (Ngoran, 2017).

## 2.4 ILLEGAL WILDLIFE TRADE BACKGROUND AND IVORY TRADE

Cameroon’s elephants primarily remain at severe risk from poaching and the illegal ivory trade, exacerbated by threats from ongoing deforestation and habitat loss. Illegal wildlife trade (IWT), in general, is recognised as the second highest threat to biodiversity loss. Wildlife trafficking is frequently viewed as a low-risk, high-profit activity for offenders who face limited penalties (INTERPOL, 2022). Some observers regard IWT as the fourth largest illegal international trade after drugs, counterfeits, and human trafficking, with an annual value estimated at USD19 billion (Hakin, 2011). Driving the illegal killing of elephants is a complex, international ivory trade that thrives on poverty, organised crime, corruption, and greed (Rochon, 2013), not only in African source countries but also in consuming Asian markets, especially those in China and Southeast Asia.

According to domestic ivory market survey findings in Africa (Nkoke et al. 2017), a mix of African and non-African ivory carvers, sellers, and customers are involved. At local, regional, and national levels an ever-changing cast of actors play direct or indirect roles in facilitating illegal ivory trade, including high-ranking administrative, military and judiciary officials (Nkoke et al. 2017)). Collaborative activities include the provision of arms and ammunition to poachers for the acquisition of ivory, assistance to middlemen in the transport of elephant tusks along the trade routes into markets, collection centres and ports of export, and various forms of collusion with traffickers to evade law enforcement actions or avoid judicial punishments (Nkoke et al. 2017).

The increasing presence of Africa-based, Asian-run organised crime syndicates, especially those with links to China and

### Africa-based, Asian-run syndicates

have been a potent feature of ivory trafficking in recent years

Viet Nam, has been an intractable potent feature of illegal trafficking and processing of elephant ivory both inside and outside of Africa in recent years (Milliken et al., 2016; Nkoke et al., 2017; EIA, 2018a; WJC, 2021).

In this regard, the contemporary ivory trade operates as a giant illicit resource transfer from Africa to Asia that is robbing local communities of an important source of potential wealth, destroying the prospects of critical economic sectors such as tourism, and financing a wide range of predatory and corrupt actors across the continent (Vira & Ewing, 2014).

Overall wildlife trafficking threatens security, hinders economic development, and undermines the rule of law in many parts of Africa (US Department of Justice, 2023). In fact, IWT has a long historical presence in West and Central Africa dating back centuries and deeply associated with the colonial period. Focusing on the most recent iteration of this trade since 1975 when CITES took effect, the region has been a well-established commercial source for illegal ivory not only moving out of Africa to overseas markets, but also being sold as worked products in local domestic markets, which in Cameroon have now largely been suppressed through concerted law enforcement actions in recent years (Nkoke et al., 2017). Data from an EIA report indicates that a significant proportion of ivory trafficked globally is sourced from Forest Elephants

in West and Central Africa (EIA, 2020). In Cameroon, the most direct threat to elephants remains their killing for ivory tusks (Nkoke, 2012).

In terms of recent ivory trade developments, the two dedicated programmes under CITES to support elephant conservation – Monitoring Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) – reported a pronounced upward trend in both the poaching of African Elephants and the illicit trade in ivory from 2007 onwards (CITES, 2013; Milliken et al., 2013). These reports to CITES indicate that, in 2011 and 2012, the illegal ivory trade rose to its highest levels in two decades following a sharp increase in the seizure of large-scale shipments of elephant tusks in Africa and abroad (CITES, 2016a; Milliken et al., 2016a, b).

Whilst it is very difficult to establish the precise number of elephants killed annually, the African Elephant Database reported an estimated continental population loss of between 104,000-114,000 elephants between 2007 and 2015 (Thouless et al., 2016), whilst the MIKE programme estimated that annual losses to illegal killing could have ranged as high as 20,826 to 36,734 in 2013 and 2015, respectively, depending on the underlying rate of natural mortality (CITES, 2016b).

## 2.5 IVORY STOCKPILES AND IVORY TRADE

Another key source of ivory in the illegal trade is leakage from government-held stockpiles. In this regard, corrupt administrative, law enforcement or judicial officials illegally sell confiscated or otherwise acquired ivory back into black market trade channels for profit. The problem of effective security for these holdings is an important, unresolved matter. In most countries of Central Africa, including Cameroon, existing mechanisms are insufficient to safeguard valuable ivory stocks, and the development of proper management and security systems are needed to ensure adequate protection (Nkoke et al., 2017). Persistent governance shortfalls and other issues, such as poor storage facilities, continue

to provide avenues for illegal ivory trade based on stockpile losses. Delays in the recording, inventorying, and reporting of seized ivory account for a significant volume of national ivory stockpile leakage at the regional level, giving rise to persistent corruption (Nkoke et al., 2017).

For example, in August 2013, a highly placed Yaounde official was arrested in conjunction with the disappearance of more than 200 elephant tusks from the national stock, some of which were later identified among 18 elephant tusks seized in Douala in June 2013 (LAGA, 2013). Another example is the 2015 sentencing of two court officials in

**the ivory trade**  
robs local communities of potential income

**existing mechanisms are not sufficient**  
in safeguarding valuable ivory stocks from corrupt officials

Yokadouma in the Eastern Region to three years imprisonment for stealing two elephant tusks in their custody at the Yokadouma Court of First Instance (WWF, 2015). In 2015, another case was heard in the Bertoua Military Court against two government officials, a Divisional Officer and a Gendarmerie Officer, for misappropriating 49 elephant tusks in their keeping at Moloundou, also in the Eastern Region (WWF, 2015).

Mashini & Nkoke (2020) indicate that ivory stockpiles often remain in disparate locations, record keeping is generally poor or absent altogether, transparency and public reporting on the status of such stocks is very limited, and gaining access to government-held stocks is highly restricted and involves protracted procedures for obtaining permission or even the most basic information. These systemic weaknesses are compounded by inadequate security measures to safeguard accumulated stocks and poor infrastructure. The inherent lack of robust and transparent mechanisms for effective management also leads to poor compliance at the national level in terms of CITES reporting requirements for elephant ivory (and rhino horn and pangolin scales as well).

According to Nkoke et al. (2017), the extent of Central African stockpile losses has been calculated based on year-to-year comparisons of estimated ivory stock accumulation deriving from ivory seizure data reported to ETIS over a 26-year period from 1990 through 2015. A minimum of some 56,497kg of ivory apparently went missing from government custody in five Central African countries and is presumed to have gone back into the illegal ivory trade (Nkoke et al., 2017). Still in Nkoke et al. (2017), the Republic of Congo (40,507 kg) accounted for 72% of this figure and the Democratic Republic of the Congo (DRC) (7,686 kg) for another 14%, owing mostly to the subsequent disappearance of large ivory stockpiles that had been previously reported in the early 1990s. The Central African Republic (CAR) (4,301 kg), Cameroon (2,837 kg) and Gabon (1,165 kg) accounted for lesser quantities of “lost” ivory during this period, but nonetheless also demonstrated significant stockpile leakage (Nkoke et al., 2017). These figures represent minimum estimates as there are serious knowledge gaps in the status of ivory stockpiles in these countries throughout this period, as well as the salient fact that many (perhaps even most) ivory seizure cases have gone unreported to ETIS (Nkoke et al., 2017).

## 2.6 CAMEROON'S RESPONSES TO WILDLIFE CRIME

Cameroon has undertaken several international, regional, and national initiatives to counter wildlife crime. The country signed and ratified the CITES Convention in 1981, an intergovernmental agreement that aims to ensure that international commercial trade in specimens of wild animals and plants does not threaten their survival. CITES is the leading global instrument for governing international trade in wildlife. In 1992, Cameroon also joined the Convention on Biological Diversity (CBD), a multilateral agreement that encompasses biodiversity conservation, the sustainable use of its components, and the fair and equitable sharing of benefits arising from genetic resources. Cameroon is also one of the African Union's 55 Member States and, since May 2015, has adhered to the “*African Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa*” (Africa Union, 2015).

At the regional level, Cameroon is a Member State of COMIFAC, committing to implement COMIFAC's Central African Wildlife Trade Law Enforcement Action Plan – PAPECALF 2014 (*Plan d'Action sous Regional des Pays de l'Espace COMIFAC pour le Renforcement de l'Application des Legislations Nationales sur la Faune Sauvage*). COMIFAC was established in 1999 through the Yaoundé Declaration that followed a meeting of the Heads of State of Cameroon, Congo, Chad, Equatorial Guinea, Gabon, and CAR. The Declaration establishes a commitment to collaborate and promote the sustainable use of Congo Basin Forest Ecosystems as an integral part of the development process (COMIFAC, 1999).

At the national level, Law No. 94/01 of 20 January 1994, on Forestry, Wildlife and Fisheries was adopted in Cameroon to support wildlife conservation and protection.

Other related national penal and criminal procedure codes are also in force. In theory, these regulatory frameworks should permit an effective fight against wildlife crime, but

continued seizures of wildlife products, including ivory, are indicators that more needs to be done.

## 2.7 CAMEROON'S IVORY TRADE AND CITES

Contemporary cases of illegal ivory trade involving Cameroon abound. In a shocking singular incident in 2012 in Cameroon's Bouba Ndjidda National Park, 650 elephants were killed by heavily armed poachers from Sudan who represented an organised group of armed non-state actors whose operations spanned the Central African region (Lawson & Vines, 2014).

Data held in TRAFFIC's Wildlife Trade Portal (WiTIS) shows that, from 2010 to 2020, there have been 95 seizures made at three major exit points in Cameroon (i.e. Douala, Yaounde and Limbe), and those concerning ivory include 441 elephant tusks, 149 raw ivory pieces, and 397 worked ivory pieces for a total weight of 6,218 kg. A recent example of such trade is the arrest made by Cameroon Police of four wildlife traffickers attempting to smuggle a combined shipment of pangolin scales (from over 300 pangolins) and 300 Forest Elephant tusks to Asia via Nigeria (Kindzeka, 2019). The Last Great Ape Organisation's (LAGA) Cameroon Report for 2020 found that 29% of 39 seizure and arrest cases involved ivory trafficking (LAGA, 2020). Some of these cases resulted in the dismantling of a large trafficking network in Bertoua in the Eastern Region of Cameroon. In October 2020, Customs in Ambam in the Southern Region of Cameroon seized 118 elephant tusks weighing 626 kg (TRAFFIC, 2020), which was the largest seizure made in the area where Cameroon, Gabon, and Equatorial Guinea share national borders.

Cameroon's role in the illegal ivory trade has been highlighted in successive ETIS reports presented in CITES fora. At the 16th meeting of the CITES Conference of Parties (CoP16) in Bangkok in March 2013, the CITES Parties agreed to commence an oversight process directed at selected countries heavily implicated in illegal ivory trade. The core element of this remedial intervention entailed

the development and implementation of tailored, country specific NIAPs to address a range of national issues that facilitate such trade (see Annex 3 of Resolution Conf. 10.10). In the ETIS analysis at CoP16, Cameroon had been identified as a Category B (i.e., second tier) country of concern in the ivory trade. The 'Guidelines to the National Ivory Action Plan Process' establish "the foundation for identifying Parties to participate in the NIAP Process [as] the ETIS report submitted to each meeting of the Conference of the Parties (CoP)". Further, the Resolution mandates that all decisions concerning any country's participation in, or subsequent exit from, the NIAP process must be made by the CITES Standing Committee, the Convention's governing body between CoPs.

Consequently, at its 65th meeting held in Geneva in July 2014, the Standing Committee requested Cameroon to draw up a comprehensive NIAP in the prescribed format and submit it to the CITES Secretariat by 15 May 2015. Since then, Cameroon has remained in the NIAP process, which at the national level is steered by an Inter-Ministerial Committee created by the Prime Ministerial Order No 055/CAB/PM of 06 July 2015. TRAFFIC, pursuant to the USAID-funded Wildlife Trafficking, Response, Assessment and Priority Setting Project (Wildlife-TRAPS)<sup>2</sup>, supported MINFOF in the development and implementation of the first stages of Cameroon's NIAP.

The vision of the Cameroon NIAP is to preserve elephants by reducing poaching and illegal trafficking through the implementation of a series of 18 priority activities specified under six thematic categories: 1. Legislation and Regulations; 2. Legal Proceedings; 3. Intelligence and Investigations; 4. National and International Cooperation on Wildlife Crime; 5. Law Enforcement Operations; and 6. Communication and Public Awareness

**6,218kg**  
**ivory**  
confiscated  
in Cameroon  
across 95 seizure  
incidents between  
2010-2020

(Cameroon Government, 2015; Table 1). Table 1 shows the different priority activities for each of Cameroon's NIAP pillars, all of which are further buttressed by a series of

sub-activities, indicators of success, projected timelines for realisation and identification of responsible agencies for their implementation.

**TABLE 1**  
Cameroon NIAP pillars and priority activities.

| CAMEROON NIAP PILLARS                                       | PRIORITY ACTIVITIES  |
|---|--|
| 1. Legislation and Regulations                              | Incorporating appropriate penalties as part of the process of revising the law for wildlife trade crime.   |
|   | Revising Decree 0648/MINFOF of 18 December 2006 setting the list of animals in protection classes A, B and C, and Decree 649/MINFOF setting the geographical limits for hunting.                                     |
| 2. Legal Proceedings  | Disseminating the legislative and regulatory instruments relating to wildlife to all institutions charged with enforcement (Justice, Customs, Gendarmerie, Police, MINFOF, etc.).                                    |
|   | Training in the major specialised teaching establishments. (i.e., National School of Administration and Magistracy, Police College and Gendarmerie College).   |
| 3. Intelligence and Investigations                          | Establishing a system for information-gathering and investigation.   |
| 4. National and International Cooperation on Wildlife Crime | Setting up platforms for national cooperation.   |
|   | Strengthening and operationalising the arrangements for tracking the implementation of the NIAP.   |
|   | Building up international cross-border cooperation to combat poaching.   |
| 5. Law Enforcement Operations                               | Securing the administration of ivory stocks.   |
|   | Capacity-building in contraband detection.   |
|   | Enhancing controls at the country's entry/departure points (seaports, airports, checkpoints, barriers at the borders, etc.).   |
|   | Intensifying crackdown operations in the areas where the pressure on elephants is severe and high levels of ivory trafficking (e.g., Boumba Bek national park, Nki, Lobéké, Dja, Bouba Ndjidda, Bénoué, Faro, Waza). |
|   | Operational capacity-building for the enforcement services.  |
|   | Improving the collection of ETIS data.   |
|   | Enhancing the tracking of wildlife cases.  |
| 6. Communication and Public Awareness                       | Raising stakeholder awareness of the arsenal of legal instruments for combating poaching and illegal trade.  |
|   | Coordinating with personnel from airlines and those working at river and land locations on the smuggling of wild species.  |
|   | Publicising the activities related to combating wildlife crime.  |

NIAP implementation has been subjected to an annual review by the Standing Committee to track progress. Since 2013, 23 CITES Parties have participated in the NIAP process, of which ten have successfully achieved their goals to the satisfaction of the CITES Standing Committee and subsequently exited the oversight mechanism. Currently, 13 countries, including Cameroon continue to implement NIAPs. In Cameroon's NIAP, one of the recognised priority actions was "Securing the administration of ivory stocks". Toward that

end, three short-term priority actions were to be taken:

1. Carrying out an independent audit of the systems for storage and management of the ivory seized;
2. Enhancing the security of the ivory storage facilities; and
3. Collecting and securing all the ivory seized (courts, decentralised departments of MINFOF).

The realisation of “securing the administration of ivory stocks” through these three priority activities essentially commits Cameroon to the development of a NISMS as a key output in the context of its NIAP participation. Realising this goal would effectively ensure that Cameroon fulfils a NIAP goal so that the country can eventually exit the CITES oversight process. This initiative would also serve to establish the basis for meeting annual reporting obligations to the CITES Secretariat on the status of ivory stockpiles with accuracy. In the most recent NIAP progress report covering the period July 2018 to April 2022, the Cameroon government regarded these three activities as “substantially achieved”, “on the right track” and “substantially achieved”, respectively. However, in sharp contrast, at its 75th meeting of in November 2022 which reviewed the report, the Standing Committee regarded Cameroon’s NIAP progress in a very different light and gave “an overall rating of ‘limited progress’ and encouraged Cameroon to intensify its efforts to seek funding for the effective implementation of its NIAP”.

Accordingly, the effective management of national ivory stockpiles has been a longstanding focus within CITES. Since CITES CoP16, the Parties agreed that reporting of ivory stocks in the hands of government authorities should occur annually. Resolution Conf. 10.10 (Rev. CoP16) was amended to mandate that all Parties:

*Maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and 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.*

To assist the Parties in this regard, CITES Decision 17.171 directed the Secretariat to “develop practical guidance for the management of ivory stockpiles, including their disposal, based on an analysis of best

*practices and in accordance with provisions in Resolutions Conf. 17.8 on Disposal of illegally traded and confiscated specimens of CITES-listed species and Resolution Conf. 10.10 (Rev. CoP17) on Trade in elephant specimens” (CITES, 2018). The importance of having operative best-practice ivory stock management systems is increasingly being recognised at the international policy level (Nkoke et al., 2017). CITES has responded by creating a portal on this topic on its website addressing “Practical guidance for the management of ivory stockpiles, including their disposal” (CITES 2023), which states that:*

- *Accumulations of elephant ivory will occur in many Parties due to the 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 perpetrators have not removed the tusks.*
- *In relation to confiscated and accumulated dead specimens of Annex 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.*
- *Concerning ivory that is stored, Resolution Conf. 10.10 (Rev. CoP18) on Trade in elephant specimens, paragraph 7e) 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.*

Several important areas of work are still to be addressed in Cameroon to fulfil its NIAP commitments, as highlighted in a report by the Environmental Investigation Agency (EIA) that comparatively assessed progress by countries

## at CITES CoP16

Parties agreed on annual reporting of the government’s ivory stocks

in the NIAP process (EIA, 2018b). Outstanding issues for Cameroon included creating a robust national ivory stockpile management system (NISMS) and building capacity for its effective implementation. Activities such as improved coordination between law enforcement agencies, better and more timely reporting of ivory seizure information to ETIS, and annual reports on the status of ivory stockpiles and NIAP implementation to the CITES Secretariat need to be reinvigorated. Key concerns from the EIA Report and the Wildlife-TRAPS project evaluation on Cameroon's NIAP include:

- **Inadequate ivory stock management:** Cameroon still lacks an accountable, transparent ivory stock management system that tracks the collection of ivory from protected areas, seizures and human-elephant conflicts. The chain of custody, security and management of ivory held by government authorities requires codification and standardisation by applying comprehensive standard operational procedures (SOPs). MINFOF's centralised and decentralised stocks have continued to suffer from reported cases of leakage of both marked and unmarked seized ivory (EIA, 2018b).
- **Poor ivory seizure reporting:** Despite the large number of ivory seizures occurring in Cameroon, the CITES Management Authority is not regularly reporting ivory seizures to ETIS directly or via the CITES Secretariat as required by Resolution Conf. 10.10. In some instances, unmarked ivory obtained through investigations or during the reporting phase has been hidden by unscrupulous law enforcement or judicial police officials to be sold to third parties or even back to the original trafficker (Nkoke et al., 2016). The lack of coordination between relevant agencies to investigate poaching and ivory trafficking events and the absence of a centralised intelligence database impedes effective law enforcement to the benefit of organised crime.

- **Judicial process deficiencies:** There is an overarching need for more effective law enforcement to tackle the illegal ivory trade and better prosecutorial performance in the courts to secure deterrent sentencing of traffickers. In some cases, during court procedures, offence reports are not accompanied by the confiscated ivory, and there is no accountability for the whereabouts of the evidence in question (Nkoke et al., 2016). In other instances, ivory that has been officially documented as received by the courthouses as evidence suddenly disappears either before or after judgement (Nkoke et al., 2016).

The TRAFFIC Central Africa Programme Office (CAF), through the project "Supporting the implementation of Cameroon's (CITES) National Ivory Action Plan and reducing the supply of ivory from Cameroon's TRIDOM region, through effective stockpile management", which is funded by the U.S. Fish and Wildlife Service (USFWS) and endorsed by MINFOF, is continuing to help develop a NISMS with associated SOPs. This effort respects the framework provided in the Government of Cameroon's Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014. This regulation outlines the rules and procedures for the marking and management of ivory stocks and supports the implementation of CITES Resolution Conf. 10.10. MINFOF has demonstrated an acute willingness to utilise tools developed by TRAFFIC and other organisations that are geared towards facilitating proper stockpile management and reporting at all levels.

## confiscated, unmarked ivory

is sometimes sold to third parties or back to the original trafficker by corrupt officials



*Ivory tusks under extreme security in South Africa*

### 3: ASSESSING EXISTING FRAMEWORKS AND SYSTEMS OF IVORY STOCKPILE MANAGEMENT

This section reviews the most important documents and resources available for considering the development of an ivory stock management system. To the extent possible, all CITES prescriptions and the best practice attributes of other existing management protocols all need to be incorporated into

Cameroon's NISMS and SOPs to ensure high standards which tick all of the relevant boxes in terms of crafting a robust and secure system to safeguard the country's ivory stocks. In this regard, key documents and publications are assessed to inform this important undertaking.

### 3.1 THE MANAGEMENT OF IVORY STOCKS UNDER CITES

As a valuable product historically and a current illegal trade commodity of international focus, various countries worldwide now possess elephant ivory stocks which are expected to be managed effectively without leakage into illegal trade channels. Whilst many nations have developed management systems to meet national objectives, CITES has taken the lead in defining international standards that need to be incorporated into all systems. Pursuant to the Convention, the overarching ivory stockpile management framework emanates from Resolution Conf. 10.10 and associated decisions and notifications that periodically arise through deliberations at CITES meetings.

It needs to be appreciated that the decision-making meetings of the Conference of the Parties are generally held every three years, which necessarily results in the adoption of amendments to existing Resolutions and agreement on new Decisions on a range of issues, including elephants, ivory trade, and stockpile management. Further, in the

interim period between CoPs, meetings of the Standing Committee can also result in decisions that relate to stockpile management and ivory trade matters, especially the annual review of NIAPs. Thus, in recognition of the dynamic iterative nature of the Convention's workings, national mechanisms for the management of ivory stockpiles need to be designed to respond and adapt to support CITES requirements that might change over time. Table 2 outlines and describes the CITES Resolutions, Decisions and Notifications to the Parties which are currently relevant for these purposes following the deliberations at CoP19 in November 2022. The relevance of these Resolutions and Decisions to the development of NISMS is also given, using a 'High', 'Medium' and 'Low' ranking. As a longstanding CITES Party of some 42 years, Cameroon is obligated to incorporate CITES requirements for ivory stockpiles into its national management system.

TABLE 2

CITES Resolutions, Decisions and Notifications to the Parties currently in effect following the 19th meeting of the Conference of the Parties that relate to elephants and ivory trade issues.

| NUMBER / TITLE  | BRIEF DESCRIPTION / LINK TO CITES WEBSITE / RELEVANCE TO NISMS (HIGH, MEDIUM, OR LOW)  |
|---|--|
| <b>CITES RESOLUTIONS</b>  |  |
| Resolution Conf. 10.10 (Rev. CoP19)<br><i>Trade in elephant specimens</i>           | The preminent CITES Resolution for elephants presents definitions, prescribes a marking system, reporting requirements and various other directives concerning trade, quotas, traceability, and monitoring. The three Appendices establish the two monitoring systems, MIKE and ETIS, and the NIAP oversight process.<br><a href="https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf">https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf</a><br><b>Relevance: High</b> |
| Resolution Conf. 16.9 <i>African Elephant Action Plan and African Elephant Fund</i> | This Resolution establishes a conservation plan for African Elephants and a funding mechanism under the auspices of UNEP, which potentially could be tapped for establishing and implementing ivory stock management systems.<br><a href="https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-16-09.pdf">https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-16-09.pdf</a><br><b>Relevance: Medium</b>   |
| <b>CITES DECISIONS</b>  |  |
| Decision 17.170 (Rev. CoP19)<br>Stocks and stockpiles                               | Directed to the Standing Committee, with the assistance of the Secretariat, this decision calls for a review of existing provisions concerning controls on stocks of specimens of CITES- listed species, including their objectives, implementation, and resource implications and shall report its conclusions and recommendations at the 20th meeting of the Conference of the Parties.<br><a href="https://cites.org/eng/dec/index.php/44447">https://cites.org/eng/dec/index.php/44447</a><br><b>Relevance: High</b>                     |

|   |   |
|---|---|
| <p>Decisions 18.184 (Rev. CoP19); 18.185 (Rev. CoP19); 19.156; 19.157<br/>Stocks and stockpiles (elephant ivory)</p>          | <p>These decisions direct the Secretariat to identify Parties that are not annually reporting the status of their ivory stockpiles or where stockpiles are not adequately secured, and to request Parties to submit information on stockpile management tools, techniques and technologies relevant to the "Practical guidance on ivory stockpile management". The Standing Committee is charged with determining if further interventions against Parties not reporting stockpile information are required. Parties are directed to comply with requirements for annual reporting on stockpile inventories to the Secretariat and to ensure that adequate funding, capacity building and training are available to ensure ivory stockpiles are inventoried, secured, and when appropriate, disposed of properly.<br/><a href="https://cites.org/eng/dec/index.php/44353">https://cites.org/eng/dec/index.php/44353</a></p> <p><b>Relevance: High</b></p> |
| <p>Decisions 19.68; 19.69; 19.70<br/>Review of National Ivory Action Plans Process</p>  | <p>These decisions direct the Secretariat to engage a consultant to conduct a review of the National Ivory Action Plan Process and associated Guidelines, to consider ways to facilitate timely reporting and the relationship between the NIAP process and other Article XIII processes, to review the different reporting requirements and advise how the NIAP process could be strengthened. The Standing Committee reviews the report and prepares recommendations for updating the NIAP Process at the next CITES CoP.<br/><a href="https://cites.org/eng/dec/index.php/44287">https://cites.org/eng/dec/index.php/44287</a></p> <p><b>Relevance: High</b></p>   |
| <p>Decisions 19.99; 19.100; 19.101<br/>Ivory seizures and domestic ivory markets</p>  | <p>These decisions direct the Secretariat to advise whether an analysis of ivory seizures connected to each Party with a legal domestic market is possible and, if so, have such analysis included in the ETIS reports to the Standing Committee and CoP20. The Standing Committee will agree appropriate measures in this regard.<br/><a href="https://cites.org/eng/dec/index.php/44306">https://cites.org/eng/dec/index.php/44306</a></p> <p><b>Relevance: High</b></p>  |
| <p>Decisions 18.117 (Rev. CoP19); 18.118; 18.119 (Rev. CoP19)<br/>Closure of domestic ivory markets</p>                       | <p>These decisions direct Parties "that have not closed their domestic markets for commercial trade in raw and worked ivory" to report to the Secretariat on what measures they are taking to ensure that their domestic ivory markets are not contributing to poaching or illegal trade. The Secretariat will compile a report to the Standing Committee for consideration and any subsequent recommendations, as appropriate and consistent with the scope and mandate of the Convention, to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44378">https://cites.org/eng/dec/index.php/44378</a></p> <p><b>Relevance: Medium</b></p>   |
| <p>Decisions 19.275; 19.276; 19.277<br/>Taxonomy and nomenclature of African Elephants <i>Loxodonta</i> spp.</p>              | <p>These decisions direct the Secretariat to seek the perspectives of Parties and other stakeholders on the potential effects of recognising the African Forest Elephant <i>Loxodonta cyclotis</i> as a separate species to African Savannah Elephant <i>Loxodonta africana</i> for CITES purposes; to develop a list of all CITES Resolutions and Decisions that would be impacted by such a change and prepare a review on impacts and findings to the Standing Committee for its consideration. The decision directs the Animals Committee to consult the IUCN African Elephant Specialist Group, review the taxonomic-nomenclature and make recommendations on this issue. The Standing Committee shall review these deliberations and provide recommendations to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44323">https://cites.org/eng/dec/index.php/44323</a></p> <p><b>Relevance: High</b></p>                                      |
| <p>Decisions 19.167; 19.168<br/>Trade in live African Elephants <i>Loxodonta africana</i></p>                                 | <p>These decisions direct the Standing Committee to mandate a CITES dialogue meeting as per Resolution Conf. 14.5 on <i>Dialogue meetings for African Elephant range States</i> to deliberate on trade in live African Elephants and propose recommendations to CoP20, including any appropriate changes to current annotations on this matter. Parties are requested to limit any exports of live wild-caught African Elephants until the Dialogue meeting has transpired, although specified exceptions to this are noted.<br/><a href="https://cites.org/eng/dec/index.php/44459">https://cites.org/eng/dec/index.php/44459</a></p> <p><b>Relevance: Low</b></p>   |
| <p>Decisions 19.94; 19.95; 19.96<br/>Implementation of the priority recommendations from the review of the ETIS programme</p> | <p>The Secretariat is directed to work with TRAFFIC, in consultation with the MIKE and ETIS Technical Advisory Group (TAG), to implement the high and medium priority recommendations in Annex 3 to document CoP19 Doc. 21 and report on progress to the Standing Committee, who is then charged with review and making recommendations to CoP20 if appropriate.<br/><a href="https://cites.org/eng/dec/index.php/44308">https://cites.org/eng/dec/index.php/44308</a></p> <p><b>Relevance: Medium</b></p>  |

|  |  |
|--|--|
| <p>Decisions 19.97; 19.98<br/>ETIS categorisation of Parties</p>   | <p>The decision directs the Secretariat, in consultation with the MIKE-ETIS Technical Advisory Group and TRAFFIC, to develop draft criteria for the categorisation of Parties based on the ETIS analysis and seizure data relating to elephant specimens submitted to TRAFFIC and submit draft criteria to the 78th meeting of the Standing Committee for consideration. The Standing Committee shall review this work and recommend the adoption of criteria for categorising Parties to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44302">https://cites.org/eng/dec/index.php/44302</a></p> <p><b>Relevance: Medium</b></p>   |
| <p>Decisions 19.35; 19.36; 19.37<br/>Financial and operational sustainability of the MIKE and ETIS programmes</p>                                  | <p>These decisions direct the Secretariat to prepare funding proposals to support the MIKE programme and explore alternative sources, such as private sector and crowdfunding options, to continue to improve the MIKE Online Database and online training operations, and to provide the Standing Committee with a report on the activities it has undertaken. Parties, governmental, intergovernmental, non-governmental organisations, donors and other entities are encouraged to support elephant range States and the MIKE and ETIS programmes. The Standing Committee is directed to review the report by the Secretariat and make recommendations to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44319">https://cites.org/eng/dec/index.php/44319</a></p> <p><b>Relevance: Medium</b></p>  |
| <p>Decisions 19.102; 19.103<br/>Trade in mammoth ivory</p>   | <p>The Secretariat is directed to compile information relating to the potential contribution of mammoth ivory trade to illegal trade in elephant ivory and elephant poaching and report its findings to the Standing Committee. The Standing Committee is charged with reviewing the report and making recommendations to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44366">https://cites.org/eng/dec/index.php/44366</a></p> <p><b>Relevance: Low</b></p>  |
| <p>Decisions 18.226 (Rev. CoP19); 19.107; 19.108<br/>Trade in Asian Elephants (<i>Elephas maximus</i>)</p>   | <p>These decisions direct those Parties involved in the trade in Asian elephants and their parts and derivatives to undertake investigations into the trafficking and illegal commerce and to improve and enforce national laws to prevent illegal trade. These decisions also call for the development of strategies to manage captive Asian elephant populations, including ensuring that all trade and cross-border movements complies with CITES for Asian elephants of wild origin and to establish a regional system for registering, marking, and tracing live Asian elephants. The Secretariat directed to request reports from those affected Parties on their implementation efforts and to develop requirements for a registering, marking, and tracing system for live Asian elephants for presentation to Asian elephant range States with the aim of establishing either a global system or standardised national systems. A report in this regard will be sent to the Standing Committee for review and recommendations to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44364">https://cites.org/eng/dec/index.php/44364</a></p> <p><b>Relevance: Medium</b></p>   |
| <p>18.90 (Rev. CoP19); 18.91 (Rev. CoP19); 19.84; 19.85; 19.86; 19.87; 19.88<br/>Wildlife crime enforcement support in West and Central Africa</p> | <p>These decisions direct those Parties importing CITES specimens from West and Central Africa to reinforce efforts addressing wildlife crime and supporting legal trade at sustainable levels, including the facilitation of robust non-detriment findings, conducting due diligence as outlined in Resolution Conf. 11.3 (Rev. CoP19) on <i>Compliance and enforcement</i> and closely scrutinising accompanying documents to ensure that illegal species are not laundered into legal trade; any concerns that arise should be communicated to the exporting State, or with the Animals or Plants Committees, the Standing Committee or the Secretariat. The conservation community is encouraged to provide financial and technical assistance to Parties in West and Central Africa in this regard. Parties in West and Central Africa and Parties importing CITES specimens from this region should enhance collaboration and communication, including the use of INTERPOL, World Customs Organization (WCO) and the Enforcement Focal Points designated by National CITES Authorities for communicating sensitive information and utilising international law enforcement mechanisms established by the United Nations Convention against Transnational Organised Crime (UNTOC). Seizures of timber from West and Central Africa should be reported to exporting countries as soon as practical, along with implementation of the measures and activities outlined in the Outcome document of the Task Force on illegal trade in specimens of CITES-listed tree species. Parties in West and Central Africa are requested to engage in a wide range of regional and bilateral activities, including the identification of activities to the International Consortium on Combatting Wildlife Crime (ICWC), donors and other regional development and law enforcement institutions, seeking support and funding for implementation. The Standing Committee is directed to establish a working group promoting enhanced collaboration between source, transit, and consumer countries, to consider a future funding mechanism for addressing West and Central African issues, and to make appropriate recommendations in this regard to CoP20.<br/><a href="https://cites.org/eng/dec/index.php/44304">https://cites.org/eng/dec/index.php/44304</a></p> <p><b>Relevance: Medium</b></p> |

## CITES NOTIFICATIONS TO THE PARTIES

|  |   |
|--|---|
| <p>2023/023<br/>of 03 March 2023</p>   | <p>Supports the implementation of ETIS by explaining the data collection process, including the requirements and deadlines for reporting all ivory seizure data via the ETIS Online system or manually through the CITES Secretariat or directly to TRAFFIC. This link also includes the "Explanatory Notes for the Elephant Trade Information System (ETIS) Data Collection Form": <a href="#">Monitoring the illegal trade in ivory and other elephant specimens</a>.</p> <p>Provides the data collection form for manual submission of individual seizure cases: <a href="#">Annex 1: Elephant Trade Information System (ETIS) Data Collection Form</a>.</p> <p>Provides the data collection form for submission of multiple seizure cases in an Excel spreadsheet format: <a href="#">Annex 2: Collection form</a>.</p> <p><b>Relevance: High</b></p> |
| <p>2023/004<br/>of 10 January 2023</p>   | <p>Supports ivory stock management with explanatory information on CITES requirements for marking, inventories, and security of elephant tusks, as well as a recommended data form for annual reporting on the status of national ivory stockpiles to the CITES Secretariat: <a href="#">Elephant ivory stocks: marking, inventories and security</a>.</p> <p><b>Relevance: High</b></p>  |
| <p>Various other Notifications to the Parties (NttP) on the ivory trade and related issues are issued periodically. Some are posted by the CITES Secretariat to communicate trade suspensions that were agreed by the Standing Committee. For example, see NttP 2022/030 of 12 May 2022 that concerned the suspension of live elephant exports from Lao People's Democratic Republic (<a href="https://cites.org/sites/default/files/notifications/E-Notif-2022-030_0.pdf">https://cites.org/sites/default/files/notifications/E-Notif-2022-030_0.pdf</a>).</p> <p>Other Notifications are posted at the request of individual countries who wish to communicate national ivory trade policy changes to the wider CITES community, for example NttP 2020/074 of 11 December 2020 from Israel (<a href="https://cites.org/sites/default/files/notifications/E-Notif-2020-074.pdf">https://cites.org/sites/default/files/notifications/E-Notif-2020-074.pdf</a>), NttP 2020/044 of 26 May 2020 from China (<a href="https://cites.org/sites/default/files/notif/E-Notif-2020-044.pdf">https://cites.org/sites/default/files/notif/E-Notif-2020-044.pdf</a>) or NttP 2018/061 from Japan (<a href="https://cites.org/sites/default/files/notif/E-Notif-2018-061.pdf">https://cites.org/sites/default/files/notif/E-Notif-2018-061.pdf</a>). Such information is useful for informing other Parties of policy developments so that their own national policies on related issues can be responsive</p> <p><b>Relevance: Medium</b></p> |   |

These documents collectively show that CITES continually accords the elephant ivory trade in general, and ivory stockpile management in particular, as important reoccurring agenda topics at every meeting of the Standing Committee and the CoP. The arsenal of directives which emanate from this documentation cannot be ignored, especially in the context of the NIAP oversight process that has been operative over the last decade. Whilst all CITES provisions that relate to elephant conservation and trade are worth examination, those that address stockpile management issues hold the greatest relevance to the present initiative and need to be considered in detail, particularly Resolution Conf. 10.10 (Rev. CoP 19) on *Trade in elephant specimens*, Notification 2023/004 (of 10 January 2023) on marking, inventories, and security of elephant ivory stocks, and Notification 2023/023 of 03 March 2023 on the submission of ivory seizure data to ETIS.

### **Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens**

This seminal Resolution for elephant conservation, which has been updated and amended numerous times at successive CITES CoPs (most recently at CoP19), covers a wide range of issues, including:

- agreement on **basic definitions** of the terms "raw ivory and worked ivory" (see paragraphs 1 a & b under *Regarding definitions*);
- the **marking of ivory specimens** (see paragraph 2 under *Regarding marking*);
- requirements for **trade in elephant specimens** and domestic ivory markets (see paragraphs 3 – 20 under *Regarding trade in elephant specimens* and *Regarding trade in raw ivory for commercial purposes*);

- directives on **hunting trophies** (see paragraph 21 under *Regarding quotas for trade in raw ivory as part of elephant hunting trophies*);
- enhancing **traceability** of elephant ivory (see paragraphs 22 – 26 under *Regarding the traceability of elephant specimens in trade*);
- authorising the two elephant **monitoring systems**, MIKE and ETIS, under CITES (see paragraph 27 under *Regarding monitoring the illegal killing of elephants and trade in elephant specimens*);
- enhancing **elephant conservation** in general (see paragraphs 28 – 30 under *Regarding improving elephant conservation and management in range States*); and
- ensuring **adequate resources for implementation** (see paragraphs 31 – 32 under *Regarding resources required for implementing this Resolution*).

In addition, Resolution Conf. 10.10 has three Annexes, which are an integral part of the resolution containing important information and directives to the CITES Parties:

- Annex 1 is titled *Monitoring illegal trade in ivory and other elephant specimens* and establishes the **mandate for ETIS** under the direction of TRAFFIC, with seven subsections addressing introduction, data scope, data governance, data collection and compilation, information, data analysis and interpretation, intersessional remedial action, and funding.
- Annex 2 is titled *Monitoring the illegal killing in elephant range States* and establishes the **mandate for MIKE** under the direction of the Secretariat, with four subsections addressing introduction, scope and methodology, roles and responsibilities, and funding and operational support.
- Annex 3 is titled *Guidelines to the National Ivory Action Plans Process* and establishes **the five-step NIAP process** that addresses the identification of countries for participation in the oversight mechanism, the development of national NIAPs, assessment of the adequacy of NIAPs, monitoring of implementation, and

completion of a NIAP and exist from the process.

Whilst Annexes 1 and 2 establishing the two monitoring systems that have been part of the Resolution since its initial adoption at CoP10 in 1997, Annex 3 was added at CoP17 in 2016, three years after the NIAP process had commenced at CoP16 in 2013. This was done to ensure that the oversight mechanism benefitted from a credible and transparent structure that was clear to all CITES Parties, including the roles and responsibilities of ETIS, the CITES Secretariat and the Standing Committee.

In terms of the current content of Resolution Conf. 10.10 (Rev. CoP19), with respect to ivory stockpile management, the most important requirements to incorporate in national stockpile management systems include the following:

- **Regarding the definition of ivory** (with reference to paragraphs 1 a and b), the Resolution recommends:
  - the term 'raw ivory' shall include all whole elephant tusks, polished or unpolished and in any form whatsoever, and all elephant ivory in cut pieces, polished or unpolished and howsoever changed from its original form, except for 'worked ivory'; and*
  - the term 'worked ivory' shall be interpreted to mean ivory that has been carved, shaped, or processed, either fully or partially, but shall not include whole tusks in any form, except where the whole surface has been carved.*
- **Re the marking of ivory stocks** (with reference to paragraph 2), the Resolution 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 utilising punch-dies, indelible ink or other forms 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 recognised 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. In the case of whole tusks, this number should be placed at the 'lip mark' and highlighted with a flash of colour.

- **Re the mandate for ivory stock management** (with reference to paragraphs 7a - e), the Resolution urges: those Parties in whose jurisdiction there is an ivory carving industry, a legal domestic trade in ivory, an unregulated market for or illegal trade in ivory, or where ivory stockpiles exist, and Parties designated as ivory importing countries, to ensure that they have put in place comprehensive internal legislative, regulatory, enforcement, and other measures to:
  - a. regulate the domestic trade in raw and worked ivory;
  - b. register or license all importers, exporters, manufacturers, wholesalers and retailers dealing in raw or worked ivory;
  - c. introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the movement of ivory within the State, particularly employing:
    - i. compulsory trade controls over raw ivory; and
    - ii. comprehensive and demonstrably effective stock inventory, reporting, and enforcement systems for worked ivory;
  - d. engage in public awareness campaigns, including supply and demand reduction; drawing attention to existing or new

regulations concerning the sale and purchase of ivory; providing information on elephant conservation challenges, including the impact of illegal killing and illegal trade on elephant populations; and, particularly in retail outlets, informing tourists and other non-nationals that the export of ivory requires a permit and that the import of ivory into their state of residence may require a permit and might not be permitted; and

- e. maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and inform the Secretariat of the level of this stock each year before 28 February, *inter alia* to be made available to the programme Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses, 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.

- **Re issues of security** (with reference to paragraph 11), the Resolution directs the Secretariat:
 

to provide technical assistance to Parties to

  - a. improve legislative, regulatory and enforcement measures concerning trade in ivory and in developing practical measures to implement this Resolution;
  - b. support, where requested, the security and registration of government-held ivory stockpiles, and provide practical guidance for the management of these stockpiles; and
  - c. identify specimens of elephant ivory, other types of ivory and ivory look-alike materials.

### 3.2 NATIONAL IVORY STOCKPILE MANAGEMENT FRAMEWORK IN CAMEROON

In Cameroon, MINFOF is charged with the management of seized wildlife products. Article 145, Paragraph 1 of Law No. 94/01 of 20 January 1994 to promulgate Forestry,

Wildlife and Fisheries Regulations (the 1994 Wildlife Law) provides that "the detention of seized equipment and non-perishable products is entrusted to the competent technical

administration, or failing that, to the nearest pound". It should be understood that 'non-perishable products' include elephant ivory, that 'competent technical administration' gives reference to MINFOF's national authority over wildlife products, and that 'nearest impoundment structure' refers to other specialised state storage structures such as those for arms and ammunition.

The national regulatory framework governing ivory stockpile management in Cameroon is Decision N° 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014 (otherwise known as Decision 0003/2014) which establishes the rules and procedures for marking, labelling, registration and storage of government-held ivory stocks (see Appendix 2 of this report for a translated English version of this Decision). Decision 0003/2014 is comprehensive and generally compatible with CITES Resolution Conf. 10.10 (Rev. CoP16), with the following requirements:

- Article 1 of Decision 0003/2014 defines four sources of ivory, whereby the specimens derive from: seizures made during anti-poaching operations; from administrative culling or hunting exercises; from found carcasses of elephants that died of natural causes: or from court cases.
- Article 2 categorises five types of ivory, including 'raw' and 'worked' as defined in paragraphs 1 a & b of Resolution Conf. 10.10 (Rev. CoP 19), however, also notes three other types of ivory: 'semi-worked', 'fresh' and 'old'.
- Article 4 concerns the marking of all whole ivory tusks of any size and all cut pieces of ivory in line with the size dimensions prescribed in paragraph 2 of Resolution Conf. 10.10 (Rev. CoP 19). This article also specifies additional information requirements of the country's marking system. The CITES marking system calls for the country in possession of the ivory to be identified with the two-letter ISO code, the year in question to be rendered by its last two digits, a discreet serial number, and the weight of the specimen in kilograms. For example, **CM/00/127/14**, following the CITES prescription, represents the 127th elephant tusk

acquired in the year 2000, which weighed 14 kg. According to Decision 0003/2014 in Cameroon, however, that same tusk would be marked: **CMR XX 00/13-X/CA/OR/14**, whereby: CMR designates Cameroon using the three-letter ISO code; XX represents the two-digit administrative region acronym; 00 is the serial number of the marking; 13 is the two last digits of the year in question (e.g. 2013); X is the serial number of the year; CA corresponds to one of the five ivory types in Article 2; OR corresponds to one of the four ivory sources in Article 1; and 14 represents the weight of the specimen in kilograms (e.g. 14 kg).

- Article 5 of Decision 0003/2014 further expands the details captured by the Article 4 marking requirements for the purposes of labelling, including the provision of the actual locality of the seizure (not just the region in which it occurred), the precise seizure date, the person in charge of carrying out the seizure, the supervisor of the operation, the measurements (length and weight) of the apprehended ivory, and any other noteworthy observations.
- Article 6 of Decision 0003/2014 provides for the systematic completion of an ETIS data collection form that needs to be transmitted to the Minister in charge of wildlife within 90 days of the seizure. The provision of the ETIS form needs to be done separately from the transmission of the actual seized ivory products.
- Article 7 calls for registration of all ivory specimens in registers kept by a designated official in each of the services concerned, including the Directorate of Wildlife and Protected Areas, the National Brigade for Forestry Control and Anti-poaching / Anti-Poaching Unit, the Regional Delegation, the Departmental or Divisional Delegation, and the storage room assigned for this purpose. For the registration of the seizure, the following information is required: Number order; Date of seizure; Department responsible for data entry; Name of the agent responsible for the seizure; Marking formula; Weight of the ivory; Length of the ivory; Category of ivory specifying: whole, heap, worked, etc.; Reference report/

minutes; Cause of mortality (natural, poaching, administrative beating, self-defence, unknown); Contextual source (seizure, confiscation/restitution, found, recovered in the field, unknown); and Names of the offender.

- Articles 8, 9 and 10 of Decision 0003/2014 concern the storage of ivory, including the designation of competent authorities responsible for storage facilities, the establishment of minimum-security requirements, and the promulgation of regulatory provisions governing the movement of the ivory. Ivory stocks that are still part of pending court cases are only eligible to be sent to central services once judicial deliberations have concluded in the competent courts. All ivory taken out of a government storage facility for any reason must be catalogued in a register that exclusively tracks the exit (and entry) of all stocks, including appropriate notations concerning the dates, reasons, and individuals associated with the delivery or exit of any ivory stocks. Further regulatory detail on this topic will be addressed in Section 5 that covers SOPs.

- Article 11 of Decision 0003/2014 requires a quarterly updated statement on the status of ivory stocks to be sent to the Minister in charge of wildlife. It also mandates that a database be set up to record and track information relating to each ivory specimen in the stockpile and, to monitor compliance, provides for the ivory stocks to be subjected to periodic internal or external controls and audits as necessary. Although these national provisions underpin some internal stockpile reporting requirements, Decision 0003/2014 does not ostensibly require annual reporting on the status of the country's ivory stockpiles to CITES as spelled out in Resolution Conf. 10.10 (Rev. CoP19).
- Article 12 of Decision 0003/2014 addresses the disappearance of ivory specimens from a storage facility, stating that anyone involved in misconduct will face legal prosecution and disciplinary sanctions provided for in the implementing regulations in force.

### 3.3 ENSURING EFFECTIVE STOCKPILE MANAGEMENT: A GUIDANCE DOCUMENT BY TOM MILLIKEN AND JAMES COMPTON

TRAFFIC has long been concerned with the issue of ivory stockpile management, which led to a comprehensive guidance document being issued as an information document at CoP18 in August 2019. At the meeting, the Secretariat deemed TRAFFIC's contribution to be an important resource for the Parties to consult on this topic and, subsequently, at the 74th meeting of the Standing Committee in March 2022, the guidance document was approved in a package of resource materials submitted by the Secretariat for inclusion on the CITES website. As a generic operational guide that outlines a series of protocols and procedures required for realising 'best practice' standards for ivory stock management systems, TRAFFIC's extensive experience in carrying out ivory stockpile inventories and audits informed the development of this document. It is now readily available as an open-access document on the CITES website accessed by, from the home page, clicking on 'Topics', then

'Elephants', then 'Tools and Resources' to reach the portal labelled '*Practical guidance for the management of ivory stockpiles, including their disposal*', or by using this link: [https://cites.org/sites/default/files/eng/prog/elephant/Stock\\_management\\_guidance.pdf](https://cites.org/sites/default/files/eng/prog/elephant/Stock_management_guidance.pdf).

According to the guidance document, the development and implementation of robust and effective stockpile management systems should never be an optional consideration in elephant range States such as Cameroon where, from time to time, ivory tusks will come into the possession of government authorities for any number of reasons. Stockpile management systems are essential for:

- Reducing the risk of corruption and contraband leakage of stocks back into illegal trade;*
- Safeguarding the evidentiary basis of wildlife trade crime to support*

**in elephant range states**  
a robust NISMS should never be optional

investigations, forensic examination, and successful prosecutions;

- *Fostering a culture of custodial accountability and transparency within government; and*
- *Efficiently delivering on an increasing list of annual international and national reporting requirements on the status of stockpile commodities (Milliken & Compton, 2019).*

The guidance document further points out that successful stockpile management systems can also serve to produce pertinent information useful for other wildlife management and law enforcement purposes, including the provision of an accountable platform for forensic examination that safeguards a known chain of custody, the identification of poaching and trafficking ‘hotspots’, or the generation of important demographic data on population structure, trophy sizes and other species-specific considerations.

The CITES-endorsed guidance document produced by TRAFFIC is of practical importance for the development of a NISMS as it addresses many of the components and attributes to be considered in any management system, including:

- **Defining the meaning of stockpile management** as an institutionalised government process that unfolds as a uniform, integrated, holistic system at the national level regardless of the ‘who’, ‘where’, ‘when’, or ‘how’ particular stocks come into government custody.
- **Establishing the basic components of a stockpile management system** as comprising an overarching legal mandate supported by legislation and implementing regulations, the identification of all institutional roles and individual responsibilities, the application of comprehensive SOPs to guide the operational roll-out of the system at every level to guide inter-agency collaboration, Standardise routine functions and tasks, underpin data collection and management and ensure security at storage facilities.
- **Identifying issues which compromise ivory stockpile management** as ineffective political will to make the system work,

lack of clarity regarding responsibility for stockpiles across the chains of custody, poor inter-governmental communication, insufficient capacity building and training for stockpile management, lack of centralised control over the management of primary data, and failure to standardise the tracking of stockpile movements.

- **Characterising the issue of stock consolidation** as a management, financial, and geographical consideration where on-the-ground circumstances support consolidation into a single storage facility managed by a designated institutional authority.
- **Characterising the destruction of stocks** to avoid often burdensome costs, risks and responsibilities associated with securing stockpiles of such value, whilst advocating for ‘best practice’ destruction to entail an independent audit of the stocks in question and ensuring that CITES guidelines for disposal in Resolution Conf. 17.8 on *Disposal of illegally traded and confiscated specimens of CITES-listed species* are followed.
- **Characterising continued theft and leakage from government stockpiles** as a failure of stockpile management, which negatively shapes a country’s reputation internationally, especially when leakage back into illegal trade becomes documented.
- **Describing the costs related to stockpile management** as a core budgetary need that is integrated into the operational frameworks of all lead and supporting institutions.

The guidance document by TRAFFIC also provides a series of Annexes on stockpile management which include:

- **Annex 1** A Checklist to Assess the Status of Stockpile Management at the National Level;
- **Annex 2** CITES Reporting Requirements on Stocks of Selected Species;
- **Annex 3** How to Conduct a Stock Inventory;
- **Annex 4** Stockpile Security and Storage; and
- **Annex 5** How to Conduct a Stock Audit.

All of the components of this document, including the Annexes (Appendix 5 of this report), are useful for developing a robust NISMS and SOPs. For this report, Annex 1 is used to assess the status of stockpile management in Cameroon. The other Annexes used are 3, 4, and 5, corresponding to III, IV,

and V under Annex 5, respectively on How to Conduct a Stock Inventory, Stockpile Security and Storage and How to Conduct a Stock Audit. The guidance document recommendations require the thoughtful attention of the Cameroon Government and other stakeholders.

### **3.4 ELEPHANT IVORY STOCKS IN THE DEMOCRATIC REPUBLIC OF CONGO: WHAT MANAGEMENT SYSTEM SHOULD BE PUT IN PLACE? BY CLEO MASHINI AND SONE NKOKE, 2020**

Through the Wildlife-TRAPS project, TRAFFIC developed a national ivory stockpile management system for DRC, which has since been shared with the Congolese Institute for the Conservation of Nature (ICCN) for adoption and implementation (Mashini & Nkoke, 2020). This document is relevant to Cameroon as the country shares several similarities with the DRC in terms of both being Central African nations subjected to the CITES NIAP process and also facing many of the same challenges, including:

- Dwindling elephant populations as a result of high levels of poaching and IWT;
- Being major sources of illegal ivory trade moving through channels that link West and Central Africa with overseas destinations, especially Asia;
- Experiencing ivory leakage from government-held stockpiles due to a lack of robust stock management systems and other factors such as corruption;
- Having legal gaps in institutional and regulatory frameworks that prevent better performance;
- Marking limited incremental progress in the implementation of country's NIAP;
- Experiencing conflicting or otherwise unclear roles and responsibilities of concerned state institutions;

- Exhibiting weak levels of cooperation and collaboration; and
- Demonstrating low capacity in terms of knowledge and resources.

As such, NISMS development in Cameroon is well served by understanding the commonalities of the DRC experience and striving to undertake a similar methodological approach. The DRC report relied on a comprehensive review of relevant documents, including CITES Decisions, national policies and legal frameworks, and other stockpile management tools developed by TRAFFIC and other stakeholders, as well as undertaking formal and informal interviews with government officials and NGOs. The challenge for both countries is to understand and internalise the rationale and need for strong NISMS with supporting SOPs to address ivory collection, marking, storage, movement, management, security, destruction, and reporting. As both the DRC and Cameroon are already in the spotlight as part of the CITES oversight NIAP process and engaged in the implementation of country-specific action plans, failure to launch fully functioning NISMS produces knock-on effects such as failure to report stockpile information annually to CITES.

### **3.5 DEVELOPMENT OF AN IVORY STOCK MANAGEMENT SYSTEM IN GABON: PROPOSED MINIMUM STANDARDS: RINGUET, S. & LAGROT, J. F. (2013) CITES, GENEVA, SWITZERLAND**

An earlier initiative in neighboring Gabon conducted by TRAFFIC in 2013 also produced an ivory stockpile management system as described in the report *“Development of an Ivory Stockpile Management System in Gabon: Proposals for Minimum Standards”*. This

project addressed different sources of ivory in Gabon, involved taking measurements and marking specimens, resulted in a formal registration of all stocks and an assessment of storage and security issues, discussed the need for audits and periodic cross-checks,

and introduced other important concepts and components of ivory stock management. For each of these components, the document presented an overview of the current situation, noted existing challenges and problematic issues, and proposed a series of remedial recommendations for minimum management standards that would markedly improve transparency and robustness of ivory stockpile management in Gabon (Ringuet & Lagrot, 2013; Mashini & Nkoke, 2020).

The Gabon report was based on an audit carried out in March/April 2012 (Ringuet, 2012) and a field mission a year later in March/April 2013 in which TRAFFIC reviewed existing ivory stock management practices in Gabon and made proposals concerning minimum standards to upgrade performance towards realising a national system for managing government stocks of elephant stocks. In this regard, the following was proposed:

- **Marking of ivory:** All elephant tusks need to be systematically marked to secure an individual identity to ensure better traceability and management. To the extent possible, all stocks should be marked immediately after seizures or any other means of government possession. At the very least, all marked tusks should be catalogued manually (if not digitally), with copies of the inventory signed by the competent authorities and individuals who undertook the marking exercise.
- **Formal registration:** The formal recording of all marked tusks and other ivory specimens into a formal registry is arguably the most important part of managing ivory stockpiles. This effort needs to ensure that all data relating to each individual specimen is duly recorded in detail which, importantly, minimises the likelihood of stocks disappearing before being placed in the central storage facility.
- **Centralisation of ivory stocks:** At the earliest opportunity, all ivory stocks, including those from different agencies and services (wildlife, courts, police, customs etc.), should be centralised and secured in a well-designated facility following clearly established procedures and protocols. Exceptions to this

general rule should apply under specific circumstances, for example, when seized ivory stocks represent evidence in legal cases and need to be presented to the courts; such stocks should only be moved to the central storage facility once judicial proceeding have concluded.

- **Storing and securing ivory stocks:** Appropriate storage facilities and security measures should be designed to prevent theft and leakage of ivory specimens, with restricted access allowed to only authorised persons. Whether centralised or decentralised, these storage facilities should meet the minimum requirements.
- **IT management of ivory stocks:** Besides physical management, the attributes of ivory specimens (i.e., origin, quantity, measurements, mass, etc.) need to be captured electronically and be treated as sensitive and well managed data. A stand-alone national ivory stock database should be designed that aligns with how specimens are registered to avoid any confusion. The database system should have the capability of producing automated reports which are required for reporting purposes and the conducting of audits.
- **Audits and cross-checking of information on ivory stocks:** Internal and external audits of the ivory storage facilities should be a regular exercise of the authority charged with managing ivory specimens and carried out periodically on both a planned and unannounced random basis whenever feasible. Audits on stockpile management should be carried out by an independent body chosen by the management body.
- **Legal framework and legislation:** Specific policy instruments, legislative provisions and/or regulatory procedures should be designed to cover the main aspects of ivory stockpile management (i.e., marking, recording, centralisation, storage, and security considerations, etc.), with clear and formal procedures and the roles and responsibilities of various personnel carefully articulated.

### 3.6 IVORY STOCK MANAGEMENT SYSTEM DEVELOPED BY THE ELEPHANT PROTECTION INITIATIVE

In addition to resources developed by TRAFFIC, other organisations have produced mechanisms and protocols for the management and secure storage of national ivory stockpiles. In this regard, the Elephant Protection Initiative Foundation (formerly known as Stop Ivory)<sup>3</sup> has produced an array of useful content on this topic, including:

- **Stockpile Management System (SMS) Briefing Note** by Elephant Protection Initiative Foundation, 2021
- **Best Practices and Gold Standards for the Management of Ivory (and other wildlife products)** by Elephant Protection Initiative Foundation, a PowerPoint presentation, July 2019.
- **Gold Standards for the Management of Ivory & Other Wildlife Products** by Elephant Protection Initiative Foundation, July 2019.
- **Tools to Support the Management and Inventorying of Ivory Stockpiles** by Elephant Protection Initiative Foundation, a PowerPoint presentation, July 2019.
- **Ivory Inventory Protocol for Planning and Conducting Ivory Inventories (Version 1.4)** by Elephant Protection Initiative Foundation in July 2017.

The EPI's Stockpile Management System (SMS) has moved beyond narrative guidance and developed an integrated software application that runs on tablet computers or smart phones to collect and record stock inventory data digitally. The data collection software can be specifically tailored to a country's needs and allows for a photograph of each item to become part of the record. The EPI's SMS directs the inventoried ivory information to a country-specific secure server that hosts centralised data on all stocks across the country that have been registered using the SMS protocol. The server is accessible online using customised passwords and it is possible to restrict data access, for example, a national park warden could be restricted to viewing only those data that relate to a particular protected area. In any event, all stock data remains the confidential property of the respective government department using the system, and the issue of data access is a national level prerogative to be determined by each country (EPIF, 2021).

At the 69th meeting of the Standing Committee in November 2017, the Secretariat was invited to review the SMS and give an opinion on the aspects of this system that would be useful to Parties in fulfilling their reporting obligations under Resolution Conf. 10.10 (Rev. CoP17) and under Decision 17.171 (Mashini & Nkoke, 2020). The Secretariat delivered a favorable opinion and various EPI resources for stockpile management, including a description of the SMS, are available on the CITES website portal dealing with *'Practical guidance for the management of ivory stockpiles, including their disposal'*.

A positive feature of the SMS app is that it provides a quick, user-friendly, stepwise approach to digital data collection, including the addition of photographic components for each record, and then allows for immediate transmission of such data to the centralised database using Wi-Fi or mobile data (EPI, 2021). The data fields can be easily adapted to accommodate a country's particular needs, and it has been reported that experts can train a novice with no computer experience on how to use the application in less than 15 minutes (EPI, 2021). Further, the server consolidates all data allowing for inventory summaries to be produced on demand, or specified subsets of the data, for example, by site, region, or commodity type (EPI, 2021). Finally, individual records can be amended in the event of the movement of ivory from one storage facility to another or in the event of destruction, loss, or some other issue (EPI, 2021).

All the resources reviewed in this section hold relevance to the development of NISMS and SOPs for Cameroon. Cameroon's current ivory stock management practices need to be measured against CITES requirements and the considered analysis of existing frameworks, systems and 'best practice' tools to identify gaps and opportunities for addressing issues of concern. The assessment of questionnaire responses and interviews with government officials has allowed a basic overview of current stockpile management process in Cameroon which should enable the formulation of remedial recommendations to improve the situation.

**Stockpile Management System app** allows quick, digital recording of stock inventory



*Raw ivory tusks seized in the East of Cameroon.*

## 4: ASSESSING THE CURRENT IVORY STOCKPILE MANAGEMENT SITUATION

Effective stockpile management systems are institutionalised government processes that have legally binding, accountable governance structures, clearly defined roles and responsibilities of all relevant institutions and key personnel, and detailed procedural guidance and protocols that support the management of stocks of targeted wildlife commodities at all stages of custody and reliably produce up-to-date records on their status upon demand (Milliken and Compton, 2019).

Sustained and performant stockpile management systems are thus rooted in unambiguous legal mandates with designated authorities fulfilling prescribed, standardised operational functions in a repetitive manner. This section discusses the current situation in Cameroon concerning ivory stockpile management.

## 4.1 THE LEGAL MANDATE IN CAMEROON FOR WILDLIFE PRODUCTS

MINFOF has long been recognised as the central authority for the management of government-held ivory stocks in Cameroon. Law No. 94/01 of 20 January 1994 is the foundational text on forest and wildlife protection and management. Article 11 of this law states: *“The protection of the forest, wildlife, and fisheries resources shall be the responsibility of the State”*, giving MINFOF full authority to manage the country’s extensive forest and wildlife assets through biodiversity conservation and regulatory mechanisms (Nkoke et al., 2016). Several other wildlife regulatory measures buttress Law No. 94/01, including Decree No. 2005/099 of 06 April 2005 and Decree No. 95/466 of 20 July 1995 which underpins the enforcement of wildlife legislation, especially the unambiguous stipulation of Article 68: *Control and surveillance of wildlife activities are carried out by the staff of the administration in charge of wildlife, following the arrangements defined by order by the ministry in charge of wildlife.*

With this authority, MINFOF is clearly the main competent body for implementing wildlife protection regulations, but the Ministry is also assisted by other LEAs such as the Police, the Gendarmerie and Customs, whose competencies are recognised pursuant to Cameroon’s criminal law (Nkoke et al., 2016). The description of these various bodies reveals that their involvement in the enforcement of

wildlife law is undeniable, as provided by Article 141, paragraphs 1 and 2 of Law No. 94/01 of 20 January 1994:

1. *Without prejudice to the prerogatives of the Legal Department and judicial police officers having general jurisdiction, sworn officials of the services in charge of forestry, wildlife, and fisheries shall, on behalf of the State, local councils, communities, or private individuals, investigate, establish, and prosecute offences relating to forestry, wildlife, and fisheries.*
2. *The officials referred to in subsection 1 above shall, at the request of the services concerned and under the conditions laid down by decree, take an oath before the competent court.*

Further, with specific reference to elephants, Order No. 0648/MINFOF of 18 December 2006, which was reviewed and updated as Order No 0053/MINFOF of 01 April 2020, categorises wildlife into classes A, B, and C, according to the degree of protection afforded individual species; both the Forest and Savannah Elephant have been designated as Class A protected species, which corresponds to an Annex I CITES designation in terms of protective status and trade issues. Accordingly, the Ministry is charged with collecting and storing confiscated wildlife products, including elephant ivory.

## MINFOF

is recognised as the central authority for management of Cameroon’s ivory stocks

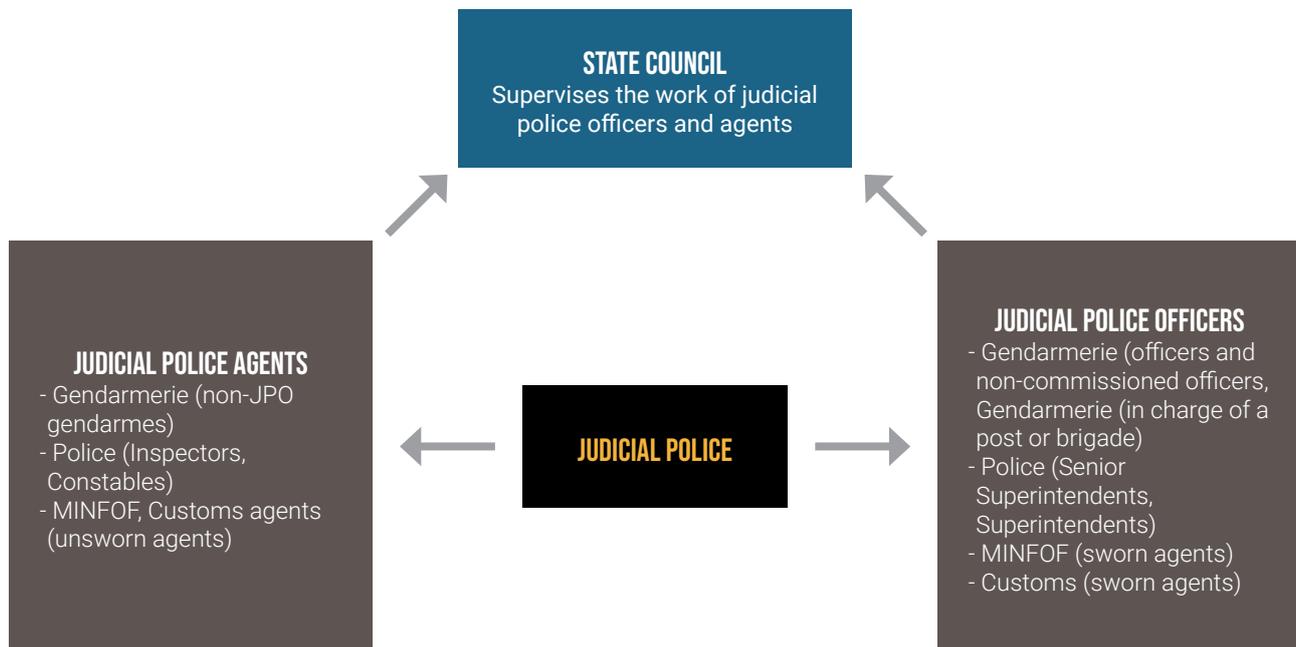
## 4.2 OTHER RELEVANT AUTHORITIES THAT MAY DEAL WITH IVORY STOCKS

The Police and the national Gendarmerie are leading law enforcement agencies in Cameroon. The fundamental mission of the police is to ensure the respect and protection of institutions, people and goods, public freedom, and compliance with the laws of the national territory (Article 3 of Decree No. 2012/540 of 19 November 2012). The national Gendarmerie is a component of the military forces, with a mission focused on executing civil tasks of the Ministry of Territorial

Administration and the Ministry of Justice throughout the country. In addition, it assists the other ministerial departments, performing specific tasks assigned to them under current regulations (Articles 1 and 2 of Decree No. 2001/181 of 25 July 2001). Considering the different sources of ivory in the country, both the Police and the Gendarmerie are likely to come into possession of ivory stocks with some degree of frequency.

FIGURE 1

Types of Judicial Police Officers and Agents.



Source: Nkoke et al., 2016

Indeed, most law enforcement against wildlife trade crime in Cameroon is carried out by Judicial Police Agents (JPA) and Judicial Police Officers (JPO) in accordance with Articles 79 and 80 of Law No. 2005/007 of 27 July 2005, which establishes the country's Criminal Procedure Code (CPC) (Nkoke et al., 2016). The functions of the Judicial Police are exercised under the supervision of the State Counsel or State Prosecutor, which designates JPOs and JPAs as judicial assistants to the State Counsel pursuant to Article 78 of the CPC.

However, JPAs are public servants whose authority is more limited in scope to that accorded JPOs in that they aid in carrying out certain procedural steps of investigations, evidence gathering, offence statements, and custody issues, according to Article 81 of the CPC. On the other hand, JPOs are public servants who possess the broader legal authority to investigate, gather evidence, identify, and charge offenders, co-perpetrators and accomplices, issue offence statements, and prosecute suspects (Figure 1). Article 88 of the CPC provides that JPO perform their duties within the territorial limits defined by the existing regulation.

It should be noted that Cameroon recognises two categories of Judicial Police Officers: "Judicial Police Officers with general competence" (JPOGC) and "Judicial Police Officers with special competence" (JPOSC). JPOGC comprise police and gendarmerie officers with the ability to conduct criminal investigations on complex issues. This category includes officers and non-commissioned officers of the Gendarmerie, including Gendarmes in charge of a brigade or post (even if only in an acting capacity), Superintendents of Police, Deputy Superintendents of Police; Gendarmes and Inspectors of Police who have passed the Judicial Police Officer's examination and taken the oath, and Public Servants who head an external service of National Security (even if they are only temporarily performing such functions).

The JPOGCs are entitled to address criminal offences, gather evidence, seek perpetrators and accomplices, and, where applicable, prosecute them in the absence of wildlife administration agents in the area, as provided for in Article 82 Paragraph A of the CPC. However, JPOGCs need to involve MINFOF,

according to Article 143 Paragraph 1 of Law No. 94/01, which states that:

*Sworn agents from the administrations in charge of forests, wildlife, fisheries, and Merchant Shipping services, and Judicial Police Officers with general competence immediately submit their statements to the supervisors at the administrations in charge of forests, wildlife, and fisheries, as the case may be.*

These officials also play a role in the enforcement of court decisions as regulated by the CPC pursuant to Article 545 Paragraph 3 which states: *“the State Counsel and the parties pursue, each in its sphere, the enforcement of decisions that have become irrevocable”*. Article 81, paragraph 1 of the CPC accords gendarmes who are not JPOs, Police Inspectors or Police Constables with the status of JPAs. They assist JPOs and report any infringement

they become aware of to their supervisors. However, pursuant to Article 81, paragraph 2 of the CPC, JPAs do not have decision-making authority concerning custody issues.

And finally, MINFOF and Customs Agents are accorded JPOSC status to handle issues specifically related to their respective areas of competence, for example, arresting poachers with ivory in a protected area or apprehending ivory smugglers at an airport, respectively. Pursuant to Article 80 of the CPC, such individuals are civil servants with the prerogatives of JPOs recognised by special texts, which clearly define any operational conditions or restrictions that must be followed. Whilst there are varying degrees of competencies during preliminary investigations that qualify the offence, during prosecution and trial, or after judicial rulings, each body is competent to act based on its prerogatives, as recognised by the existing legislation.

### 4.3 LEGAL MANDATES FOR STOCKPILES

The Police, Gendarmerie, and Customs all join MINFOF in being key players enforcing wildlife laws in Cameroon. On occasion, these LEAs will be charged with collecting and securely storing ivory stocks at least on a temporary basis. Two laws in Cameroon mandate the retention of seized products which will necessarily give rise to stockpiles. According to Article 89 Paragraph 3 of the CPC, stocks falling the hands of the Police, Gendarmerie or Customs need to be placed under seal in the prosecution's court offices: *“An inventory of the seized objects is performed, and such objects are placed under seal in the State Counsel's offices; a copy of the seizure statement is given to the holder of such objects”* (Nkoke et al., 2016). With respect to MINFOF's overarching authority for wildlife products, Article 145 paragraph 1 of Law No. 94/01 provides that *“the detention of seized equipment and non-perishable products is entrusted to the competent technical administration, or failing that, to the nearest impoundment structure”*.

These provisions indicate that two authorities are competent to detain seized wildlife products: the prosecutor's offices affiliated with the State Counsel and MINFOF as the

administrator of wildlife, which could lead to some confusion. However, in considering the *specialia generalibus derogant maxim*, which posits that when both general and specific rules apply to a legal issue, the more specific rules prevail, it can be asserted that the authority given to MINFOF for stockpile management in the Law No. 94/01 of 20 January 1994 takes priority. Therefore, the wildlife administration has the overarching competence to detain and manage seized wildlife products.

To this effect, it is important to distinguish between perishable goods, non-perishable products, or equipment that was used to facilitate the offence. Perishable wildlife products fall under the exclusive competence of MINFOF as specified in Article 144 of Law No.94/01 which states:

1. *Perishable products seized, except for those that are dangerous or damaged, shall, in the absence of a purchaser, be sold immediately, by public auction or mutual agreement by the competent service, under the conditions laid down by decree.*
2. *Proceeds of the sale shall be paid into the public treasury within 48 hours.*

### MINFOF and other LEAs

are all key players in enforcing wildlife laws in Cameroon

The detention of non-perishable products, such as trophies and live animals, falls under the competence of MINFOF, according to Article 145, paragraph 1 of Law No. 94/01 which states: “The detention of seized non-perishable and material products is mandated to the competent technical administration, or failing that, to the nearest impound”. Regarding seized equipment, if it was used more than

once for an infringement or in the case of repeat offences, it will be publicly auctioned or privately sold or, in the absence of a bidder and with the exception of weapons, will be handed to the relevant authorities of the territorial administration, according to Article 146, paragraph 4d of Law No. 94/01.

## 4.4 ANALYSIS OF QUESTIONNAIRE RESPONSES FROM LAW ENFORCEMENT PERSONNEL

Police, Gendarmerie, and Customs personnel play legally mandated roles in supporting MINFOF’s paramount authority over wildlife resources by performing law enforcement actions against wildlife trade crime within their respective jurisdictions. To better understand on the ground realities concerning law enforcement for wildlife trade, stockpile management and inter-agency collaboration in Cameroon, a series of structured and semi-structured interviews were conducted between 19 December 2022 and 17 February 2023 with relevant MINFOF and LEA staff.

### 4.4.1 STRUCTURED INTERVIEWS

Structured questionnaires and an interview guide were developed to elicit responses from key resource persons previously identified based on their activities and roles in wildlife law enforcement, including seizures and the management of seized products (see English version of the questionnaire in Appendix 1). The questionnaire was

structured around five main components: general background and individual profile; role in the LE chain, international and national regulatory frameworks (Q1–Q3); existing systems and procedures on the management of elephant specimens (Q4–Q6); capacity, law enforcement action and collaboration (Q7–Q11); and challenges and recommendations for improvement (Q12–Q14). A total of 53 respondents (14 females and 39 males) of the 61 approached completed the questionnaires, 41 manually and 12 digitally by email. The respondents included low-ranking Ecoguards, Senior MINFOF officials, Justice, Customs, Police and Gendarme officials representing a range of different strategic positions in the LE process. The number of years of service of these individuals ranged from three to 24 years. Table 3 gives a breakdown of responses from each institution, with officials from MINFOF, Justice and Customs accounting for two-thirds of the questionnaires received.

TABLE 3

Number and percentage of questionnaire responses per LEA.

| LEA          | RESPONSES | PERCENTAGE |
|--------------|-----------|------------|
| MINFOF       | 15        | 28.3       |
| Justice      | 10        | 18.9       |
| Customs      | 11        | 20.8       |
| Police       | 9         | 17.0       |
| Gendarme     | 8         | 15.1       |
| <b>TOTAL</b> | <b>53</b> | <b>100</b> |

### Concerning roles in the law enforcement chain and international and national regulatory frameworks (Q1 – Q3)

All respondents appeared to understand their various roles in the wildlife law enforcement process (Q1), exhibiting well-rooted core knowledge and competences, including responsibilities for investigations and arrests, court procedures, prosecutions, and

the execution of court decisions. However, this does not necessarily imply that all of them have personally participated in law enforcement actions specific to wildlife crime. Moreover, knowledge about CITES (Q2) was quite poor, 41.5% (Table 4).

**TABLE 4**

*Number and percentage of respondents with knowledge about CITES.*

| LEA          | RESPONSES | KNOWLEDGE ABOUT CITES | PERCENTAGE  |
|--------------|-----------|-----------------------|-------------|
| MINFOF       | 15        | 8                     | 53.3        |
| Justice      | 10        | 4                     | 40.0        |
| Customs      | 11        | 6                     | 54.5        |
| Police       | 9         | 2                     | 22.2        |
| Gendarme     | 8         | 2                     | 25.0        |
| <b>TOTAL</b> | <b>53</b> | <b>22</b>             | <b>41.5</b> |

Overall, nearly eight out of ten respondents had very good knowledge of Cameroon's wildlife legislation and other regulatory frameworks (Q3), including all MINFOF and Justice personnel (Table 5). Law No. 94/01 and Order No 0053/MINFOF of 1 April 2020 of MINFOF on the classification of fauna species in Cameroon were commonly mentioned.

Whilst for MINFOF and Justice officials, having such knowledge is fundamental to their work, the other LE officials had apparently gained such knowledge through attendance at capacity-building workshops. It should also be appreciated that knowing legislation does not necessarily imply effective application.

**TABLE 5**

*Number and percentage of respondents who were knowledgeable about the Cameroon's wildlife legislation and other regulatory frameworks.*

| LEA          | RESPONSES | KNOWLEDGE ABOUT CAMEROON WILDLIFE LEGISLATION | PERCENTAGE  |
|--------------|-----------|---|-------------|
| MINFOF       | 15        | 15  | 100         |
| Justice      | 10        | 10  | 100         |
| Customs      | 11        | 7   | 63.6        |
| Police       | 9         | 4   | 44.4        |
| Gendarme     | 8         | 6   | 75.0        |
| <b>TOTAL</b> | <b>53</b> | <b>42</b>                                     | <b>79.2</b> |

### Concerning existing systems and procedures on the management of elephant specimens (Q4 – Q6)

This set of questions was centred around systems, procedures, or mechanisms for the management of elephant specimens and, to a lesser extent, other wildlife species, whether

live or derivative products. With respect to ETIS (Q4), knowledge of the monitoring system under CITES was very poor, less than one-third overall (Table 6).

**TABLE 6**

*Number and percentage of respondents with knowledge of ETIS.*

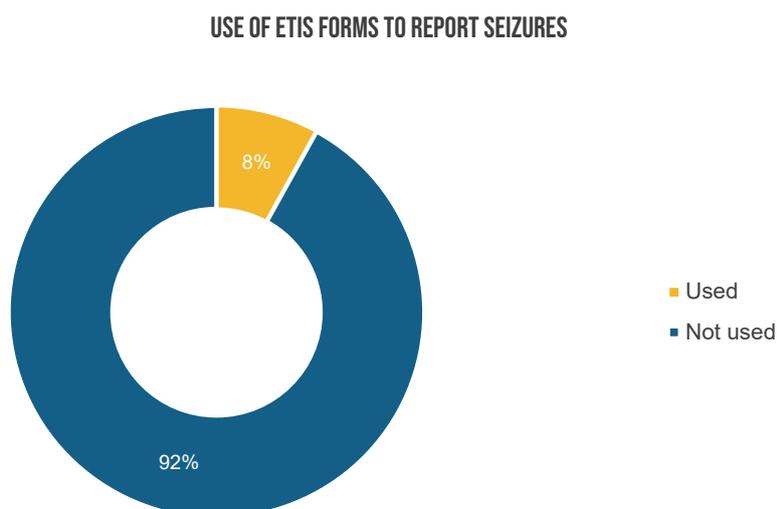
| LEA          | RESPONSES | KNOWLEDGE ABOUT ETIS OF CITES | PERCENTAGE  |
|--------------|-----------|-------------------------------|-------------|
| MINFOF       | 15        | 7                             | 47.0        |
| Justice      | 10        | 2                             | 20.0        |
| Customs      | 11        | 3                             | 27.3        |
| Police       | 9         | 2                             | 22.2        |
| Gendarme     | 8         | 2                             | 25.0        |
| <b>TOTAL</b> | <b>53</b> | <b>16</b>                     | <b>30.2</b> |

Disappointingly, a mere 8% of the respondents, all MINFOF officials, had ever reported an ivory seizure using the ETIS data collection forms (Figure 2). Indeed, out of 15 MINFOF officials,

only seven had some knowledge of ETIS, and just four have used it to report seizure data (and some, in doing so contacted TRAFFIC Central Africa Programme staff for assistance).

**FIGURE 2**

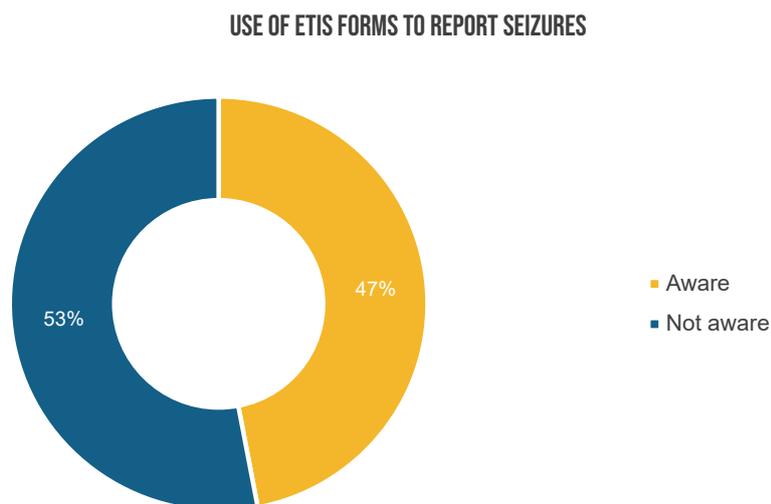
*Percentage of respondents who have actually used an ETIS data collection form to report an ivory seizure.*



The lack of awareness of Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014, which outlines the rules and procedures for the marking and management of ivory stocks (Q5), was also rather poor. Apart from some MINFOF Officials, no other respondent

from the different LEAs knew about this important Decision. And surprisingly, of all the 15 respondents of MINFOF, only eight had knowledge of this Decision and used it following a seizure of elephant ivory (Figure 3).

**FIGURE 3**  
Percentage of awareness of Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014.



In an open-ended response to the question concerning awareness of other legal or administrative measures for managing seized wildlife specimens (live species or products) (Q6), all respondents agreed that MINFOF should manage such products, with MINFOF and JUSTICE officials mentioning Articles 144 and 145 of Law No. 94/01. The other LEAs drew inspiration from their internal processes as JPOGC (Police and Gendarmerie) or JPOSC

(Customs) competencies in managing seized contraband. Specific to wildlife, live animals are to be placed in zoos or wildlife sanctuaries, with Mvog-Betsi Zoo, Mefou Wildlife Sanctuary and Limbe Wildlife Centre specifically mentioned by respondents. For products, it was recognised that specimens should be given to MINFOF following a seizure or upon conclusion of court cases.

**Concerning capacity, law enforcement action and collaboration (Q7 – Q11)**

These questions sought to understand the capacity of respondents in terms of their ability to identify and seize commonly traded contraband wildlife specimens, including ivory, and to capture their experiences in managing seized ivory stocks and collaboration between the different agencies. Nearly three-quarters said they can identify wild animal species and products such as elephant ivory, pangolin scales and feline skins, amongst others (Q7)

(Table 7). Unsurprising given their remit, all MINFOF officials reported competent identification skills, whilst 80% of Justice officials could also do so, which was linked to involvement in specific court cases. Other LEA officials acquired such abilities through trainings or reference guides, including tools provided by TRAFFIC, such as the CITES Ivory Identification Guide; others mentioned media reports on seizures and TV programmes.

TABLE 7

Number and percentage of respondent with abilities to identify and seize commonly trafficked specimens.

| LEA          | RESPONSES | ABLE TO IDENTIFY COMMONLY TRAFFICKED SPECIMENS | PERCENTAGE  |
|--------------|-----------|--|-------------|
| MINFOF       | 15        | 15   | 100         |
| Justice      | 10        | 8  | 80.0        |
| Customs      | 11        | 6  | 54.5        |
| Police       | 9         | 5  | 55.6        |
| Gendarme     | 8         | 5  | 62.5        |
| <b>TOTAL</b> | <b>53</b> | <b>39</b>                                      | <b>73.6</b> |

Nearly six out of ten respondents said that they had directly participated in the seizure of protected wildlife specimens (live species or products) in Cameroon (Q8), with all MINFOF respondents experiencing such actions (Table 8). Though not charged with carrying out seizure actions themselves, 60% of Justice officials reported collaborating with other LEAs, especially MINFOF, as the direct Supervisors

of JPOs to assist with the issuance of search and arrest warrants and prosecutions of such crime in the courts. Less than half of the Customs officials had participated in seizures directly, whilst Police and Gendarmes reported lesser levels of direct participation, mostly in response to direct requests from MINFOF (Table 8).

TABLE 8

Number and percentage of respondents with direct participation in seizures of wildlife specimens.

| LEA          | RESPONSES | PARTICIPATED IN THE SEIZURE OF WILDLIFE SPECIMENS | PERCENTAGE  |
|--------------|-----------|---|-------------|
| MINFOF       | 15        | 15  | 100         |
| Justice      | 10        | 6   | 60.0        |
| Customs      | 11        | 5   | 45.5        |
| Police       | 9         | 2   | 22.2        |
| Gendarme     | 8         | 3   | 37.5        |
| <b>TOTAL</b> | <b>53</b> | <b>31</b>   | <b>58.5</b> |

With specific reference to seizures of elephant products (Q9), only one-third of all respondents have participated in a seizure event. MINFOF respondents had the highest level of participation at 53.3% (Table 9). However, some Customs Officials have carried out seizures. One of the Customs officials

led the team that seized 118 elephant tusks weighing 626 kg in October 2020 at Ambam in the South Region, resulting in the arrest of one suspect arriving from Gabon with the elephant tusks (TRAFFIC, 2020). Police and Gendarme officials reported considerably less experience in the seizure of elephant products (Table 9).

TABLE 9

Number and percentage of respondents with direct participation in seizures of elephant products.

| LEA          | RESPONSES | PARTICIPATED IN THE SEIZURE OF ELEPHANT PRODUCTS | PERCENTAGE  |
|--------------|-----------|--|-------------|
| MINFOF       | 15        | 8  | 53.3        |
| Justice      | 10        | 3  | 30.0        |
| Customs      | 11        | 4  | 36.4        |
| Police       | 9         | 1  | 11.1        |
| Gendarme     | 8         | 1  | 12.5        |
| <b>TOTAL</b> | <b>53</b> | <b>17.0</b>                                      | <b>32.1</b> |

An open-ended question on how the seized elephant products, mainly ivory, were managed (Q10), found that some MINFOF Officials reported sending mission reports and seized products up the chain of command to facilitate next steps in seizure procedures and security of the products. Other MINFOF officials reported involvement in measuring, weighing, marking, and registering products and securing them in one of the decentralised storage facilities of MINFOF (adding that some elephant tusks were still in some of these places at the time of this report). Other MINFOF officials further reported that products received from other services, such as the Customs or the Courts, had been measured, weighed, marked, registered, and sent to the MINFOF central storage facility, (as was the case of the Ambam seizure mentioned in Q9), along with the requisite reports about the seizure.

Justice officials stated that seized products were returned to MINFOF after examination as evidence during or after court case procedures were over. Customs indicated that seizure products and accompanying reports were

jointly sent to MINFOF to properly manage the tusks as the seizure cases continued in the courts. Officials from Police and Gendarmes said that they had not managed any of the seized products because their participation was part of a broader MINFOF-led team which directly handled all management issues. It is important to note that, at least concerning elephant ivory cases described in responses to the questionnaires, all of the seized products were reportedly sent to MINFOF for security and centralisation.

All MINFOF and Justice officials reported collaboration with other LEAs or organisations in the course of their work concerning wildlife law enforcement or seizures (Q11). 36.4% of Customs, 22.2% of the Police, and 37.5% of Gendarme Officials have also collaborated with MINFOF (Table 10). MINFOF, Justice, and Customs Officials also discussed collaborating with NGOs such as TRAFFIC on court case management, provision of training tools and reporting to ETIS, WWF and LAGA on investigations, arrest operations and court case management.

TABLE 10

Number and percentage of respondents who collaborated with other LEAs and organisations.

| LEA          | RESPONSES | PARTICIPATED IN THE SEIZURE OF WILD-LIFE SPECIMENS | PERCENTAGE  |
|--------------|-----------|--|-------------|
| MINFOF       | 15        | 15   | 100         |
| Justice      | 10        | 10   | 100         |
| Customs      | 11        | 4  | 36.4        |
| Police       | 9         | 2  | 22.2        |
| Gendarme     | 8         | 3  | 37.5        |
| <b>TOTAL</b> | <b>53</b> | <b>34.0</b>  | <b>64.2</b> |

### Concerning challenges and recommendations for improvement (Q12 – Q14)

This segment of the questionnaire concerns understanding any difficulties officials have experience in conducting their work as a means to elicit salient issues that may require remedial attention in order to improve the management of ivory stockpiles. Respondents were asked to present four major challenges they had faced in managing seized elephant ivory (Q12). Though presented from different perspectives given the purview of each of the LEAs consulted, the challenges mentioned can be grouped as follows:

- i. **Resources:** The lack of material and financial resources was a common theme, ranging from the need for basic weighing and measuring equipment to the absence of road-worthy vehicles for field activities and transportation of seized ivory to the centralised store in Yaounde. Funds were needed to buy essential materials for carrying out field activities and performing a range of basic activities associated with stockpile management.
- ii. **Capacity:** The need to enhance capacity through recurrent training was commonly expressed by all respondents with reference to understanding Cameroon's legal frameworks, the identification of elephant products, knowledge about CITES, ETIS, and the availability of ETIS data collection forms, and how to mark and manage wildlife products amongst other issues.

- iii. **Storeroom:** According to many LEAs, especially MINFOF and Justice, most storerooms are inadequate and insecure for the purpose of keeping ivory stocks from seizures. The high-risk nature of the products was repeatedly raised, including fears of potential break-ins and looting.
- iv. **Court procedures:** As a concern of mainly MINFOF staff and directly linked to point iii above, the need to present seized ivory tusks as evidence during court hearings created exposure to attack during transportation or theft due to insecure storage at the courts.
- v. **Collaboration:** Many respondents also expressed the need for better cooperation and collaboration with other LEAs before, during, and after seizure events. Formalised communications was an important issue for consideration.

Other responses to Q13-14 presented suggestions for improving the management of seized elephant ivory, which are captured among the recommendations in the last section of this report (specifically Section 5.12).



*A close-up of an elephant's tusk*

## 4.5 FIELD OBSERVATIONS

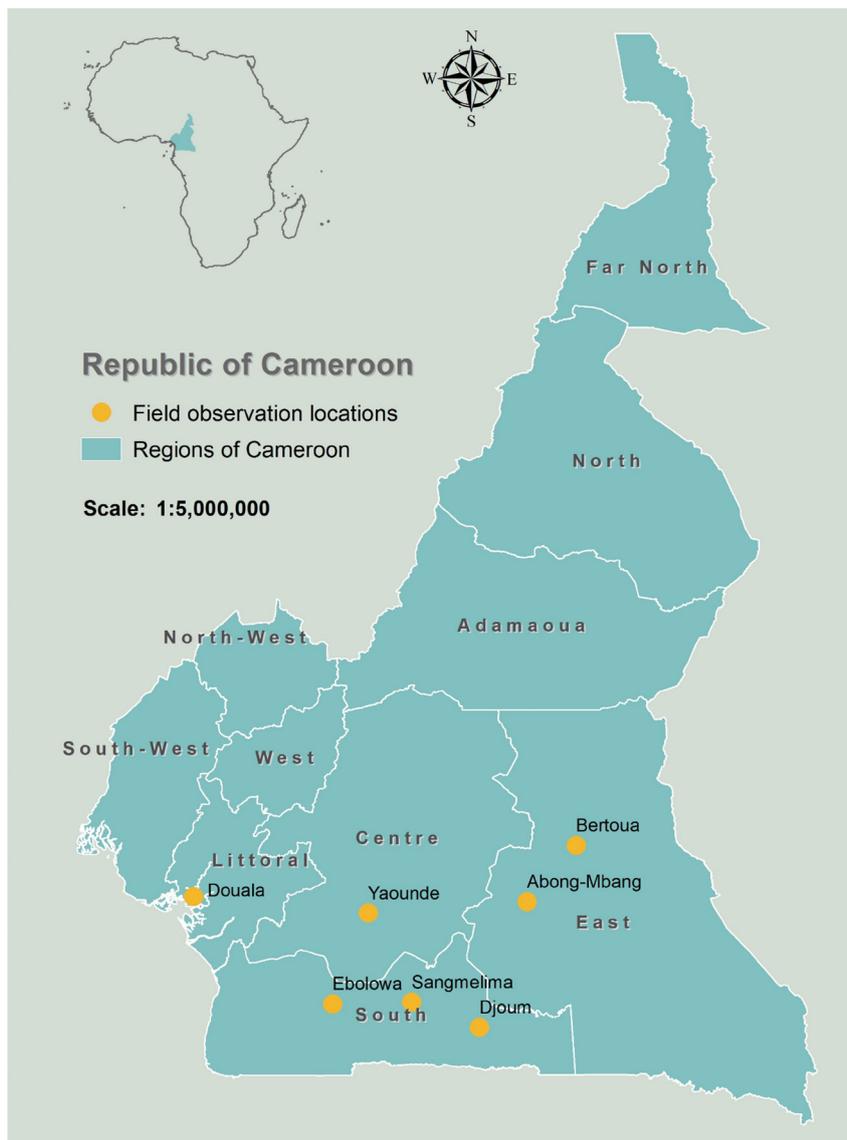
To complement the questionnaires exercise, field observations were carried out during a series of missions from 3 January to 17 February 2023 to Yaounde, Sangmelima, Djoum, Ebolowa, Abong Mbang, Bertoua, and Douala. The selection of the places visited was based on the geographic coverage of the project, an initial scoping exercise and information from MINFOF and TRAFFIC. The first-hand view of how existing stockpiles were being managed in specific locations facilitated the identification of gaps and problematic implementation issues against the Cameroon's legal framework for ivory stock management. This provided insights into where logical improvements to the system could be made for the purpose of developing a robust and updated management system. In addition to the challenges mentioned by respondents in the questionnaire exercise, the following were observed during field visits, accompanied by insights gained from conversations with officials who were facilitating access to location:

- **Scarcity of information:** Many individuals consulted were not aware of Decision 0003/2014, which constitutes the main regulatory framework outlining rules and procedures governing ivory stock management, including the identification of those responsible for marking, labelling, recording and storing national ivory stocks in Cameroon. Unfortunately, the dissemination of ivory stock management information to those concerned has been ineffective, and most field staff remain unaware of this fundamental Decision, including MINFOF staff.
- **Existing ivory stocks:** In some locations, ivory stockpiles were found. Some of the stocks were pending final judgements in the court before they could be moved, but others were found simply because no secure means of transport to the national centralised stockpile facility in Yaounde was available. Resolution of such issues will entail addressing a range of funding and procedural issues before the consolidation of ivory stocks can be realised.
- **No standard and secure storerooms:** In some locations, basic offices were used as storage facilities for ivory specimens. Consequently, unmarked ivory was found stored in various divisional and regional offices of MINFOF throughout the country, as well as at some court facilities. In all these cases, adequate security measures were found lacking and the stocks remained insecure and vulnerable to theft.
- **Lack of basic equipment:** In many locations, there was a total absence of basic equipment needed for ivory stockpile management processes, including scales for weighing, measuring tapes, bold markers for marking ivory specimens, registers and other stationary needs, and computers. Some officials mentioned using personal funds to provide for certain needed items or requesting them from collaborators whenever seizures occur.
- **Lack of resources:** Beyond equipment for stockpile management, there was a general lack of materials, such as vehicles, to facilitate the transportation of seized ivory. Additionally, lack of tools such as the ETIS Manual, wildlife product identification guides and many other related documents was observed, hence a lack of capacity in many domains that impacts law enforcement and stockpile management procedures.
- **Inadequate collaboration:** In some instances, mention was made of a lack of collaboration between the various LEAs and MINFOF, especially court officials. In some locations, seized ivory presented at court proceedings was still being kept in the courts long after the pertinent cases had reached judgement. The failure to handover stocks to MINFOF was an unresolved problem.

All these issues will need to be addressed going forward to ensure that a robust and accountable ivory stock management system is realised in Cameroon.

MAP 1

Places of field observations.



#### 4.5 ASSESSMENT OF CAMEROON USING THE STOCKPILE MANAGEMENT CHECKLIST FROM MILLIKEN & COMPTON (2019)

The following checklist from Milliken and Compton (2019) is designed to help countries evaluate the status of existing stockpile management systems by assessing the applicability of a range of issues that generally are attributes of legally based, efficient administrative systems.

The checklist allows any country to review their present system by identifying gaps that need to be addressed to strengthen performance and security. Where stockpile management remains poorly developed or is absent altogether, the checklist provides

a useful first step to understand the basic parameters of holistic, integrated, and credible nationwide systems. This checklist is not exhaustive and may require the inclusion of additional questions depending on national circumstances. The checklist exercise should be seen as a diagnostic tool for zeroing in on issues that need further attention (Table 11). Those components that yield 'No' response can become the basis for a future work plan aimed at achieving best-practice stockpile management results. In the following table, responses highlighted in green denote "Yes" and those in red denote "No".

TABLE 11

A Checklist to Assess the Status of Stockpile Management in Cameroon.

| NO.      | STOCKPILE MANAGEMENT COMPONENT / QUESTION  | RESPONSE (TICK ONE) |    | SOLUTION TO 'NO' RESPONSE  |
|----------|--|---------------------|----|--|
| <b>1</b> | <b>ESTABLISHING A SOUND LEGAL MANDATE FOR STOCKPILE MANAGEMENT</b>   |                     |    |  |
| 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 | Law No. 94/01 of 20 January 1994 establishes the management of forests, wildlife, and fisheries, mandating MINFOF to protect and manage forest and wildlife resources (Article 11), as well as the management of seized wildlife products (Article 145).   |
| 1.2      | Does national legislation specify the overarching purpose and basic institutional framework of the stockpile management system?  | Yes                 | No | Though not a law, Decision 0003/2014 provides a basic regulatory and binding framework for stockpile management, but future amendments may be required to clarify certain issues.  |
| 1.3      | Does national legislation establish accountability and make the security of government stocks a priority concern?  | Yes                 | No | This issue needs to be addressed when Decision 0003/2014 is reviewed, updated, and amended.  |
| 1.4      | Do implementing regulations define the scope concerning which wildlife commodities or products need to be part of the stockpile management system?   | Yes                 | No | Sections 1.1 and 1.2 of Law No. 94/01 guide the management of seized wildlife specimens and materials, and Decision 0003/2014 specifically concerns ivory stockpile management.  |
| 1.5      | Do implementing regulations specify marking systems and the information relating to specimens that need to be recorded for each of the target commodities and their timely execution?  | Yes                 | No | Article 4 of Decision 0003/2014 specifies the marking system for ivory.  |
| 1.6      | Do implementing regulations require a national database for tracking all stocks?   | Yes                 | No | Article 11 (2) of Decision 0003/2014 calls for a national database.  |
| 1.7      | Do implementing regulations mandate reporting of stocks through government channels, including in fulfilment of international reporting requirements?  | Yes                 | No | Article 11 (1) of Decision 0003/2014 requires internal quarterly reports but nothing is said about international reporting to CITES.   |
| 1.8      | Do implementing regulations mandate periodic audits of   | Yes                 | No | Article 11 (1) of Decision 0003/2014 provides for audits.  |
| <b>2</b> | <b>DEFINING INSTITUTIONAL ROLES AND RESPONSIBILITIES FOR EFFECTIVE AND SECURE STOCKPILE MANAGEMENT</b>   |                     |    |  |
| 2.1      | Do lead agencies for stockpile management have an authorised structure for the administration of stockpile management?   | Yes                 | No | Decision 0003/2014 designates MINFOF, through its centralised and decentralised administration, as the lead agency.  |
| 2.2      | Has an operational protocol for stockpile management been developed that describes the system through various chains of custody from first acquisition to placement in a storage facility for safekeeping to disposal or final destruction?  | Yes                 | No | While some Articles such as 5, 7, 9 and 11 mention services and authorities charged with certain tasks, Articles 4 and 6 of Decision 0003/2014 do not specifically assign responsibilities, such as who marks the ivory or fills out the ETIS forms. This should be addressed if the Decision is reviewed, updated, and amended, as recommended in this report.                                      |
| 2.3      | In the operational protocol, at each step along the chain of custody, is the person ultimately responsible for the stocks at hand clearly identified?  | Yes                 | No | Articles 7 and 9 of Decision 0003/2014 and Decree No. 2005/099 of 6 April 2005 making MINFOF personnel responsible for stockpile management.   |
| 2.4      | If more than one lead agency is involved in stockpile management, has a coordination mechanism and structure been established to facilitate regular communication, joint implementation, standardisation, information management and reporting, etc., between the designated institutions? | Yes                 | No | MINFOF is the lead agency, and all other LEAs should, in the event of the MINFOF's absence, ensure that the seized ivory is channelled to the competent MINFOF authority as proposed in this document.   |
| 2.5      | Beyond the lead agencies, are other institutions which may be responsible for seizing targeted stocks aware of the stockpile management system and integrated into its operation and implementation?   | Yes                 | No | Current practice is more ad hoc than systematic, whereby ivory seized by other LEAs is automatically retroceded to MINFOF. However, collaboration between MINFOF and these institutionally separate LEAs, especially Customs, has been recorded concerning seizures of elephant ivory and other wildlife products. As in 2.4, this issue needs formal clarification in the regulatory documentation. |

|          |  |     |    |   |
|----------|--|-----|----|---|
| 2.6      | Are internal and external reporting requirements on the status of stocks clearly established with designated personnel responsible for their execution?  | Yes | No | Article 11 (1) of Decision 0003/2014 clearly states that an updated statement of the ivory stock must be sent quarterly to the Minister in charge of Wildlife by the local officer in charge of Wildlife. However, no such mention is made of reporting requirements to CITES. This aspect should also be considered during the review process. |
| 2.7      | Are penalties for failure to secure stocks adequately or implement the stockpile management system clearly articulated in the regulations of the lead institutions?  | Yes | No | Article 12 of Decision 0003/2014. By inference, all legal measures will be taken following the Cameroon legal system.   |
| 2.8      | Are ivory stock management responsibilities clearly described and included in the Terms of Reference (ToRs) of employment contracts of key personnel so that future accountability is evident from the outset? Again,  | Yes | No | For some positions, especially the appointment of Focal Points e.g., for NIAP, the roles are well defined, but this is not clear for all services, either centralised or decentralised.   |
| 2.9      | Are stockpile management responsibilities of key staff assessed during annual performance evaluations?   | Yes | No | No information was provided as this is MINFOF's internal process  |
| <b>3</b> | <b>DEVELOPING STANDARD OPERATING PROCEDURES (SOPS) TO PROMOTE UNIFORM AND ACCOUNTABLE PERFORMANCE FOR STOCKPILE MANAGEMENT</b>   |     |    |   |
| 3.1      | Have potential chains of custody been anticipated and mapped out so that most avenues of the first acquisition of targeted stocks have been addressed and are supported with relevant SOPs concerning what to do next?   | Yes | No | Decision 0003/2014 provides a basis, but probably can be improved.  |
| 3.2      | For each particular function in the chain of custody (i.e., taking custody of stocks, marking and registration, recording and reporting of information, forensic examination, use as evidence in court cases, transfer to temporary or long-term storage facilities, audit procedures, etc.), are SOPs in place and available to relevant staff so that implementation at a national level always proceeds in a standardised manner? | Yes | No | Decision 0003/2014 provides a basis, but probably can be improved.  |
| 3.2.1    | Do law enforcement staff operating at ports of entry/exit, in protected areas, policing markets, or investigating wildlife trade crime have access to SOPs if they find, detect, seize or otherwise take custody of targeted stocks?   | Yes | No | For MINFOF, it is clear, but not for other LEAs.  |
| 3.2.2    | Do law enforcement staff who engage in criminal investigations or judicial proceedings relating to targeted stocks, etc., have access to SOPs on securing, managing, and finally disposing of targeted stocks that were used for forensics examination, as evidence court cases or other related activities?   | Yes | No | Forensics examination is not a systematic action, and this domain lacks capacity and materials.   |
| 3.2.3    | Do administrative and security staff at core or peripheral storage facilities for targeted stocks have access to SOPs on securing, marking and registration, moving, or disposing of targeted stocks in their possession?  | Yes | No | For MINFOF, it is clear, but not for other LEAs.  |
| 3.2.4    | Do administrative and security staff at core or peripheral storage facilities for targeted stocks have access to SOPs on moving or disposing of targeted stocks in their possession?   | Yes | No | For MINFOF, it is clear, but not for other LEAs.  |
| 3.2.5    | Do administrative staff at the local, regional or national levels all have access to SOPs that support overall implementation, coordination, tracking, national and international reporting, etc., of the stockpile management system?   | Yes | No | Clear for MINFOF, but not for other LEAs.   |
| 3.2.6    | Are site-specific security staff fully apprised of the risks associated with stockpile management and have access to SOPs that detail security considerations?   | Yes | No | Sites are managed by MINFOF staff, and they are aware of the risks associated with stockpile management. They also have internal procedures to attenuate these risks.   |

|          |  |     |    |  |
|----------|--|-----|----|--|
| 3.2.7    | Are SOPs readily available for the appointed storekeeper at each designated core or peripheral storage facility for a range of responsibilities and circumstances that are likely to unfold.   | Yes | No | For MINFOF   |
| 3.2.8    | Are data management functions underpinned by SOPs so that staff at local, regional, or national levels understand the requirements and are equipped to undertake them effectively?   | Yes | No | Capacity and equipment needed  |
| <b>4</b> | <b>BUILDING CAPACITY FOR STOCKPILE MANAGEMENT</b>  |     |    |  |
| 4.1      | Are security staff associated with core or peripheral storage facilities adequately trained and equipped to ensure that targeted stocks remain secure from theft and leakage?  | Yes | No | Capacity and equipment are direly needed   |
| 4.2      | Does training for those holding supervisory positions  | Yes | No | Special capacity-building sessions need to be initiated, especially with the support of partners such as TRAFFIC.  |
| 4.3      | Does the Database Manager within the stockpile management system benefit from specialised training so that information   | Yes | No | Given that there is no staff dedicated only to this, and the transferability of MINFOF staff from one place to another, or one service to another, this should be considered in planned activities.  |
| <b>5</b> | <b>FINANCING THE STOCKPILE MANAGEMENT PROGRAMME SO THAT IT REALISES ITS FULL POTENTIAL</b>   |     |    |  |
| 5.1      | Is stockpile management specifically built into the budget of the lead institution(-s) charged with the long-term holding, disposal and/or destruction of targeted stocks?   | Yes | No | Through MINFOF and other concerned Ministries, the Cameroon government should ensure that funding needs are captured in the national budget. Partners such as TRAFFIC should also consider funding support.  |
| 5.2      | Is recurrent expenditure for stockpile management adequately accounted for within current budgetary processes?   | Yes | No | Stockpile management is not specifically addressed, but this should be part of the NIAP implementation and other stockpile management budget and the support of partners.  |
| 5.3      | Is capital investment required and available in existing budgets to construct or remodel storage facilities or other infrastructure for holding stocks to ensure adequate space and security or the purchase of essential equipment, such as computers for information management? | Yes | No | As in 5.2, this is not specifically addressed and should be part of the NIAP process, and other activities on stockpile management. Partners should also support, through targeted funding, for constructing or acquiring adequate storage facilities. |
| 5.4      | Are annual stockpile management work plans developed to support the continuous operation and development of the full programme over time?  | Yes | No | Account for in line with general MINFOF work plan activities and projects from partners, such as TRAFFIC's support to NIAP implementation.   |
| 5.5      | Are current resources available to the government adequate to support a robust stockpile management system?  | Yes | No | As in 5.1, there is no dedicated budget and not enough funds from partners.  |
| 5.6      | Have external donors ever been engaged to support stockpile management programmes in your country?   | Yes | No | Through NGOs such as TRAFFIC, WWF and WCS for implementing different projects and programmes.  |



*African Elephant Loxodonta africana*

## 5: ISSUES TO ADDRESS FOR DEVELOPING STANDARD OPERATING PROCEDURES FOR CAMEROON'S NISMS

The coverage of SOPs should follow the point of the first collection of ivory through the different stages of management which may include various institutional agencies in distant field stations and court houses before being consolidated into a centralised storage facility managed by a single authority.

The audience for SOPs constitutes those officials and staff that may, on occasion, become responsible for dealing with ivory

stocks that come into government possession for any number of reasons. In this regard, SOPs remain informative intra-governmental communications to ensure continuity and standardisation of performance in the management and security of ivory stocks at a national level. By fostering understanding, accountability, and transparency all along the chain of custody, SOPs play an integral role in the realisation of efficient stockpile management programmes.

This section is designed to provide content that would be suitable for the development of SOPs for ivory stock management in Cameroon which could be used to address existing gaps and other issues that arose from the feedback of law enforcement officials and from direct field observations. It also builds on the understanding of current legislation and legal requirements as assessed in this report, including international obligations under CITES. SOPs strive to ensure broad buy-in not just from MINFOF officials, who necessarily will be key players, but also with all other LEAs and the Courts that occasionally acquire ivory stocks. Thus, SOPs that arise out of interactive processes that involve all government actors

will be more effectively implemented going forward than those that derive from top-down approaches. It is envisioned that SOPs could be issued as a series of tailored guidance documents -- perhaps in a thematic booklet form -- which collectively address all of the rules and regulations, protocols and procedures, "do's and don'ts" that various actors need to be cognisant of when performing the range of tasks that together constitute ivory stockpile management in Cameroon. It is therefore anticipated that holding a series of stakeholder workshops and meetings will engender broad institutional support and understanding, producing the best results for long-term and effective application.

## 5.1 DEFINITIONS OF SOURCE OF IVORY CODES USED IN CAMEROON

The initial step in the chain of custody is triggered when ivory of any description falls into the hands of government authorities. This can occur passively or from active government interventions. Under the authority of MINFOF, Article 1 of Decision 0003/2014 presents two and three-letter codes for four sources of ivory (Table 12): stocks resulting from seizures made during anti-poaching operations; administrative hunts or culling exercises; found carcasses of elephants that died of natural causes; and ivory from judicial cases. However, ivory can potentially derive from other sources, but currently there are no specific codes for any other sources. The English translation of this Decision seems to suggest that the code 'LAB' is restricted to seizures pursuant to anti-poaching operations, but not to seizures that occur, for example, at ports of exit, in domestic ivory markets or at checkpoints along roads.

This may be a French-to-English translation issue, but it needs clarification. If the term is narrowly restricted to anti-poaching operations, then other forms of ivory seizures need to be given appropriate codes.

Stocks can also be handed over to government from individuals as personal stocks or simply be 'found' but not in association with an elephant carcass. Finally, it is conceivable that in some instances the source of ivory will remain 'unknown', so a code for that contingency is also warranted. Thus, the issue of ivory sources could benefit from further consideration and consultation with stakeholders to ensure that all potential sources of elephant ivory have codes. It may also be useful to standardise codes to two digits in the future.

TABLE 12

Source of ivory codes in Cameroon.

| SOURCE OF IVORY                     | CODE |
|-------------------------------------|------|
| Anti-poaching operations            | LAB  |
| Administrative hunts or culling     | BA   |
| Found carcasses from natural causes | MN   |
| From judicial proceedings           | SC   |

### RECOMMENDATION

1. Undertake a review of Article 1 of Decision 0003/2014 to ensure that all potential sources of ivory have standardised source codes, which possibly could be achieved through amendment to the Decision; as appropriate, integrate any additional codes into the marking system and promote their usage by all other law enforcement agencies in Cameroon.

## 5.2 DEFINITIONS OF TYPE OF IVORY CODES USED IN CAMEROON

Article 2 of Decision 0003/2014 provides for five types of ivory: ‘raw’, ‘semi-worked’, ‘worked’, ‘fresh’ and ‘old’ as described in Table 13. These five ivory categories were all part of the ETIS data collection form when the monitoring programme was first launched in 1998, however, following CITES CoP15 in March 2010, three of these ivory types -- ‘semi-worked’, ‘fresh’ and ‘old’ -- were abandoned as they served no useful analytical purpose. In this regard, ‘semi-worked’ ivory was subsumed into the ‘worked ivory’ category. The descriptive judgements of ‘fresh’ and ‘old’ ivory was also dropped as obsolete, but these terms had never been used as an alternative ivory type in ETIS for either ‘raw’ or ‘worked’ ivory. Equally, the CITES requirement that Parties report the status of their ivory stocks annually

only identifies two types of ivory -- ‘raw’ and ‘worked’ -- as evidenced by paragraph 7e of Resolution Conf. 10.10 (Rev. CoP19) and the data collection form that the Secretariat has circulated for reporting purposes (CITES, 2023b; see Table 15). Logically speaking, the categories for ‘fresh’ and ‘old’ ivory are not exclusive, for example, a seized tusk could be both ‘raw ivory’ and ‘fresh ivory’ at the same time. Further, a tusk marked as ‘fresh ivory’ at one point could be considered ‘old ivory’ at a future date, but it would still remain as ‘raw ivory’ regardless of the transition. In summary, the utility of certain terms for the purpose of categorising ivory types could benefit from consideration in Cameroon’s legal framework for ivory stock management.

TABLE 13

*Type of ivory codes in Cameroon.*

| TYPE OF IVORY     | CODE | DESCRIPTION   |
|-------------------|------|---|
| Raw Ivory         | IB   | Whole ivory tusks still in a raw state, polished or unpolished, and any cut piece of ivory, polished or unpolished, whose original shape has been altered. Raw ivory includes tusks that are broken or cut into pieces but not otherwise shaped or processed. |
| Semi-Worked Ivory | IST  | Ivory already cut and shaped to some degree but not yet a finished product, e.g., ivory blocks cut into the shape of a blank personal seal.   |
| Worked Ivory      | IT   | Ivory carved, shaped, or transformed, either wholly or partially, but does not include whole tusks unless it has been carved.   |
| Fresh Ivory       | IF   | Ivory from recent poaching or recent natural death with traces of blood or flesh but not otherwise showing discolouration or cracks due to age; the edges of the tusk are sometimes sharp (and not blunt) where it was cut out of the animal.                 |
| Old Ivory         | VI   | Ivory that has been in storage for a long time, is fragile or shows a weathered, discoloured or cracked appearance. Old ivory includes pre-Convention ivory (as per Resolution Conf. 13.6 and Resolution Conf. 5.11).   |

### RECOMMENDATION

2. Article 2 of Decision 0003/2014 should be amended to provide for only two categories of ivory – ‘raw ivory’ and ‘worked ivory’; in agreeing that amendment, ‘semi-worked ivory’ should be considered as ‘worked ivory’ in the future. Once agreed, the terminology for ivory type should be promoted for standardised use by other law enforcement agencies in Cameroon.

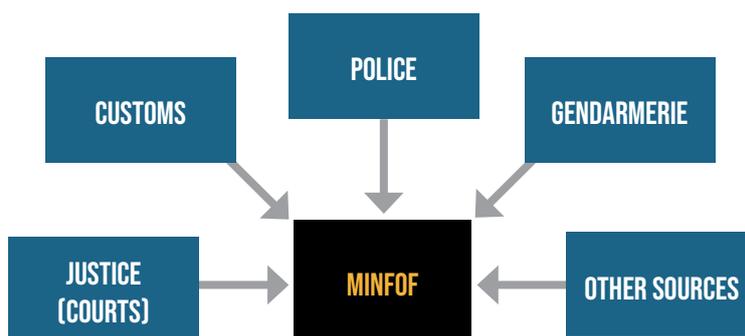
### 5.3 STRENGTHENING MINFOF'S CENTRAL ROLE IN MANAGEMENT OF IVORY STOCKS

At some point, all ivory stocks which are the property of the Cameroonian State should be held and controlled by MINFOF given their legal purview over wildlife. As described in detail in this report, law enforcement actions involving Customs, Police or Gendarmerie will also

result in ivory seizures. Cameroon's regulatory framework suggests that the seized ivory and other elephant products which originate from other LEAs should ultimately be channeled to MINFOF for centralised consolidation (Figure 4).

FIGURE 4

Channeling of ivory to MINFOF from LEA.



However, field observations associated with this report indicated that some ivory stocks have remained outside of MINFOF control for long periods of time. Accordingly, the reasons

for such delays would certainly benefit from further review and clarification, and further steps to buttress the authority of MINFOF as the central authority might be useful.

#### RECOMMENDATION

3. Reassert and strengthen appropriate legislation and regulatory frameworks to ensure that MINFOF is institutionally recognised as the final and centralised authority over all forms of ivory that come into the hands of any other government agency.

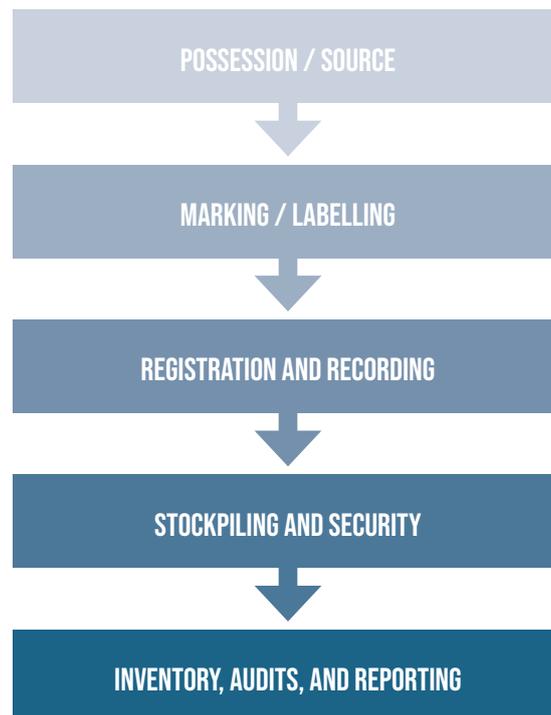
### 5.4 MAIN STEPS IN IVORY STOCK MANAGEMENT

Figure 5 shows the five basic steps of ivory stockpile management that flows from initial acquisition of ivory stocks at the source, to the marking and labelling of individual specimens, to formal registration and recording of each piece in the centralised database, to stock consolidation and security at storage facilities and, finally, to periodic audits and reporting. Each step rests upon repetitive interventions and actions that need to unfold in

a standardised, consistent manner regardless of the institutional authority involved. SOPs are required for describing all the processes and procedures that need to be followed at each of these stages and made readily available to all officials likely to be engaged in such activity. Effective ivory stock management is built upon a strong sense of teamwork embraced by all institutional players.

**FIGURE 5**

*Main stages of ivory stockpile management.*



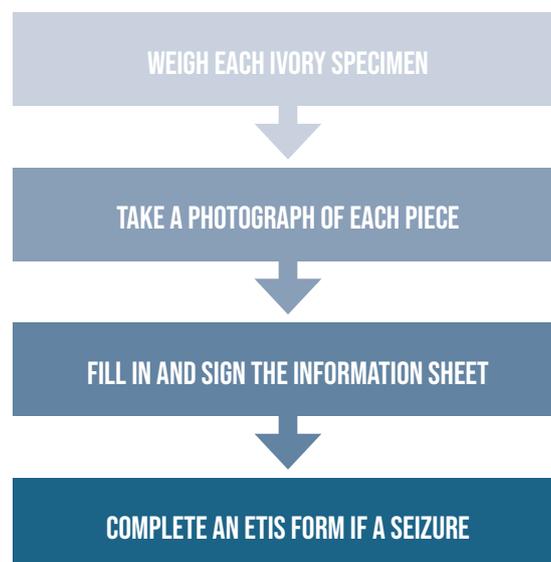
## 5.5 INITIAL POSSESSION OF IVORY AT SOURCE

The initial reception process for any authority taking possession of ivory stocks for the first time is described in Figure 6. Immediately after an ivory seizure, or upon receiving ivory stocks from another LEA, all ivory specimens need

to be quickly processed to ensure that what has been received conforms with the detail of accompanying reports or documentation describing what the government has taken possession of at the source.

**FIGURE 6**

*Initial actions upon reception of any ivory specimens.*



If possible, knowing the exact weight of each specimen and taking a photo at the point of reception ensures that every component of the ivory inventory in question has a basic means of identification, even if a proper marking and registration exercise still needs to be undertaken. All pertinent information needs to be recorded in a formally approved, standardised information sheet that captures every specimen in the inventory. At the very least, especially if basic equipment (e.g., weighing scales, cameras, smart phones, etc.) are not available, the number of pieces need to be counted by ivory type and a sequential number put on each specimen, so the

quantity is known. To the extent possible, the information sheet should list each specimen sequentially and capture its weight, description of the items, place and circumstances of the acquisition, provenance, method of concealment (if applicable), the identity of suspects or arrested individuals (if applicable), and other information as appropriate. Upon completion, the information sheet should be signed and dated by the individual who led the initial reception process. Additionally, if the ivory was derived from a seizure event, the ETIS data collection form should also be completed (see next section).

### RECOMMENDATIONS

4. Ensure that the information sheet used in the initial reception process has been approved by the Cameroon government and is legally supported by the regulatory framework as appropriate so that it is used by all law enforcement agencies whenever ivory comes into their possession without exception. Review the content of the standardised information sheet and ensure that the required content is adequate, including from the standpoint of other LEAs who may be the first to acquire the ivory at source.

5. Where seizures are concerned, ETIS data collection forms need to be filled out during the initial reception process for the ivory in question so that all the vital information is captured whilst it is still fresh and then sent to ETIS focal point at MINFOF. These requirements need to be specifically reflected in the legal framework as appropriate.

## 5.6 REPORTING IVORY SEIZURE CASES TO ETIS

Once ivory has been acquired, another follow-on activity concerns reporting to ETIS (Figure 6). CITES Resolution Conf. 10.10 directs: *“All Parties should provide information on seizures and confiscations of ivory or other elephant specimens within 90 days of their occurrence.”* In this regard, CITES Parties have an obligation to become data providers to ETIS whenever ivory seizures occur within their national borders. Accordingly, Article 6 of Decision 0003/2014 states that:

*any seizure of ivory or elephant products will be subject to systematic completion of an ETIS form to be transmitted to the Minister in charge of wildlife within 90 days of the events, separately from the transmission of the seized ivory products.*

For ETIS reporting, Cameroon needs to use the standard data collection form and follow the ‘*Explanatory Notes for the Elephant Trade Information System (ETIS) Data Collection Form*’ (CITES, 2023c; see Appendices 3 & 4 of this report). The data collection form should be

transmitted to the ETIS Focal Point at MINFOF for eventual submission to ETIS or the CITES Secretariat. In Cameroon, to assist with ETIS reporting, the explanatory notes for reporting seizures can be found in the French-language ETIS Manual developed by TRAFFIC with a set of 21 questions (see Appendices 3 and 4 in Ngandjui & Ringuet, 2010).

For a record to be proactively used in ETIS, data concerning the source of information about the seizure, the date of the seizure, the agency responsible for making the seizure, the type of ivory and quantity of specimens involved or, if non-ivory elephant specimens are part of the seizure, the type and quantity of products is required. In seizure cases which involve cross border trafficking of elephant specimens, additional trade route information, if available, is important to include in any ETIS report as it informs the analytical modelling of the system.

The country of origin, country of export, countries of transit, or the country of destination/import should be identified to

the extent that is reliably known. And finally, if available, a range of other optional information to understand illegal ivory trade activity is requested, for example, the type of illicit activity transpiring at the point of seizure, the kind of transport being used, the methods of detection, and the nationalities of any individuals arrested in conjunction with the seizure. Notwithstanding the ideal CITES directive concerning the reporting of seizure cases within 90 days of their occurrence, Resolution Conf. 10.10 (Rev. CoP19) establishes 31st March of each year as the due date by which time all elephant product seizure cases that transpired in the previous year need to be reported to ETIS for inclusion in the database.

In fact, ETIS reporting by Cameroon has been very poor in recent years and ways to

improve the situation need to be considered and implemented. In the ETIS report to CoP19, it was reported that “*Cameroon which did not report to ETIS between 2017 – 2020*”. However, in the ETIS database for 2018 through 2020, 25 ivory seizure cases were reported by other sources as occurring in Cameroon by the World Customs Organisation, the EAGLE law enforcement network, TRAFFIC and other media sources; the CITES document also noted that Cameroon had subsequently registered to participate on ETIS Online portal and that subsequently had “*reported 2021 data within the deadline*”, indicating that ETIS reporting might qualitatively improve in the future (CITES, 2022b).

#### RECOMMENDATION

6. Responsibilities for ETIS reporting need to be reasserted in the regulatory framework for Cameroon by specifically identifying the ETIS Focal Point in MINFOF as the recipient of information on all ivory seizure cases in the country for onward reporting internationally to CITES and TRAFFIC for inclusion in the ETIS database.

## 5.7 MARKING AND LABELLING FORMULAS FOR IVORY STOCKS

The next action in the process is to physically mark each individual ivory specimen to give it a distinct identity. The marking of ivory is a necessary step to ensure future traceability of ivory stocks, which is an essential requirement of any stock management system. The earlier the marking is carried out, the lower the risk of stocks leaking into illegal trade again as, once marked, the ivory becomes “traceable” (Mashini & Nkoke, 2020). Marking on each ivory specimen needs to be permanent, clearly visible, and legible.

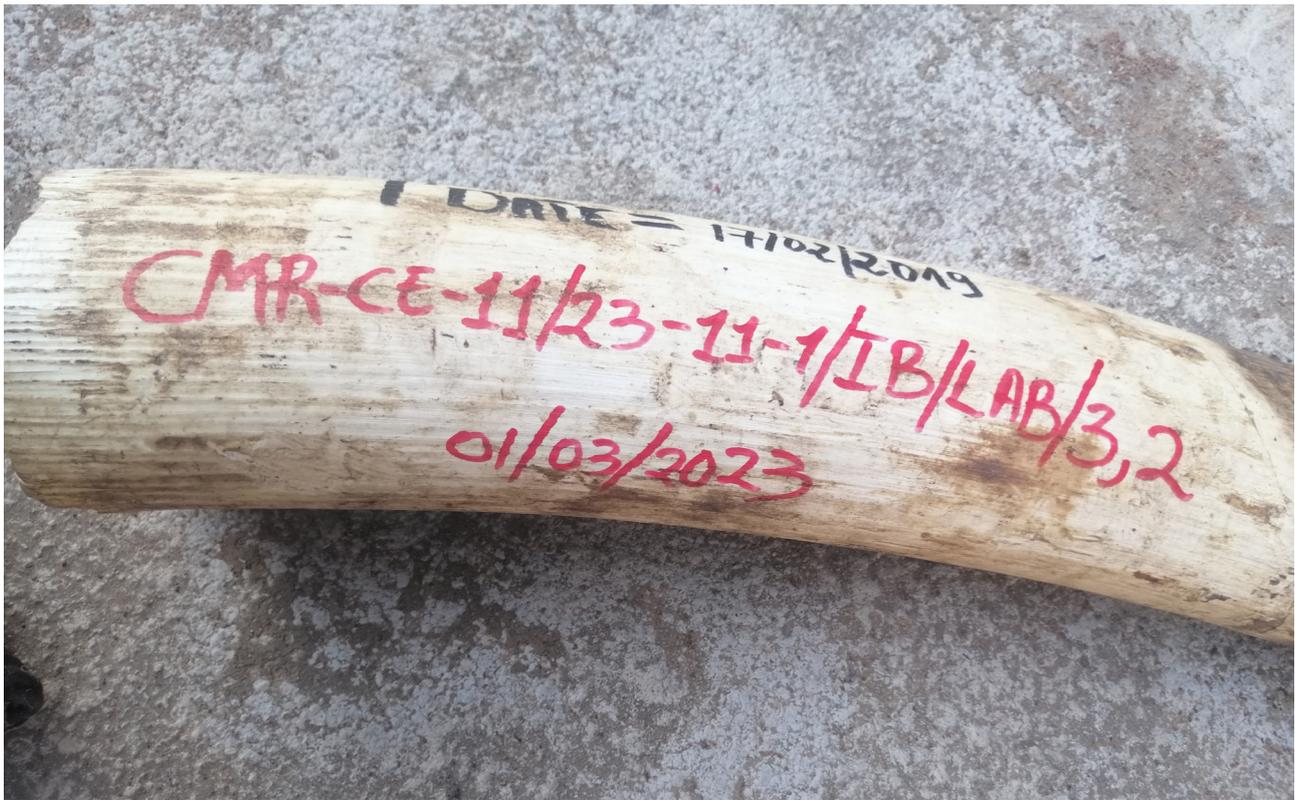
Article 4 of Decision 0003/2014 prescribes Cameroon’s marking requirements, which generally conform with CITES Resolution Conf 10.10, but with certain adaptations to capture additional information. Article 4 specifies that whole ivory tusks of any size and cut pieces of ivory, which have both a length of 20 cm or more and a weight of one kilogram or more, must be marked by engraving, or with indelible ink, or by another unspecified means following a detailed formula. In this regard, for example, a tusk could be marked: **CMR-CE-11/23-11-1/IB/LAB/3,2** whereby the letters and numbers represent:

- **CMR = Cameroon**, using the three letter ISO code;
- **CE = Centre Region**, using Cameroon’s regional codes presented in Table 11;
- **11 = Serial Number**, meaning the 11th tusk marked in the marking exercise;
- **23 = Year**, meaning the last two digits of 2023;
- **11 – 1 = Serial Number** for the year in question;
- **IB = Raw ivory**, using Cameroon’s ivory type codes presented in Table 12;
- **LAB = Seizure from Anti-poaching**, using Cameroon’s codes for ivory sources presented in Table 13; and
- **3,2 = Weight** of the tusk in kg to the first decimal point.

Photo 1 depicts this particular ivory tusk which has been marked with an indelible red marker<sup>4</sup>.

PHOTO 1

An example of marked elephant ivory.



Specimens of worked ivory are not individually marked, but the container (e.g., a bag, a sack, box, or some other receptacle) in which the specimens are stored is essentially marked following the CITES formula generally described in paragraph 2 of Resolution Conf. 10.10 with some adaptations, for example, the quantity of ivory is the last figure in the formula. The worked ivory specimens are weighed together overall and counted one-by-one with the following marking formula written on the container: **CMR/19/27/15.5/105**. This example indicates that the container contains a total of 105 worked ivory specimens, collectively weighing 15.5 kg, representing the 27th lot of worked ivory products recorded in Cameroon's ivory stockpile in 2019.

Article 5 of Decision 0003/2014 requires that, even when marked, ivory specimens should also be labelled. The labelling procedure relates to the information to be presented on labels which are placed on the tusks or packaged pieces to indicate the following:

- the locality where the seizure was made, e.g., Limbe;
  - the date of the seizure;
  - the origin of the product (which should be known from the offence report);
  - the category of ivory, using Cameroon's ivory type codes presented in Table 12;
  - the serial number of the marking exercise;
  - the position of the person in charge who carried out the seizure, e.g., MINFOF Divisional Delegate for Fako;
  - the measurements of the ivory (length and weight);
  - the supervisor of the operation; and
  - the particular observations, e.g., the ivory was destined for Nigeria.
- the region, using Cameroon's regional codes presented in Table 13;
  - the department or division, e.g., Fako Division;

TABLE 14

Codes of Regions in Cameroon.

| REGION             | CODE |
|--------------------|------|
| Adamawa / Adamaoua | AD   |
| Centre             | CE   |
| Extreme North      | EN   |
| East               | ES   |
| Littoral           | LT   |
| North              | NO   |
| North West         | NW   |
| West (Ouest)       | OU   |
| South (Sud)        | SU   |
| South West         | SW   |

### RECOMMENDATIONS

7. The prescribed marking formula for Cameroon in Article 4 of Decision 0003/2014 is complicated and could benefit from review and reconsideration. Issues to consider are whether the two-letter ISO code (i.e., CM) is sufficient and should replace the three-digit code presently used; two serial numbers are necessary; whether ivory type (raw or worked) is clear without being part of the written formula; whether source codes are necessary; and perhaps other issues. If the marking system is streamlined or changed in any way, Article 4 of Decision 0003/2014 should be amended, and all changes communicated and implemented by all relevant institutions.

8. The prescribed labelling system for Cameroon in Article 4 of Decision 0003/2014 should be reviewed and its utility reconsidered if appropriate. It is possible that the information required for labelling of each specimen could be captured in the centralised database as information fields and do not need to be physically part of the ivory specimens in question. In any event, any subsequent changes agreed during the review process should result in amendments to Article 4 of Decision 0003/2014 and then communicated and implemented by all relevant institutions, as appropriate.

## 5.8 CONDUCTING A MARKING AND LABELLING EXERCISE FOR IVORY SPECIMENS

In many instances, the marking and labelling of ivory stocks is a component of a broader registration exercise. However, there may be circumstances under which the marking/labelling aspects of stockpile management are conducted separately to a formal registration of the stock in question, particularly when seizures are made by other LEAs. When undertaking a marking and/or labelling exercise for ivory, a stepwise process of basic procedures needs to be followed. These include:

**i. Equipment and staff preparations:**

Equipment requirements for a marking/labelling exercise need to be assembled, including indelible ink markers, scales

and tape measures for determining the weights and measurements of the specimens, suitable containers for preparing lots of worked ivory products if appropriate, a copy of the prescribed marking formula, a sufficient number of labels for attaching to each piece, and copies of the manual data collection sheets, writing pens for recording all the pertinent information or computers or tablets if information is being captured digitally. The personnel required for the marking exercise also need to be identified along with their specific roles and responsibilities in the exercise. For example, at least one person is probably

needed to be responsible for information management and capture the data for each specimen either manually or digitally; another person needs to read the weights of each piece from the scale, whilst another takes the measurements; probably someone else needs to mark the relevant information of the formula onto each specimen with a marker; other staff are needed for moving ivory specimens in and out of storage facility and to the weighing, measurement and recording stations of the exercise as appropriate. There may be other needs as appropriate.

**ii. Elephant ivory verification:** An initial examination of specimens should occur to ensure that all represent bona fide elephant ivory and not some other form of ivory or look-alike substitute commodity. In this regard, a key reference is the '*CITES Identification Guide for Ivory and Ivory Substitutes*' which can be downloaded from the CITES website (Baker et al., 2020). If non-ivory products are discovered, they should be readily identified and removed from the stock to be included in the ivory stockpile. Where non-ivory specimens are discovered, for example, raw hippo teeth or bone jewelry mistaken for elephant ivory, a report should be compiled and filed in the administrative system so that the information is shared within the institutional hierarchy.

**iii. Review of accompanying documentation:** Carefully check the attached physical report and other accompanying documentation, including any photographs, to ensure all information concurs with the stocks at hand and there are no anomalies to explain. Where discrepancies arise, especially if any stocks appear to be missing or otherwise tampered with, they need to be identified and brought to the attention of the administrative hierarchy immediately. In all but the most exceptional cases, such problems should not result in cancellation of the marking exercise for the other specimens at hand as long as they represent elephant ivory.

**iv. Marking of country, region, year, serial numbers and type and source of ivory:**

Probably the easiest way to proceed entails laying out lots of ten or more ivory pieces and begin the process by systematically marking them sequentially (*at this point in time*) with:

- the code for Cameroon, followed by a dash (i.e., -);
- the code for the appropriate region followed by a dash;
- the discreet serial number followed by a forward stroke (i.e., /);
- the last two digits of the year in question followed by a dash;
- the second serial number followed by a forward stroke;
- the type of ivory followed by a forward stroke; and
- the source of ivory followed by a forward stroke.

All of this information should be readily known as a result of step iii which entails a review of the documentation accompanying the stocks that should describe their circumstances.

**v. Marking of weight:** Each specimen needs to be placed on scales and accurately noted. Another staff member records that weight in the data collection sheet (or digital template if captured electronically) for the specimen in question, whilst someone else physically marks the weight in kg to the closest 100 grams (e.g., 3,2 as per the example above) on the specimen itself in indelible ink as the last numeric figure of the marking formula. With the determination of the weight and its marking on the specimen, the marking of each individual piece of stock is now complete. Finally, it is worth noting that in cases where ivory specimens were previously weighed, it is common that subsequent weights that derive from different scales may produce different weight results; in most cases, such discrepancies are not cause for concern, but major discrepancies should be investigated.

**vi. Taking measurements:** As an information requirement for the labels, other staff need to ascertain both the large external and the smaller inside curvature of each tusk, as well as the circumference at the

base using a flexible tape measure. This information also needs to be captured on the information sheets even if it is not part of the marking formula. (Finally, it is worth noting that, in the case of tusks mounted on a wooden plaque, the weight of the tusks cannot be taken, but the external and internal curvature measurements are possible, as is the circumference of the tusks; a photo should also be taken).

- vii. Checking the mass and quantity of the marked inventory:** Once all specimens have been weighed, the total weight of the inventory should be ascertained by adding together the weight of all individual specimens and expressing the result in kilograms (at +/- 100 grams). If data on the total quantity and weight of the stock in question was previously taken at source, it should be compared with the marking exercise data to ensure that nothing has substantially changed (noting the caution about weights given in v. above). The

quantity is evident by the total number of specimens that were marked. Any significant discrepancies need to be noted in the report covering the marking exercise.

- viii. Signing the data collection sheet and filing a report on the marking/labelling exercise:** Once all stocks have been marked and all tasks have been completed, the person responsible for the marking/labelling exercise, and perhaps others who participated as witnesses, should sign and date the data collection sheet and file it according to routine administrative procedures of the government agency in question. Where marking/labelling is done by other law enforcement agencies, copies of the data collection sheet and the report also need to be shared with MINFOF so that they are aware that new stocks of ivory have come into government position and future arrangement for their consolidation can be made as appropriate.

#### RECOMMENDATION

9. The manual data collection form (or digital template for electronic exercises) needs to be formally authorised and approved by the government as appropriate and distributed within MINFOF and to other LEAs as official documents for the purposes of capturing information for each specimen in an ivory inventory being marked and/or labelled. All procedures for marking and labelling should be described in an official government booklet for dissemination to all institutions and actors that may be involved in such exercises. The minimum capacity and resource needs for the required inventory procedures is to be relayed to MINFOF.

## 5.9 REGISTERING AND RECORDING OF SPECIMENS IN THE CENTRALISED DATABASE

After marking and labelling, the information concerning seized elephant ivory specimens needs to be formally registered and recorded in local registers and the centralised database, with the expectation that the physical specimens will eventually be moved to MINFOF's main ivory store for storage purposes. Because the centralised database is computerised, the process of registration will necessarily entail the use of electronic devices for capturing the information of each individual specimen in a digital template format for uploading into the database.

Like other processes, the registration is guided by Article 7 of Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014. Accordingly, registration consists of reporting

all marking references in both the centralised database and in decentralised manual registers that need to be kept by designated officials in each service concerned, including the Directorate of Wildlife and Protected Areas, the National Brigade for Forestry Control and Anti-poaching or Anti-Poaching Unit, the Regional Delegation, the Departmental Delegation and the institutional management of any storage room assigned for this purpose. Generally speaking, the current registers capture most of the information required for the marking and labelling exercises, however, not everything becomes part of the register. It is noted that 'the supervisor of the operation' and 'any particular observations' are not included, nor is there any provision for photographic evidence. In any event, the register is legally obligated to include

the following information:

- Number order;
- Date of seizure;
- Department responsible for data entry;
- Name of the agent responsible for the seizure;
- Name of the supervisor of the operations.
- Marking formula;
- Weight of the ivory;
- Length of the ivory;
- Type of ivory specifying whole, raw, worked, etc.;
- Reference report/other documents;
- Cause of mortality (natural, poaching, administrative killing, self-defence, unknown);
- Contextual source (seizure, confiscation/

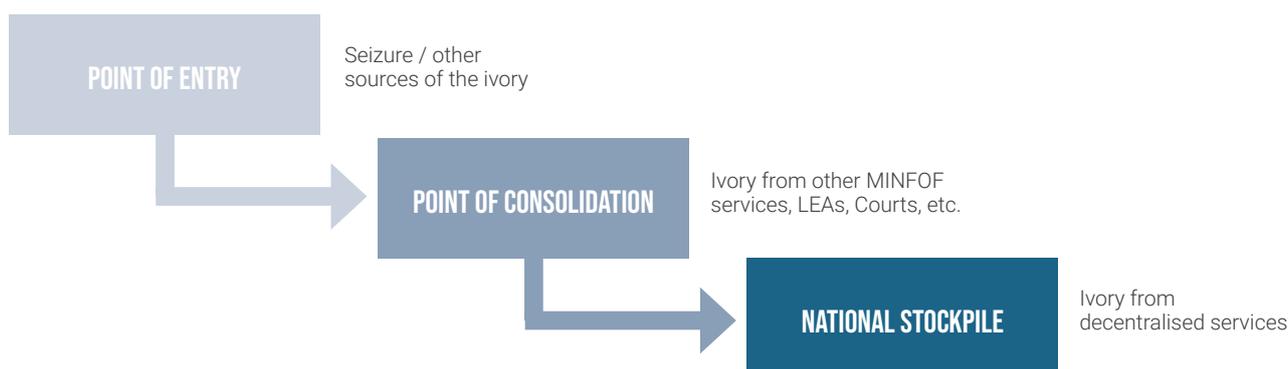
restitution, found, recovered in the field, unknown);

- Names of the offender;
- Additional information or observations.

To the extent possible, the registration should be at should be soon after ivory comes into the possession of government and enters the official chain of custody as shown in Figures 7 and 8 below. This enables transparency and traceability along the chain of custody. Where non-MINFOF actors are involved, consolidation of ivory stocks is often likely to take place at decentralised MINFOF locations before any eventual consolidation in the centralised storage facility.

**FIGURE 7**

*Registration of ivory and other specimens along the chain of custody.*

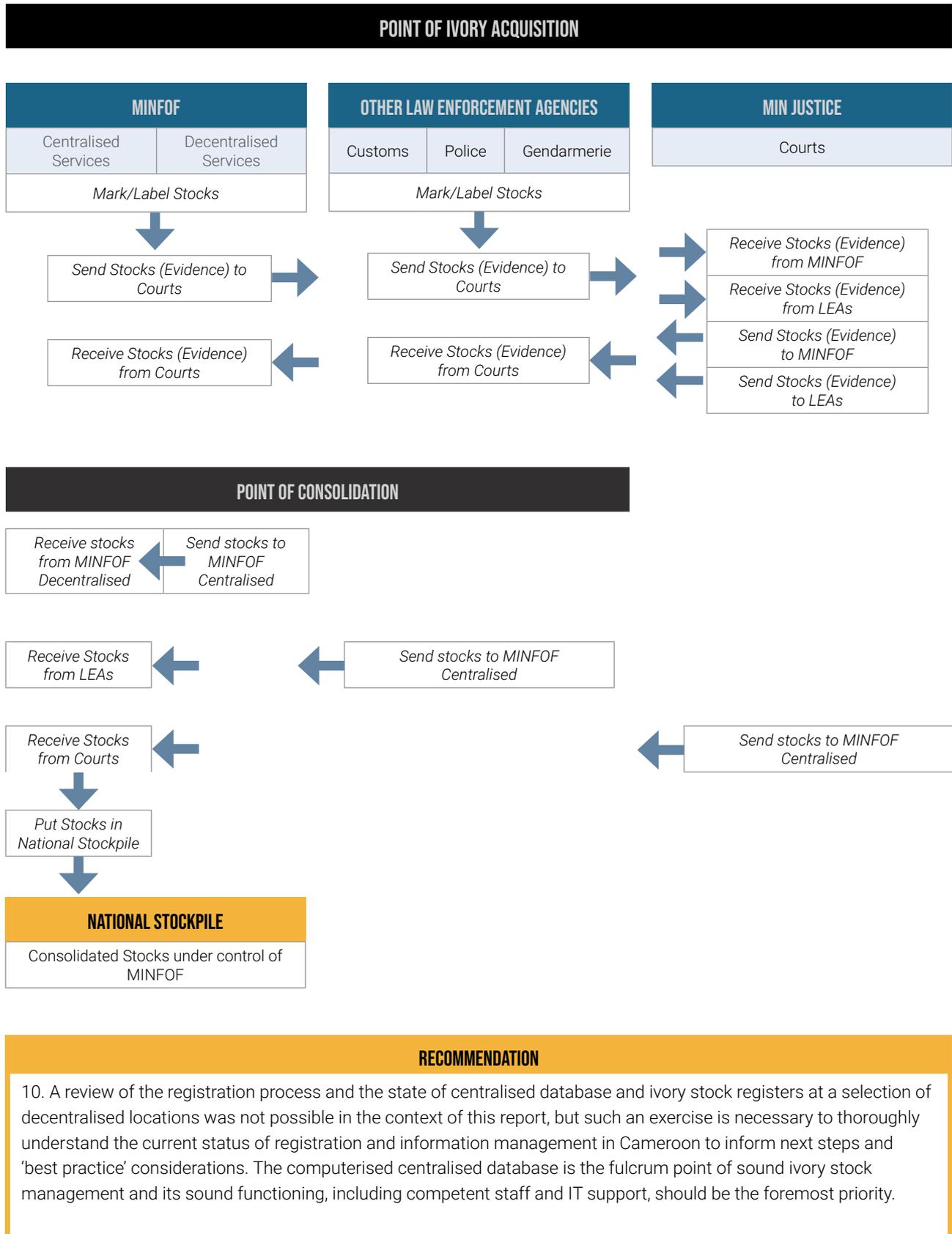


Registration and recording must be systematic and done using a register and online database. Both systems should be set up with the content of entries linked to the specifications of Article

7 of Decision 0003/ 2014. Allocations must be made for signatures of authorities depositing the ivory or taking it out at all stages.

FIGURE 8

Ivory management process along the chain of custody.





*A bullet hole through an elephant's tusk*

## 5.10 STOCKPILING AND SECURITY ISSUES

Article 8 of Decision 0003/2014 provides a detailed outline of the minimum-security features that all ivory storage rooms must meet in Cameroon. In this regard, all storage facilities must have an area greater than 100m<sup>2</sup>, be built of hard material, have no direct openings to the outside, and the ceiling must be in the form of a slab. Access must be through at least two metal doors that are equipped with two locks for which two separate staff members hold a set of keys. The interior shelves or cabinets should be constructed of hard material or wood. The ivory stocks need to be classified by category, then stored in containers and positioned on shelves or in cupboards with:

- 10 per container for ivory specimens weighing more than 4 kg;
- 20 per container for ivory specimens weighing 2 kg to less than 4 kg each; and
- 30 per container for ivory specimens whose weight of the tusk is less than 2 kg.

Article 9 of the Decision 0003/2014 also prescribes that ivory from all sources should be stored by MINFOF's territorially competent regional delegation, which must inform the central administration at least once a month of its status. The official transport of ivory stocks in the company of documentation allowing their movement to the central stockpile facility managed by the Director of Wildlife and Protected Areas should occur three times a year.

It is recognised that that any ivory stocks for which Court cases are ongoing can only be sent to central services once the judicial proceedings have concluded. However, in some cases, and as decided by the Court authorities, the ivory stocks in questions can be sent to MINFOF for storage and, in place of physical evidence, the case report, photographs, and video evidence of the seized ivory can be used to identify the evidence during Court proceedings.

In essence, as was the case for registering ivory and prescribed in Decision 0003/2014, MINFOF personnel should do the following at the central storage facility:

- Receive all incoming ivory stocks;
- Verify that it is accompanied by documents and reports, including pictures;
- Verify the weight, height, and other features of each specimen as marked and registered;
- Register the ivory in the centralised register at the national storage facility; and
- Store stocks in secure places as directed by the Decision.

Article 10 of the Decision 0003/2014 outlines the procedures governing the movement of seized ivory stored in secure premises. In this regard, any ivory taken out of the store for any reason whatsoever must be entered into a register of exits intended exclusively to note

the removal and return of all such stocks. The following information is recorded in the register:

- Information on the marking or labelling of the requested ivory;
- The name and rank of the officer who withdraws or returns the ivory against a receipt given by the officer in charge of this operation;
- The name and rank of the officer responsible for noting the exit or return of the ivory against a transmission slip, a copy of which is sent to the person in charge of the secure premises and the Department of Wildlife and Protected Areas;
- The date of the transaction and
- The references of the correspondence of the Minister in charge of Wildlife authorising the exit of the ivory, the reason for the removal and the duration of any such authorisation.

In Cameroon, most locations of MINFOF's

centralised and decentralised services lack adequate ivory storage facilities. The national central storage facility is located at the Mvog-Betsi Zoo in Yaounde but, owing to certain deficiencies, there have been discussions concerning the need to build a new fit-for-purpose structure [Personal Communication with a Senior MINFOF Official in Yaounde, April 2023]. At many of MINFOF decentralised premises, instances of various offices being used to store seized wildlife products, including elephant ivory, are frequently the rule and not the exception [Personal Communication with a Senior MINFOF Official in Bertoua – East Region, April 2023]. Standard shipping containers can make adequate ivory storage units (Milliken & Compton, 2019), but they are not widely used in Cameroon at the present time. However, one example is presented in Photo 2, although it is questionable whether it meets the guidelines established in Article 8 of Decision 0003/2014 because of the presence of windows, a single door and a roof which is not a concrete slab.

#### PHOTO 2

An example of a shipping container used for storage in Mbam & Djerem NP.



In Cameroon, although the remit of ivory stockpile management lies with MINFOF by law, on some occasions, MINFOF calls upon other LEAs, such as the Police or the Gendarmerie, to

provide security, especially during the transport of ivory stocks from one location to another.

## RECOMMENDATION

11. A systematic review of all ivory stock storage facilities in Cameroon should be undertaken to assess compliance with Decision 0003/2014 guidelines and, where sub-standard circumstances are found, ways to upgrade security should be identified. The legislation itself should be evaluated and revised if appropriate so that the use of cost-effective containers becomes an approved option.

### 5.11 INVENTORIES, AUDITS, AND REPORTING

An inventory is defined as a complete list of goods in stock. With reference to ivory stock management, an inventory can take various forms. It can refer to an all-encompassing item-by-item account of every ivory specimen held by the government regardless of physical location, or it could be limited to a particular ivory stock held at a specific location. An inventory could also refer to a more restricted sub-unit of ivory stocks, for example, those associated with a particular event like an ivory seizure, or a specific consignment of ivory transported from a field station to the central ivory store on a certain date. As such, the purpose at hand defines the scope of an inventory.

With the aid of a computerised centralised database, which holds data on each ivory specimen in the stockpile, including all information generated through the marking and labelling processes, it should be possible to electronically generate upon demand a comprehensive inventory account or, alternatively, any other kind of inventory as circumstances may warrant.

The generation of an inventory of a defined stock of ivory is also the first step for conducting an audit. Audits are important security mechanisms for independently verifying the status of previously marked and stored ivory stocks. Whilst total audits may examine the entire stockpile, more frequently auditing exercises involve a random sampling of specimens to verify that everything has been recorded accurately and essentially remain in an unaltered state; if the random sampling checks out, it is usually assumed that everything else is also satisfactory. On occasion, audits can reveal serious discrepancies which are indicative of theft, corruption, and other security lapses in stockpile management. Audits should be

undertaken whenever stocks are being moved between locations, destroyed, or otherwise disposed of so that there is a full accountable record concerning the status of the ivory stocks in question (Milliken & Compton, 2019). Finally, having periodic independent audits involving officials or individuals not directly engaged in ivory stock management can be an important security mechanism for ensuring security.

Inventories also form the basis for meeting reporting requirements either for internal purposes in Cameroon or externally to CITES. In terms of reporting requirements to CITES, Resolution Conf. 10.10 (Rev. CoP19), 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, and inform the Secretariat of the level of this stock each year before 28 February, inter alia to be made available to the programme Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses, 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.*

To support implementation of the ivory stock reporting requirements under the Convention, Notification No. 2023/004 of 10 January 2023 circulated a model table to use for the annual reporting government-held ivory stocks to the Secretariat (Tables 15).

TABLE 2

CITES model table for reporting and inventory of government held ivory.

| 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 <sup>5</sup> ) | 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  | Data        | Data   |                                   |

Source: Notification No. 2023/004 of 10 January 2023

In Cameroon, Article 11 of Decision 0003/2014 concerns information management around ivory stockpiles and details internal reporting requirements as follows:

1. An updated statement of the ivory stock must be sent quarterly to the Minister in charge of Wildlife by the local officer in charge of Wildlife. The compliance of ivory stocks will be subject to internal or external control/audit as necessary.
2. A database must be set up to record all information relating to these products.
3. Access, use or publication of the information contained in the database can only be done after formal authorisation from the Minister in charge of Wildlife.

Further, Article 12 of Decision 0003/2014 addresses issues of ivory leakage from government-held stocks. It states that "the disappearance of ivory specimens in a storage place exposes the culprits to legal proceedings and disciplinary sanctions provided for by the regulations in force". Thus, through this Decision, Cameroon ostensibly has had a centralised ivory stockpile database and an internal reporting system in place for nearly a decade.

Yet, in terms of CITES reporting, in a report to the 74th meeting of the Standing Committee in March 2022, the Secretariat reported on

the submission of ivory stockpile information by the Parties, indicating that Cameroon and two other Parties "have never declared ivory stockpiles [but] have nevertheless developed National Ivory Action Plans (NIAPS) which contain measures concerning stockpiles" (CITES, 2022a). Further, the report stated that "data from ETIS indicate that a number of Parties which have not submitted ivory stockpile declarations have reported making seizures of ivory during the period 2014 to 2019", a situation that applied to Cameroon and 40 other CITES Parties (CITES, 2022a). This indicates that, despite the legal imperatives of Decision 0003/2014, the status of Cameroon's ivory stockpiles have never been reported internationally to CITES.

Further, it is unclear if the ivory stockpile reporting requirements are even being implemented at the national level in Cameroon. In 2015, Cameroon officials estimated the weight of the national ivory stockpile to be more than 5,000 kg (Nkoke et al., 2017). Subsequently, on 19 April 2016, Cameroon reportedly incinerated 3,500 kg of elephant tusks and 1,753 art objects made of ivory that had been seized from traffickers over the years and centralised at the national stockpile facility in Yaoundé. The then Minister of MINFOF, Mr. Ngole Philip Ngwese stated that by ordering the destruction of the elephant

tusks, the President of the Republic, His Excellency President Paul Biya, sought to show Cameroon's commitment towards combatting poaching and illegal trafficking.

MINFOF asserted having carried out an internal audit of the stocks destroyed, however, there

were no independent observers involved as 'best practice' dictates (TRAFFIC, 2016). Further, as of February 2023, there is no comprehensive public information on the quantity of ivory in the national stockpile or at other facilities outside of Yaoundé.

## RECOMMENDATIONS

12. The efficacy of Cameroon's centralised database systems needs to be reviewed to assess compliance with Decision 0003/2014 requirements for internal and external reporting on the status of the country's ivory stockpiles.

13. Auditing protocols and 'best practice' procedures must be specified in appropriate regulations in order to ensure that they are periodically conducted, especially when ivory stocks are moved, destroyed or otherwise disposed of, as a mandated security feature in stockpile management.

## 5.12 OTHER RELEVANT ISSUES TO CONSIDER FOR INFORMATION MANAGEMENT AND OPERATIONAL EFFECTIVENESS

From the different systems, interviews, and field observations for this report, the following issues are proposed for consideration when developing Cameroon's NISMS with respect to future information management and operational effectiveness:

- **Manual ivory stock registers:**

Paper registers that allow the written recording of data and information pertaining to each ivory specimen in government custody are required at different stages of the ivory stock management process. In this regard, the following should govern the distribution of manual ivory stock registers:

- Each competent service of MINFOF, as well as all of the other LEAs that may acquire ivory, should have their own ivory stock registers in which all ivory specimens that are acquired for any reason or purpose are recorded at the point of entry into government custody;
- There is another register at the point of consolidation in an ivory storage facility at all MINFOF decentralised service locations in which any movements of ivory specimens into (for example, stocks are received from law enforcement actions, or from completed court cases, or other LEAs, etc.) or out of (for example, stocks are sent to the Courts as evidence in a law enforcement case, or to another storage facility for

consolidation, etc.) are formally tracked; and

- There is another ivory stock register at the centralised national stockpiling point in Yaounde in which all ivory stocks are recorded, as well as any subsequent movements or circumstances such as their disposal or loss.

All of these registers should be designed to include the information management needs as outlined in Article 7 of Decision 0003/2014 or any subsequent amendments.

- **Electronic data collection using an App:**

As indicated in this report, the Elephant Protection Initiative has developed an App that provides an adaptable, quick, and efficient way to digitally record information about each ivory specimen in an inventory. The stepwise approach essentially walks the users through what data needs to be collected at each point, including adding a photo of each specimen. Any App used in Cameroon will need to be adapted with reference to the information needs outlined in Articles 1, 2, 4, 5, 7 and 10 of Decision 0003/2014.

- The aim is for store managers to be able to digitally record data on ivory entering the stockpiling system on the day it arrives. Once new data has been entered into the app, the data is uploaded to the server using Wi-Fi or mobile data. This

allows real-time reserve stock data to be compiled on the server.

- **The server and online database:**

The EPI App directs the information collected for each specimen to an online database managed from a secure server. It is imperative for the server to be accessible online, and that the data remain confidential and the property of the Government of Cameroon.

The server should store all data in the cloud but be available to provide real-time summaries of ivory stocks as required, including comprehensive outputs of everything in the database or any subset (for example, by site, by weight, by type, by source, by particular seizure event, etc.) which can support and be used for a range of management needs or decisions. The database fields need to allow all data for each specimen to be viewed, as well as the photo. The centralised electronic database should contain all the entries found in the corresponding manual registers of all decentralised MINFOF locations and those stocks represented in the manual registers held by other LEAs.

The rules and regulations governing authorised access to the centralised computerised database will require thoughtful consideration to ensure security and confidentiality and must be formally and legally articulated in appropriate legislation. Custom login and passwords will be required for anyone given access to the server, and a log recording the date and time of every user that accesses the database must be captured, as well as any changes that are made to any records in the database.

Most authorised users will only have restricted access to specific datasets and be allowed to perform specific functions. For example, a field official might only be able to access data that relates to their decentralised service and only be allowed to view the data but never edit it, save it, or download it. On the other hand, the centralised stockpile data managers should be granted total access to all the data on the server, but with an inherent system of checks and balances so that nothing can be manipulated or obscured. In this regard, perhaps two or three administrators will play this role and manage the database, including the supervision of connection parameters, the verification of all users with access to the database and the precise functions they can perform, the tracking of periods of access, any changes to data fields, any outputs, etc. and the fulfilment of all reporting requirements.

- **Desktop computers:**

The use of desktop computers, like the paper registers, will be required for the operation and management of the centralised electronic database. Further, the use of computers might be a practical consideration for other points of entry or consolidation. Obviously, the use of computers must entail careful budgetary planning and support for recurrent expenditure needs.

The templates used for data capture of each record, if not linked directly to the main server, must be compatible in all respects. The use of computers in decentralised locations must accurately correspond to the fields agreed for the manual registers, and access for their use should only be granted to one or two designated officials for entering or tracking information.



*Elephant herds travel together and are led by a matriarch – an older female*

There is a caution concerning the long-term utility of laptop computers because they can be carried away easily.

- **The necessary human, logistical and financial means:**

Each of the relevant government institutions needs to designate staff committed to ivory stock management purposes, including those who will liaise with other actors involved in this process of managing elephant ivory stocks. Specialised competencies such as IT managers, security specialists or services will be required. Strong logistical support will also need to be deployed to support the effective operation of centralised computerised ivory stock management system. In particular, the following will need thoughtful consideration both in terms of financing and practical, cost effective, implementation:

- The design and management of the Application for general data collection;
- The design of the centralised database structure, its operational and security features and other functional specifications will require Sophisticated professional development;
- The online servicing of the database, troubleshooting and general IT support;
- The provision and long-term management of the Apps and associated hardware (such as tablets or cell phones) to carry out data collection

exercises of ivory stock inventories in the overall management system across the country;

- The design, periodic printing and distribution of manual ivory stock registers and data collection sheets;
- The recurrent budgetary concerns underpinning the frequent movements of ivory stocks to the Courts, or to consolidation and storage points, or repatriation of ivory seized abroad, etc.;
- The deployment of security features of the ivory storage facilities, including consideration of infrastructure investment to upgrade inadequate structures, and the personnel necessary for their operation.

A specific budget will be required for the effective functioning of this mechanism.

In general, the salaries of MINFOF officials are already covered by the Government of Cameroon, but other activities will require additional financial resources, such as the collection of ivory, trainings, audits, and inventories, and other services provided by specialists or experts. Additionally, equipment and materials for logistics, marking, registering etc., will need to be purchased, especially where the required items are not already at hand. It remains uncertain whether MINFOF will be unable to cover all the associated costs within the state budget.

## RECOMMENDATION

14. The planning requirements of the system should not be underestimated. A holistic gameplan addressing the full range of human, logistical and financial considerations of a national ivory stock management system needs to be developed to guide operational and financial requirements in a realistic manner, including recurrent expenditure.





*A travelling herd of African Elephants*

## 6: CONCLUSIONS AND RECOMMENDATIONS

Based on findings through the desk assessment of existing ivory stockpile management systems, including CITES Resolutions, Decisions, and Notifications; Cameroon Government's national legislative and regulatory frameworks, including the 1994 wildlife law and Decision 0003/2014 on stockpile management; an assessment of other accepted tools and mechanisms such as the guidance document developed by Milliken and Compton (2019) and EPI's mobile application-based digital register and management system for ivory; structured and semi-structured interviews with a cross-sectional mix of government officials, field observations at key locations, and the checklist from the CITES-approved guidance tools to assess the status of stockpile management

in Cameroon, this report puts forward the following conclusions:

- There is a pressing need to review, update and recommit to implementation of these legal mechanisms in order to transform their utility as concrete remedial actions addressing the full range of problematic issues linked to ivory trade crime, including development of a robust ivory stockpile management programme.

In terms of establishing the legal basis for stockpile management, the Government of Cameroon has put in place a number of legal instruments to address problems related to elephant conservation in general and ivory stockpile management

in particular, which afford some degree of basic alignment with most CITES commitments and obligations. The overarching measure is Law No. 94/01 of 20 January 1994 governing the management of forests, wildlife, fisheries, and its related Decrees. Other relevant legal instruments include Order No 0053/MINFOF of 1 April 2020, which designates Forest and Savannah Elephants as Class A protected species, corresponding to the CITES Annex I listing which prohibits commercial international trade; Prime Ministerial Order No 055/CAB/PM of 06 July 2015, which directs an Inter-Ministerial Committee to monitor and steer the implementation of Cameroon's NIAP that is an integral part of the CITES oversight process against illegal ivory trade; and -- most importantly from a NISMS perspective -- Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014, which outlines a series of rules and procedures for the marking and management of ivory stocks. Despite this legal framework, the evidence points to a continuous decline in Cameroon's elephant populations, indicating that these measures alone are insufficient to arrest the challenges at hand.

- Decision 003/2014 needs to be reviewed, updated and revitalised to guide future ivory stockpile management.

As the most specific regulation in terms of ivory stockpile management, MINFOF's Decision 0003/2014 is of primary importance. However, presently it is neither widely known nor adequately applied by most competent authorities. Even within MINFOF, some officials remain completely unaware of this Decision and do not implement its provisions that explicitly relate to the acquisition and management of ivory stocks. This situation becomes even more acute with other LEAs, such as the Customs, Police and Gendarmerie, whose primary area of competence is not wildlife conservation. The overall situation routinely leads, from the point of first acquisition through to consolidation in the centralised storage facility, to poor information management,

unaccountable and insecure storage and movement, and opaque reporting of ivory stocks at most levels in Cameroon.

- The persistent failure of reporting of seizures to ETIS and the status of the country's ivory stockpiles to CITES are two recurrent issues requiring dedicated focus to rectify.

Available evidence clearly shows that ivory seizures are not recorded and reported in a timely and systematic manner. This serious breach leads to delays in the recording, marking, registration and reporting of seized ivory, and is a contributing factor in ivory stock leakage back into illegal trade. In terms of international obligations under CITES, failure to report ivory seizures within the given annual timeframes to ETIS contributes to Cameroon's poor standing in successive analyses of illegal ivory trade. In this regard, the general lack of reporting from Cameroon fails to place instances of effective law enforcement in the country into the global monitoring system under CITES.

- The development of necessary tools, especially written SOPs, which adequately detail the requirements of each step of ivory stock management is paramount.

The main government institutions and officials charged with making ivory seizures and engaging in stockpile management have an accrued lack of capacity. Despite general knowledge about Cameroon's wildlife laws and regulatory frameworks, as evidenced from the questionnaire feedback, the information base specific to stockpile management remains extremely poor. Maintaining a fully accountable chain of custody for each ivory specimen, ensuring the security of stocks at all times, and addressing a range of information and physical management needs will require a concerted programme of ongoing training and communication encompassing all relevant government authorities.

- Channels and mechanisms such as AFRICA-TWIX that promote inter-agency communication and collaboration need to be strengthened by MINFOF or developed altogether to promote the kind of teamwork necessary for effective implementation.

Because ivory stock management necessarily includes a range of institutional players beyond the lead role of MINFOF, especially the involvement of Customs, the Police, the Gendarmerie, and the Ministry of Justice with respect to its Courts, strong collaboration and coordination is operationally imperative. However, the current situation for ivory stock management is characterised by insufficient teamwork and partnerships between MINFOF and the other LEAs. Problems of confusion concerning roles, responsibilities, processes, and procedures currently proliferate, and conflicts of competencies are commonplace.

- Problems related to good governance were also observed. Whilst this report does not address corruption issues in a comprehensive and detailed manner, it is nonetheless clear that reported cases of ivory stock leakage have occurred on occasion. Some of the root causes that serve to facilitate such instances involve situations where ivory stocks remain unmarked and unaccounted for in terms of information management at the point of acquisition, storage or movement along the trade chain. Development of comprehensive SOPs and their diligent implementation by all actors should help improve security and prevent corruption.
- If budgetary considerations of stockpile management are ignored, ongoing system failure will be the likely outcome.

The lack of financial and material resources is a major stumbling block for effective stockpile management system. Currently, there is no clear allocation of funding for NIAP implementation and stockpile management in the national budget. Without resources, even the best

intentions of the Cameroon Government will be thwarted and that includes ivory stockpile management as a component of the country's NIAP. At its core, stockpile management involves performing a variety of time-consuming tasks on a recurrent basis, such as marking, registering, moving, consolidating, and reporting ivory stocks. Investment in equipment to do these tasks is required, such as the procurement of weighing scales, computers, tablets, or smart phones for registering and information management, and various stationary needs like manual template forms, labels and marking devices, all constitute necessary purchases. Finally, certain infrastructure investment may also be required such as building or remodelling fit-for-purpose storage facilities with adequate security features, having vehicles at hand for transport, backstopping the integrity of the centralised database system with computer equipment, software and IT support, and other legitimate needs.

- It is imperative that ivory stockpile management is supported by a broad-based training programme that addresses the key roles and responsibilities of each institution and the rollout of detailed SOPs to ensure that their application is well-understood and systematically implemented.

As was learned from feedback during the questionnaire component of this report, many LE officers reported benefitting from knowledge gained at TRAFFIC-organised training workshops on a variety of topics. Though such events are not frequent enough, there is an ever-ready, eager audience within government for training on the impact of wildlife crime, legislation, and regulatory mechanisms, including CITES, and law enforcement and administrative processes from investigations and court case management.

To address identified gaps and to realise effective, traceable, and secure ivory stockpile

management in Cameroon, the following recommendations are proposed:

### **FOR THE ATTENTION OF THE PRIME MINISTRY, THERE IS A NEED:**

- To further enable the effective and sustained implementation of Cameroon's NIAP and support the proper functioning of the NIAP Committee created through Order No 055/CAB/PM of 06 July 2015 by clearly articulating funding for these activities in the national budget.
- To ensure that all government institutions in Cameroon recognise the paramount authority of MINFOF for the purposes of ivory stock management and endeavour to communicate and direct any specimens of ivory that they acquire for any reason to the competent MINFOF decentralised or centralised authority at the appropriate moment.
- To coordinate actions with MINFOF and other Ministries (especially the Ministry of Finance), the CITES Secretariat, the Donor community and partner NGOs, by identifying financial resources that could support Cameroon's ivory stock management activities, such as the African Elephant Fund (adopted by CITES as mechanism to fund elephant conservation activities), the Global Environment Facility, the Congo Basin Forest Partnership (CBFP), the African Development Bank, and the Tri-National Dja-Odzala-Minkébé (TRIDOM) programme.

### **FOR THE ATTENTION OF THE MINFOF, THERE IS NEED:**

- To endorse the proposed robust ivory stockpile management system, especially the adoption and use of Standard Operating Procedures (SOPs) so that all agencies (MINFOF, Police, Gendarmerie, Customs, Courts) take common approaches to routine stockpile management functions to enhance security and transparency of ivory stocks and their long-term storage and information management.
- To review, update, and amend, as appropriate, Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014, in recognition of CITES recommendations and 'best practice' considerations in CITES-approved ivory stockpile management guidelines, and other problematic issues noted in this report, including:
  - a reassessment of definitions and codes concerning sources of ivory and ivory types;
  - reconsideration of the prescribed marking and labelling systems for ivory specimens;
  - re-evaluation of the stock registration system as a formal means of capturing all data and information of ivory specimens in MINFOF's centralised database system;
  - re-examination of the centralised database system to ensure that its management, hardware, and software needs are adequately addressed and sufficient to fulfil the key function of holding and tracking the status of all ivory specimens in the country; and
  - ensuring that all manual and electronic templates for capturing inventory and registration data, conducting audits and other functions, are standardised and designed to capture the full scope of required information and have been formally agreed by government.
- To ensure that all ivory stocks within Cameroon's national territory, including specimens at the level of the courts (both finished and unfinished cases), are systematically marked, inventoried, and registered in the centralised database of ivory stocks;

- To transport all ivory stocks, for which court judgements have been made and all judicial proceedings have ended, to the national ivory stockpile facility in Yaounde, ensuring their security during transport and in accordance with the relevant Articles of Decision 0003/2014.
- To ensure that, as required by law, the marked ivory stocks of an ivory crime event must accompany offence reports and be presented during court procedures as evidence to avoid procedural missteps and poor court decisions and outcomes.
- To review the conditions and security features at all ivory storage facilities used by MINFOF and other LEAs, including the Courts, ensuring that minimum security and accountability measures as recommended in the legal framework of Decision 0003/2014 are in place and being implemented.
- To review the implementation and performance of internal ivory stock reporting and auditing at all levels and assess compliance with the requirements of Decision 0003/2014, including whether quarterly statements on the status of ivory stocks held by decentralised services are being sent to the Minister in charge of Wildlife, and whether any stocks have ever been subjected to annual audits or any other internal or external control/audit as necessary.
- To review and assess annual reporting of Cameroon's ivory stockpiles to CITES and ensure that future reporting occurs in a timely and regular manner as prescribed by Resolution Conf. 10.10 (Rev. CoP19) and relevant Notifications to the Parties, including engagement and coordinated actions with other LEAs and partner NGOs so that complete information and data for stockpile reporting purposes is at hand.
- To improve reporting of ivory seizure cases to ETIS by ensuring that data collections forms are filled out during the initial acquisition of ivory from seizure events, including actions by other LEAs, and directed to centralised MINFOF services that has a designated ETIS Focal Point and recently registered with the CITES ETIS Online reporting facility which accommodates the electronic reporting of seizure data at any time.
- To develop and implement a comprehensive awareness raising and capacity building programme directed at field staff of MINFOF and other LEAs on general conservation strategies, wildlife trade crime, effective law enforcement processes, the management of seized wildlife products, especially elephant ivory, and implementation of the SOPs for ivory stock management, with a particular focus on promoting the full range of ivory stock management requirements, particularly any amendments, as proposed above, to Decision 0003/2014.
- To pursue the development of channels and mechanisms for accentuating institutional cooperation, collaboration, and coordination between MINFOF and other LEAs on issues pertaining to wildlife resources in accordance with existing legal frameworks, such as the NIAP Steering Committee, Anti-poaching Units and any special Accords of Cooperation, to facilitate better communication, information sharing and SOPs implementation for ivory stock management.
- To review and identify pathways of corruption that have led to ivory stock losses following their acquisition by government and, where appropriate, put measures in place to make the ivory stockpile management system corruption-resistant all along the chain of custody, ensuring that periodic checks, such as regular and systematic reporting, audits, use of electronic data, and collaboration with other State Institutions such as the Anti-Corruption Commission and the Audit Bench of the Supreme Court, are in place and being implemented.
- To ensure that the full range of human, logistical, and financial considerations of a national ivory stock management system are recognised and accommodated, the

planning process for the system should entail the comprehensive development of a holistic gameplan that addresses all operational and financial needs in a realistic manner, including consideration of recurrent expenditure beyond the initial investment.

- To coordinate actions with the Donor community and NGOs to acquire finances

to enable the provision of needed materials, equipment, and logistical support, and continue to build and strengthen collaboration with IGOs and NGOs to support activities geared at getting financial and material resources, building the capacity of MINFOF and the other LEAs.

## **FOR THE ATTENTION OF PARTNERS:**

- To continue to provide support for the implementation of Cameroon's NIAP and the implementation of a national ivory stockpile management system and other MINFOF requirements to CITES, such as annual reporting on the status of the ivory stockpile and the reporting of ivory seizure cases to ETIS.
- To provide other resources such as tools to build capacity, finance, and material for a better appropriation, applicability and

operationalisation of the ivory stockpile management system.

- To share available funding opportunities and support MINFOF in requesting funding through clear and targeted project proposals addressing the problems linked to wildlife crime, especially threats to elephants and ivory stockpile management.

# REFERENCES

## LEGISLATIONS AND REGULATORY FRAMEWORKS

- The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) – Resolutions, Decisions and Notifications.
- Law No. 94/01 of 20 January 1994, establishing the regime of forests, wildlife, and fisheries.
- Law No. 2005/007 of 27 July 2005, establishing the Criminal Procedure Code.
- Decree N° 95/466/PM of 20 July 1995, setting the terms of application of the 1994 Wildlife Law.
- Decree No. 2001/181 of 25 July 2001, organizing the National Gendarmerie.
- Decree No. 2005/099 of 06 April 2005, organizing the Ministry of Forestry and Wildlife.
- Decree No. 2012/540 of 19 November 2012, organizing the General Delegation for National Security.
- Prime Ministerial Order No 055/CAB/PM of 06 July 2015, creating the Inter-Ministerial Committee charged with monitoring and implementing the Cameroon NIAP.
- MINFOF Order No. 0648/MINFOF of 18 December 2006, defining animals into protection classes A, B, and C.
- MINFOF Order No 0053/MINFOF of 01 April 2020 of the Ministry of Forestry and Wildlife, reviewing Order No. 0648/MINFOF defining animals into classes A, B, and C.
- MINFOF Decision 0003/D/MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014, outlining the rules and procedures for the marking and management of ivory stocks.

## PUBLICATIONS

- African Elephant Database (2023). Website of the IUCN Species Survival Commission's African Elephant Specialist Group. Viewed 06 May 2023. [https://africanelephantdatabase.org/report/2013/Africa/Central\\_Africa/Cameroon](https://africanelephantdatabase.org/report/2013/Africa/Central_Africa/Cameroon).
- African Union (2015). African Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa, May 2015. [https://au.int/sites/default/files/documents/33796-doc-african\\_strategy\\_strategy\\_africaine\\_au.pdf](https://au.int/sites/default/files/documents/33796-doc-african_strategy_strategy_africaine_au.pdf).
- Baker, B., Jacobs, R., Mann, M., Espinoza, E. and Grein, G. (2020). *CITES Identification Guide for Ivory and Ivory Substitutes* (4th Edition, Allan, C. (ed.)), World Wildlife Fund Inc., Washington DC. Commissioned by CITES Secretariat, Geneva, Switzerland.
- Blanc, J.J., Barnes, R.F.W., Craig, G.C., Dublin, H.T., Thouless, C.R., Douglas-Hamilton, I. and Hart, J.A. (2007). *African Elephant Status Report 2007 – An Update from the African Elephant Database*. Occasional Paper of the IUCN Species Survival Commission No. 33. IUCN, Gland, Switzerland.
- Bussi re, E.M.S., and Potgieter, D. (2023) KAZA Elephant Survey 2022, Volume I: Results and Technical Report, KAZA TFCA Secretariat, Kasane, Botswana.
- Cameroon Government (2015). *National Ivory Action Plan (NIAP) of Cameroon (Revised)*. Submitted by Secretariat General, Department of Wildlife and Protected Areas, Ministry of Forestry and Wildlife to the CITES Secretariat, April 2015. <https://cites.org/sites/default/files/common/prog/niaps/E-CAMEROON-NIAPRev-Jun2015.pdf>.
- CITES (2010). *African Elephant Action Plan*. CoP15 Inf. 68, CITES Secretariat, Geneva, Switzerland.
- CITES (2013). *Report on Monitoring the Illegal Killing of Elephants (MIKE) to the 16th meeting of the Conference of the Parties*. CoP16. Doc. 53.1, CITES Secretariat, Geneva, Switzerland. 15pp.
- CITES (2016a). *Report on Monitoring the Illegal Killing of Elephants (MIKE) to the 17th meeting of the Conference of the Parties*. CoP17 Doc. 57.5, CITES Secretariat, Geneva, Switzerland. 18pp.
- CITES (2016b). *Report on Monitoring the Illegal Killing of Elephants (MIKE) to the 17th meeting of the Conference of the Parties*. CoP17 Doc. 57.5 Addendum, CITES Secretariat, Geneva, Switzerland. 3pp.
- CITES (2018). *Implementing Aspects of Decisions 17.171 to 17.172 on Stocks and Stockpiles (Elephant Ivory)*, Doc. 49.2 to 70th meeting of the Standing Committee. CITES Secretariat, Geneva, Switzerland. <https://cites.org/sites/default/files/eng/com/sc/70/E-SC70-49-02.pdf>.
- CITES (2019). *Report on Monitoring the Illegal Killing of Elephants (MIKE) to the 18th meeting of the Conference of the Parties to CITES*. CoP18 Doc. 54.2, CITES Secretariat, Geneva, Switzerland. 20 pp.
- CITES (2022a). *Exemptions and special trade provisions Stocks and stockpiles (elephant ivory)*. Doc. 61.2 to 74th meeting of the Standing Committee. CITES Secretariat, Geneva, Switzerland.
- CITES (2022b). *Report on the Elephant Trade Information System (ETIS)*. CoP19 Doc. 66.6. CITES Secretariat, Geneva, Switzerland.
- CITES (2023a). *Practical guidance for the management of ivory stockpiles, including their disposal*. CITES website viewed 13 May 2023. [https://cites.org/sites/default/files/eng/prog/elephant/E-Guidance\\_mgt\\_ivorystockpiles.pdf](https://cites.org/sites/default/files/eng/prog/elephant/E-Guidance_mgt_ivorystockpiles.pdf).
- CITES (2023b). *Elephant ivory stocks: marking, inventories and security*. Notification to the Parties, No. 2023/004 of 10 January 2023. CITES Secretariat, Geneva, Switzerland. <https://cites.org/sites/default/files/notifications/E-Notif-2023-004.pdf>.
- CITES (2023c). *Monitoring the illegal trade in ivory and other elephant specimens*. Notification to the Parties, No. 2023/023 of 03 March 2023. CITES Secretariat, Geneva, Switzerland. <https://cites.org/sites/default/files/notifications/E-Notif-2023-023.pdf>.
- Chase MJ, Schlossberg S, Griffin CR, Bouch  PJC, Djene SW, Elkan PW, Ferreira S, Grossman F, Kohi EM, Landen K, Omondi P, Peltier A, Selier SAJ and Sutcliffe R. (2016). *Continent-wide survey reveals massive decline in African savannah elephants*. Peer J 4:e2354. <https://doi.org/10.7717/peerj.2354>.
- COMIFAC. (1999). *Sommet Des Chefs D'Etat D'Afrique Centrale Sur La Conservation Et La Gestion Durable Des For ts Tropicales*, Declaration De Yaounde, 17 Mars 1999. [https://pfb-cbfp.org/files/docs/key\\_docs/COMIFAC/declarationyaounde.pdf](https://pfb-cbfp.org/files/docs/key_docs/COMIFAC/declarationyaounde.pdf).
- DeLancey, M. W. and M.D. DeLancey. (2000). *Historical Dictionary of the Republic of Cameroon* (3rd Ed.). The Scarecrow Press, Lanham, Maryland, United States.
- Douglas-Hamilton, I. (1979). *African Elephant Trade Study, Final Report*. Laebra 1979/005. University of Oxford, United Kingdom.

- EIA (2018a). *Exposing The Hydra: The Growing Role of Vietnamese Syndicates in Ivory Trafficking*. Environmental Investigation Agency, London, United Kingdom. 13 pp.
- EIA (2018b). *Taking Stock: An assessment of progress under the National Ivory Action Plan process*. Environmental Investigation Agency, London, United Kingdom.
- EIA (2020). *Out of Africa: How West and Central Africa have become the epicentre of ivory and pangolin scale trafficking to Asia*. Environmental Investigation Agency, London, United Kingdom.
- EPI (2017). *Ivory Inventory Protocol for Planning and Conducting Ivory Inventories Version 1.4*. Elephant Protection Initiative document prepared July 2017. London, United Kingdom. [https://www.elephantprotectioninitiative.org/files/ugd/f42bce\\_29c930ba42ee4fd696501afe874078d2.pdf](https://www.elephantprotectioninitiative.org/files/ugd/f42bce_29c930ba42ee4fd696501afe874078d2.pdf).
- EPI (2019a). *Tools to Support the Management and Inventorying of Ivory Stockpiles*. Powerpoint presentation of July 2019. Elephant Protection Initiative, London, United Kingdom. [https://cites.org/sites/default/files/Stockpile/201907\\_SMS%20presentation\\_CITES%20website\\_EN.pdf](https://cites.org/sites/default/files/Stockpile/201907_SMS%20presentation_CITES%20website_EN.pdf).
- EPI (2019b). *Best Practices and Gold Standards for the Management of Ivory (and other wildlife products)*. Powerpoint presentation of July 2019. Elephant Protection Initiative, London, United Kingdom. [https://cites.org/sites/default/files/Stockpile/201907\\_Gold%20Standards%20Presentation%20FINAL.pdf](https://cites.org/sites/default/files/Stockpile/201907_Gold%20Standards%20Presentation%20FINAL.pdf).
- EPI (2019c). *Gold Standards for the Management of Ivory & Other Wildlife Products*. Document prepared July 2019, Elephant Protection Initiative, London, United Kingdom. 69 pp. [https://www.elephantprotectioninitiative.org/files/ugd/f42bce\\_4024a3dcffea4837ace17a7de85eaba7.pdf](https://www.elephantprotectioninitiative.org/files/ugd/f42bce_4024a3dcffea4837ace17a7de85eaba7.pdf).
- EPI (2021). *Stockpile Management System (SMS) Briefing Note*. Elephant Protection Initiative, London, United Kingdom. [https://www.elephantprotectioninitiative.org/files/ugd/f42bce\\_bb02e7463e4e45a1abaa13dcee7a3247.pdf](https://www.elephantprotectioninitiative.org/files/ugd/f42bce_bb02e7463e4e45a1abaa13dcee7a3247.pdf).
- Feldhamer, G., L.C. Drickamer, S.H. Vessey and J.F. Merritt. (1999). *Mammalogy: Adaptation, Diversity, and Ecology*. McGraw-Hill Higher Education. Dubuque, Iowa, United States.
- Gobush, K.S., Edwards, C.T.T, Balfour, D., Wittemyer, G., Maisels, F. and Taylor, R.D. (2022). *Loxodonta africana* (amended version of 2021 assessment). The IUCN Red List of Threatened Species 2022: e.T181008073A223031019. IUCN, Gland, Switzerland. <https://dx.doi.org/10.2305/IUCN.UK.2022-2.RLTS.T181008073A223031019.en>.
- Gobush, K.S., Edwards, C.T.T, Maisels, F., Wittemyer, G., Balfour, D. and Taylor, R.D. (2021). *Loxodonta cyclotis* (errata version published in 2021). *The IUCN Red List of Threatened Species 2021*: e.T181007989A204404464. IUCN, Gland, Switzerland. <https://dx.doi.org/10.2305/IUCN.UK.2021-1.RLTS.T181007989A204404464.en>.
- Hakin, J. (2011). *Transnational Crime in the Developing World*. Global Initiative Against Transnational Organised Crime. Geneva, Switzerland. <https://globalinitiative.net/analysis/transnational-crime-in-the-developing-world/>.
- Hudgens, J. and Trillo, R. (2003). *The Rough Guide to West Africa*. Rough Guides, London, United Kingdom.
- INTERPOL. (2022). *Stepping up the global fight against wildlife crime through a united response*. 4 October 2022 (viewed on 19 September 2023). <https://www.interpol.int/en/News-and-Events/News/2022/Stepping-up-the-global-fight-against-wildlife-crime-through-a-united-response>.
- Johnson, M. (1978). *By Ship or by Camel: The Struggle for the Cameroons Ivory Trade in the Nineteenth Century*. (J. of Afr. Hist. 19 (4) 539-549).
- LAGA (2013). *Annual Report January – December 2013*. The Last Great Ape Organisation, LAGA, Yaounde, Cameroon. [http://www.laga-enforcement.org/Portals/0/Documents/Activity%20reports%202013/LAGA\\_Annual\\_Report%202013.pdf](http://www.laga-enforcement.org/Portals/0/Documents/Activity%20reports%202013/LAGA_Annual_Report%202013.pdf).
- LAGA (2020). *LAGA Wildlife Law Enforcement, Annual Report January – December 2020*. The Last Great Ape Organisation, LAGA, Yaounde, Cameroon. <https://www.laga-enforcement.org/en/annual-report-2020-R>.
- Lawson, K. and Vines, A. (2014). *Global Impacts of the Illegal Wildlife Trade: The Costs of Crime, Insecurity and Institutional Erosion*. Chatham House, London, United Kingdom.
- Kindzeka, M. E. (2019). *Cameroon Busts Ivory, Pangolin Traffickers*. Voice of America News, 20 March 2019. <https://www.voanews.com/a/cameroon-busts-ivory-pangolin-traffickers/4839359.html>.
- Maisels F, Strindberg S, Blake S, Wittemyer G, Hart J, Williamson EA, et al. (2013). *Devastating Decline of Forest Elephants in Central Africa*. PLoS ONE 8(3): e59469. <https://doi.org/10.1371/journal.pone.0059469>.
- Mashini, M.C. and Nkoke, S.C. (2020). *Les Stocks d'Ivoire d'Elephant de la République Démocratique du Congo: Quel Système de Gestion Mettre en Place?* TRAFFIC International. Yaoundé, Cameroun.
- Milliken, T. and Compton, J. (2019). *Ensuring Effective Stockpile Management: A Guidance Document*. [https://cites.org/sites/default/files/eng/prog/elephant/Stock\\_management\\_guidance.pdf](https://cites.org/sites/default/files/eng/prog/elephant/Stock_management_guidance.pdf)
- Milliken, T., Burn, R.W., Underwood, F.M. and Sangalakula, L. (2013). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: a report to the 16th meeting of the Conference of the Parties*. CoP16 Doc. 53.2.2 (Rev. 1), CITES Secretariat, Geneva, Switzerland. 30 pp
- Milliken, T., Underwood, F.M., Burn, R.W. and Sangalakula, L. (2016a). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 17th meeting of the Conference of the Parties*. CoP17 Doc. 57.6 (Rev. 1) Annex, CITES Secretariat, Geneva, Switzerland. 29 pp.
- Milliken, T., Underwood, F.M., Burn, R.W. and Sangalakula, L. (2016b). *Addendum to the Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 17th meeting of the Conference of the Parties to CITES*. CoP17 Doc. 57.6 (Rev. 1) Addendum, CITES Secretariat, Geneva, Switzerland. 5 pp.
- Milner-Guilland, E.J. and Beddington, J.R. (1993). *The Exploitation of Elephants for the Ivory Trade: A Historical Perspective*. Biological Sciences, Vol. 252, No. 1333, pp. 29-37.
- Ngandjui, G. and Ringuet, S. (2010). *MANUEL ETIS: Le programme ETIS de suivi du commerce illégal de l'ivoire et autres produits de l'éléphant d'Afrique Loxodonta africana comme outil de protection de l'éléphant au Cameroun*. TRAFFIC Central Africa, Yaounde, Cameroon.
- N'goran, K.P. (2017). *WWF Biomonitoring Activities from 2014 to 2016 - Status of Forest Elephant and Great Apes in Central Africa Priority Sites*. WWF Report 2017. Yaounde, Cameroon.
- Nkoke, S.C. (2012). *Cameroon's Wildlife – Endangered Animal Species*. Anucam Books. Buea, Cameroon.

- Nkoke, S.C. Ngeh, C. P. and Ahlers, N. (2016). *Workshop Proceedings: Sub-Regional Action Planning to Strengthen Regional Collaboration. Support of the Implementation of National Ivory Action Plans (NIAPs) in Central Africa*. 30 pp. TRAFFIC Central Africa, Yaoundé, Cameroon.
- Nkoke, S.C., Nya, F.A., and Ononino A.B. (2016). *Guide to Wildlife Law Enforcement, Cameroon: Competences, Attributions, Duties, and Responsibilities of the Different Bodies*. TRAFFIC, Yaoundé, Cameroon and Cambridge, United Kingdom.
- Nkoke, S.C. Lagrot J.F. Ringuet, S. and Milliken, T. (2017). *Ivory Markets in Central Africa – Market Surveys in Cameroon, Central African Republic, Congo, Democratic Republic of the Congo and Gabon: 2007, 2009, 2014/2015*. TRAFFIC. Yaounde, Cameroon and Cambridge, United Kingdom.
- Nowak, R. (1999). *Walker's Mammals of the World*. Baltimore, Maryland: The John Hopkins University Press, United States.
- Okello, J.B.A., Wittemyer, G., Rasmussen, H. B., Arctander, P., Nyakaana, S., Douglas-Hamilton, I. and Siegismund, H.R. (2008). *Effective population size dynamics reveal impacts of historic climatic events and recent anthropogenic pressure in African Elephants*. Blackwell Publishing Ltd, Oxford, United Kingdom.
- Permata, I.M. and Wahyuni, E. (2020). *Behind the Ivory Trade Shutdown in China*. Journal of International Wildlife Law and Policy, Volume 23, 2020, pp 151 – 165.
- Reed Business Information (1986). *New Scientist*. Reed Business Information. pp. 49 in [http://en.wikipedia.org/wiki/Ivory\\_trade](http://en.wikipedia.org/wiki/Ivory_trade).
- Ringuet, S. (2012). *Audit des stocks gouvernementaux d'ivoire au Gabon. Rapport d'étape : 26 mars – 6 avril 2012*. TRAFFIC Central Africa, Yaounde, Cameroon.
- Ringuet, S. and Lagrot, J. F. (2013). *Développement d'un Système de Gestion des Stocks d'Ivoire au Gabon: Propositions de Standards Minimums*. Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Geneva, Switzerland.
- Rochon, N. (2013). *Rising International Ivory Trade Threatens the African Elephant*. <http://www.theinternational.org/articles/365-rising-international-ivory-trade-threat>
- Steenkamp, G. (2003). *Oral biology and disorders of tusked mammals*. Vet. Clin. Exot. Anim. 6, 689-725.
- Straziuso, J., Casey, M. and Foreman, W. (2010). *Ivory Trade Threatens African Elephant*. NBCNews.com, June 2010, United States.
- Thornton, A., and Currey, D. (1991). *To Save an Elephant*. Doubleday, New York, United States.
- Thouless, C.R., Dublin, H.T., Blanc, J.J., Skinner, D.P., Daniel, T.E., Taylor, R.D., Maisels, F., Frederick, H.L. and Bouche, P. (2016). *African Elephant Status Report 2016: An update of the African Elephant Database*. Occasional Paper No. 60, IUCN/SSC, Gland, Switzerland.
- TRAFFIC (2020). *Record Elephant Ivory Seizure of 628 kg in Cameroon*, Wildlife Trade News , 26 October 2020. TRAFFIC International, Cambridge, United Kingdom.
- TRAFFIC (2022). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 19th meeting of the Conference of the Parties to CITES, CoP19 Doc. 66.6 Annex 1*. Geneva, Switzerland. <https://cites.org/sites/default/files/documents/COP/19/agenda/E-CoP19-66-06.pdf>.
- UNEP (2013). *Elephants in the Dust – The African Elephant Crisis. A Rapid Response Assessment*. United Nations Environment Programme, GRID-Arendal, Nairobi, Kenya.
- U.S. Department of Justice (2023). *Environmental Crimes section: Wildlife Trafficking*. Official website of the United States Government, consulted on 4 April 2023. Washington D.C., United States. <https://www.justice.gov/enrd/wildlife-trafficking>.
- Van Kooten, G.C. (2005). *Elephant Economics in the Rough: Modelling Ivory Trade*. Department of Economics, University of Victoria, Canada.
- Vira, V. and Ewing, T. (2014). *Ivory's Curse: The Militarization & Professionalization of Poaching in Africa*. C4ADS, Washington D.C., United States.
- Wildlife Justice Commission. (2021). *Bringing Down the Dragon: An analysis of China's largest ivory smuggling case*. Wildlife Justice Commission, The Hague, Netherlands. 7 pp.
- Wilson, D.E. and Reeder, D.M. (2005). *Mammal Species of the World*. Johns Hopkins University Press, Baltimore, Maryland, United States.
- WWF (2015). *WWF Court Case Tracking System* (Consulted in April 2023). WWF-Cameroon, Yaounde, Cameroon.
- WWF (2023). About WWF and Cameroon. Website viewed on 25 February 2023. WWF-Cameroon, Yaounde, Cameroon. [https://cameroon.panda.org/about\\_us/](https://cameroon.panda.org/about_us/).

## WEBSITES

<https://www.justice.gov/enrd/wildlife-trafficking>. Attorney General Jeff Sessions, Statement on Behalf of the United States at the London Illegal Wildlife Trade Conference, October 11, 2018. Consulted on -04 April 2023.

# ENDNOTES

<sup>1</sup> Created in 2005 by agreement between the Cameroon, Gabon, and Congo Governments, the TRIDOM is a cross-border conservation landscape covering an area of 191,541 km<sup>2</sup>, representing 7.5% of the total area of tropical forests in the Congo Basin of Central Africa. The TRIDOM landscape is considered to have ecological and biodiversity uniqueness and hosts the most important population of forest elephants in the world. It encompasses 10 protected areas, five of which are in Cameroon, including the Dja Biosphere Reserve, Nki, Boumba Bek and Lobeke National Parks; and Ngoyla Wildlife Reserve.

<sup>2</sup> The (Wildlife TRAPS) Project is an initiative (2014-2020) designed to transform the level of co-operation between the international community of stakeholders who are impacted by illegal wildlife trade between Africa and Asia. The project is designed to increase understanding of the true nature and scale of required responses, to set priorities and identify intervention points, and to test non-traditional approaches to solutions with project partners.

<sup>3</sup> The Elephant Protection Initiative Foundation was formed as the EPI Secretariat to supersede the Organisation known as Stop Ivory. All Stop Ivory assets and staff were transferred to the EPI Foundation in November 2019 and all Stop Ivory products have subsequently been rebranded as products of the EPI Foundation.

<sup>4</sup> Of further note, it can be observed that, below the main serial number, there is another date showing 01/03/2023 (day/month/year), which was given as the original date of the seizure, however, it was incorrectly rendered. The real date of seizure was 17/02/2019, which was later written above the tusk code in indelible black ink as a correction.

<sup>5</sup> Problem Animal Control.

# IMAGE CREDITS

|              |  |
|--------------|--|
| Cover        | Johanneke Kroesbergen Kamps / Unsplash |
| Inside cover | WWF / Mike Goldwater                   |
| 5            | Andrew Rice / Unsplash                 |
| 9            | Elizabeth John / TRAFFIC               |
| 11-12        | TRAFFIC                                |
| 18           | World Agroforestry                     |
| 27           | WWF / Folke Wulf                       |
| 40           | WWF-Canon / WWF CARPO / Peter Ngea     |
| 50           | Pawan Sharma / Unsplash                |
| 63           | Sone Nkoke                             |
| 69           | TRAFFIC                                |
| 70           | Sone Nkoke                             |

# APPENDICES

## APPENDIX 1: QUESTIONNAIRE FOR STRUCTURED INTERVIEWS

### NIAP TRIDOM CAMEROON – DEVELOPMENT OF A NISMS

#### I - INTRODUCTION

Dear Respondent, thank you for taking the time to respond to these questions. Your answers and suggestions will help TRAFFIC Central Africa Office (CAF) and the NIAP TRIDOM Cameroon to develop a robust National Ivory Stockpile Management System (NISMS).

#### II - PROFILE OF THE RESPONDENT

Name and surname:

Workplace/location:

Gender:

Number of years in service:

Official position:

Date:

Service/Administration:

#### III - QUESTIONS

- 1 – What is your role in wildlife law enforcement/justice and other wildlife conservation process?
- 2 – Do you have any knowledge about the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)? Yes / No. If Yes, please tell us more about it.
- 3 – Do you have any knowledge about the Cameroon Wildlife Legislation and other regulatory frameworks? Yes / No. If Yes, please tell us more about it.
- 4 – Do you have any knowledge about the Elephant Trade Information System (ETIS) of CITES? Yes / No. If Yes, please tell us more about it.
- 5 – Are you aware of the Government of Cameroon's Decision 0003/D/ MINFOF/SG/DFAP/SDVEF/SC of 07 January 2014, which outlines the rules and procedures for the marking and management of ivory stocks? Yes / No. If Yes, please tell us more about it.
- 6 – Are you aware of any other legal or administrative procedure in the management of seized wildlife specimens (live species or products)? Yes / No. If Yes, please tell us more about it.
- 7 – Do you have the ability to identify wild animal species/products such as elephant ivory, pangolin scales, feline skins, etc. ? Yes / No. If Yes, please tell us more about it.
- 8 – In the course of your work, have you ever participated in a seizure of wildlife specimens (live species or products)? Yes / No. If Yes, please tell us more about it.
- 9 – In the course of your work, have you ever participated in a seizure of elephant products? Yes / No. If Yes, please tick the type of product(s).

|                                       |  |
|---------------------------------------|--|
| <input type="checkbox"/> Raw ivory    | <input type="checkbox"/> Other raw products, e.g. tail, foot |
| <input type="checkbox"/> Worked ivory | <input type="checkbox"/> Other worked products, e.g. belt    |
- 10 – Can you tell us how you managed the seized elephant ivory?
- 11 – In the course of your work, have you collaborated with another Agency / Institution? Yes / No. If Yes, which Agency/Institution and how?
- 12 – In the course of your work, what are the four (4) major challenges you face in managing seized elephant ivory?
  - i)
  - ii)
  - iii)
  - iv)
- 13 – What would you suggest to improve the management of seized elephant ivory?
- 14 – Is there anything else you would like to tell us about your work and the management of seized elephant specimens and other wildlife products?

**THANK YOU FOR YOUR PARTICIPATION IN OUR SURVEY. YOUR INPUT WILL HELP US TO UNDERSTAND THE ACTUAL MANAGEMENT OF IVORY STOCKPILES AND TO PUT IN PLACE A ROBUST NISMS**

## APPENDIX 2: DECISION 0003/2014

### DECISION N° 0003/D/MINFOR/SG/DFAP/SDVEF/SC 07 JANUARY 2014 FIXING THE RULES AND PROCEDURES FOR MARKING, LABELLING, REGISTRATION AND STORAGE OF ADMINISTRATIVE IVORY

#### THE MINISTER OF FORESTRY AND WILDLIFE

Considering the Constitution;

Considering Law N° 94/01 of January 20, 1994, on Forests, Wildlife and Fisheries;

Considering Decree N° 95/466/PM of July 20, 1995, setting the terms of application of the Wildlife Law;

Mindful of Decree N° 2005/099 of April 6, 2005, on the Organisation of the Ministry of Forestry and Wildlife; amended and supplemented by Decree N° 200S/49 5 of December 31, 2005;

Considering Decree N° 2011/408 of December 9, 2011, on the Organisation of the Government;

Mindful of Decree N° 2011/410 of December 9, 2011, on the formation of the Government;

Considering Order N° 0050/A/MINEF/DFAP of September 22, 2004, regulating the trade and processing of ivory in Cameroon;

Considering Order N° 648/MINFOR of 18 December 2006 establishing the list of animals in protection classes A, B and C;

Considering Order N° 0883/A/MINEF/DFAP/GEM of October 24, 2001, on standards for marking elephant tusks;

Considering Resolutions Conf. 5.11 and 13.66;

Mindful of CITES Resolution conf 10.10 (Rev Cop16);

Considering Decisions 12.36 to 12.39 of the CITES Secretariat;

Considering Circular letter N° 0328/LC/MINFOR/SG/DFAP of 30 May 2011 relating to the implementation of the elephant trade information system (ETIS);

#### DECIDES

##### Article 1:

This Decision lays down the rules and procedures for marking, labelling, recording and storing ivory from seizures made during anti-poaching operations (LAB), administrative culling (BA), or taken from the carcasses of elephants that died of natural causes (MN) or seals from ongoing litigation (SC). These ivories are held and controlled by the administration in charge of wildlife. They are the property of the Cameroonian State.

##### Article 2:

The categories of ivory are: Raw ivory, Semi-worked ivory, Worked ivory, Fresh ivory and Old ivory:

- (1) **Raw ivory (RI)** means whole elephant tusks still in the raw state, polished or unpolished, and any cut ivory, polished or unpolished and whose original shape has been altered in any way. Raw ivory includes tusks broken or cut into pieces but not otherwise shaped or processed;
- (2) **Semi-worked ivory (SWI)** represents ivory already to some degree shaped or treated, for example: a block of ivory shaped into the shape of a blank personal seal, the object is not yet a finished product;
- (3) **Worked ivory (WI)** is ivory carved, shaped or transformed, either wholly or partially, and does not include whole tusks in any form unless all of the ivory has been carved;
- (4) **Fresh ivory (FI)** is ivory from recent poaching or recent natural death; it bears traces of blood or flesh particles; it does not show discolouration or cracks due to age; the edges of the tusk are sometimes sharp (and not blunt) where it was detached from the animal;
- (5) **Old ivory (OI)** is ivory that has been in storage for a very long time; it is fragile and is characterised by a weathered, discoloured and cracked appearance; includes old ivory, ivory that has been in storage for more than 10 years or pre-convention ivory (Resolution 13.6 and 5.11);

##### Article 3:

- (1) Within the meaning of this Decision, the carving of ivory is an artistic activity which consists in designing and producing on ivory, forms in volume, in relief, or in the round (statue), in high relief, in low relief, by modelling, by direct carving, by welding or assembly.
- (2) Administrative ivory represents all the categories referred to in Article 2 above.

#### **Article 4:**

Whole ivories of any size and cut pieces of ivory which have both a length of 20 cm or more and a weight of one kilogram or more are marked with piercing, in indelible ink or by another means of marking, using the following formula: **CMR XX 00/13-X/CA/OR/14** where these numbers and letters represent:

- CMR: The acronym CMR, which designates the acronym of Cameroon;
- XX: Code of the region representing the administrative acronym (for example, the North--NO region);
- 00: The serial number of the marking;
- 13: The two digits of the year of the marking (ex. Year 2013);
- X: The serial number for the year in question;
- CA: represents the ivory category (RI or SWI or WI or FI or OI);
- OR: corresponds to the origin as stipulated in article 1 (LAB, BA, MN and SC);
- The last two digits represent the weight of the marked item in kg (e.g., 14kg).

#### **Article 5:**

The labelling procedure relates to the information to be presented on the labels which are placed on the trophies; they must indicate: the region, the department, the locality where the seizure was made, the date of your seizure, the origin of the product, the category of the ivory, the serial number of the marking, the person in charge who carried out the seizure, the measurements of the ivory (length and weight), the supervisor of the operation, the particular observations.

#### **Article 6:**

Any seizure of ivory or elephant products will be subject to systematic completion of an ETIS form to be transmitted to the Minister in charge of wildlife within 90 days of the events, separately from the transmission of the seized ivory products.

#### **Article 7:**

Registration consists of reporting all marking references in a register kept by a designated official in each service concerned: Directorate of Wildlife and Protected Areas, National Brigade for Forestry Control and Anti-poaching / Anti-Poaching Unit, the Regional Delegation, the Departmental Delegation and the storage room assigned for this purpose. This register includes the following information:

- Number order;
- Date of seizure;
- Department responsible for data entry;
- Name of the agent responsible for the seizure;
- Marking formula;
- Weight of the ivory;
- Length of the ivory;
- Category of ivory specifying: whole, heap, worked, etc.;
- Reference report/minutes;
- Cause of mortality (natural, poaching, administrative beating, self-defence, unknown);
- Contextual source (seizure, confiscation/restitution, found, recovered in the field, unknown);
- Names of the offender.

#### **Article 8:**

The ivory storage room must meet minimum security conditions in this case: have an area greater than 100m<sup>2</sup>, be built of hard material, with no direct opening to the outside; access must be through at least two metal doors equipped with two locks for which two people have a set of keys, the ceiling in the form of a slab and the shelves/cabinets in hard or wood.

The ivories are classified by category, then stored in containers and positioned on shelves/cupboards:

- 10 per container for ivories weighing more than 4 kg;
- 20 per container for ivories weighing 2 kg to less than 4 kg each;
- 30 per container for ivories whose weight of the tusk is less than 2 kg.

#### **Article 9:**

The seized ivories are stored by the territorially competent regional delegation, which must seize the central administration at least once a month and transport the ivories by official slip and official means of transport 3 times a year to a secure premises managed by the Director of Wildlife and Protected Areas. The ivories for which cases are still ongoing can only be sent to the central services once the cases have been closed.

**Article 10:**

The procedures governing the movement of seized ivory stored in the secure premises obey the following rules: any ivory taken out of the store for any reason whatsoever must be entered in a register of exits intended exclusively to note the exits and the returns. The following information is recorded in the register:

- information on the marking or label of the requested ivory;
- the name and rank of the officer who withdraws or returns the ivory against a receipt given by the officer in charge of this operation;
- the name and rank of the officer responsible for noting the exit or return of the ivory against a transmission slip, a copy of which is sent to the person in charge of the secure premises and to the Department of Wildlife and Protected Areas;
- the date of the transaction;
- the references of the correspondence of the Minister in charge of Wildlife authorising the exit of the ivory, the reason and the authorised duration.

**Article 11:**

(1) An updated statement of the ivory stock must be sent quarterly to the Minister in charge of Wildlife by the local officer in charge of Wildlife. The compliance of ivory stocks will be subject to internal or external control/audit as necessary.

(2) A database must be set up to record all information relating to these products.

(3) Access, use or publication of the information contained in the database can only be done after formal authorisation from the Minister in charge of Wildlife.

**Article 12:**

The disappearance of ivory specimens in a storage place exposes the culprits to legal proceedings and disciplinary sanctions provided for by the regulations in force.

**Article 13:**

This Decision will be recorded and communicated wherever necessary.

## APPENDIX 3: STANDARD ELEPHANT PRODUCT SEIZURE DATA COLLECTION FORM

Access the [Ivory and Elephant Product Seizure Data Collection Form online](#).



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



*Please fill in one form for each individual seizure, or for the results of each court case.  
Completed forms should be returned to the address below*

### Ivory and elephant product seizure data collection form

Is this the first time this seizure is being reported? Yes  No   
Is this a follow-up report to an earlier submission? Yes  No

1. **Source of data** \_\_\_\_\_  
**Date of information:** Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_
2. **Date of seizure:** Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
**Agency responsible for seizure** \_\_\_\_\_
3. **Type of activity** (please tick): Export  Import  Transit  Possession   
Sale  Offer for sale  Illegal killing  Other \_\_\_\_\_
4. **Location of discovery:** Place \_\_\_\_\_  
City \_\_\_\_\_ Country \_\_\_\_\_
5. **Country of origin** \_\_\_\_\_
6. **Country of export/re-export** \_\_\_\_\_
7. **Country of destination/import** \_\_\_\_\_
8. **Elephant species:** African  Asian  Unknown
9. **Ivory type and quantity:**  
Raw ivory: Number of tusks/pieces \_\_\_\_\_ Weight (kg) \_\_\_\_\_  
Semi-worked ivory: Number of pieces \_\_\_\_\_ Weight (kg) \_\_\_\_\_  
Worked ivory: Number of pieces \_\_\_\_\_ Weight (kg) \_\_\_\_\_  
Percentage (%) representing: Old \_\_\_\_\_ Fresh \_\_\_\_\_ Unknown \_\_\_\_\_  
Comment \_\_\_\_\_
10. **Non-ivory elephant products:**  
Elephant hide/skin: Number of pieces \_\_\_\_\_ Weight (kg) \_\_\_\_\_  
Manufactured elephant hide product: \_\_\_\_\_ Type of product \_\_\_\_\_  
Weight (kg) \_\_\_\_\_ Feet (No.) \_\_\_\_\_ Hair (kg) \_\_\_\_\_  
Other (please specify) \_\_\_\_\_
11. **Other contraband seized with elephant products** \_\_\_\_\_  
\_\_\_\_\_
12. **Estimated value of seized elephant products in country of seizure** \_\_\_\_\_  
\_\_\_\_\_
13. **Mode of transport:** Air  Sea  Land   
Other \_\_\_\_\_

14. **Method of concealment/fraud** \_\_\_\_\_  
\_\_\_\_\_

15. **Documentation:** None  Falsified  Fake Permit   
Valid permit but wrong shipment  Other \_\_\_\_\_

16. **Method of detection** (please tick): Routine inspection  Targeting  Investigation   
X-ray  Intelligence  Other \_\_\_\_\_

17. **Profile of offenders/suspects:**  
Name \_\_\_\_\_  
(Individual or company) Alias(es) \_\_\_\_\_  
Address(es) \_\_\_\_\_

Tel/Fax Nos \_\_\_\_\_  
Nationality \_\_\_\_\_ Passport/ID Nos \_\_\_\_\_  
Date of birth: Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
Sex (please tick): Male  Female  Unknown

18. **Status of offenders/suspects** (please tick): Hunter  Middleman Trader   
Importer  Carver/manufacturer  Wholesaler  Retail seller  Exporter   
Tourist/Consumer  Courier  Handling agent  Other \_\_\_\_\_  
Repeat offender (please tick): Yes  No  Unknown   
Other information \_\_\_\_\_

19. **Status of the case in court** \_\_\_\_\_  
a) Date case introduced in court: Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
b) Date case closed in court: Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
c) Name of court: \_\_\_\_\_  
d) Verdict / Penalty (please tick): Not guilty  Guilty   
Seizure maintained  Return of goods  Prison  (months) \_\_\_\_\_  
Fine  (value) \_\_\_\_\_ Other \_\_\_\_\_

20. **Additional information** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

21. **Was an Ecomessage form filed with Interpol?** (please tick) Yes  No  Unknown   
\_\_\_\_\_

**Name and position of person completing this form** \_\_\_\_\_

**Name of organization represented** \_\_\_\_\_  
Date \_\_\_\_\_

*For CITES Secretariat use only*

**SDFC reference code:** \_\_\_\_\_  
**Date received by CITES Secretariat:** Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
**Date passed to TRAFFIC:** Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
**Date entered in database:** Day \_\_\_\_\_ Month \_\_\_\_\_ Year \_\_\_\_\_  
**Data quality rating:** ( ) 1 ( ) 2 ( ) 3 ( ) 4

## APPENDIX 4: EXPLANATORY NOTES FOR THE IVORY AND ELEPHANT PRODUCT SEIZURE DATA COLLECTION FORM

Access the [Explanatory notes for the Ivory and Elephant Product Seizure Data Collection Form online](#).

### Explanatory notes for the *Ivory and elephant product seizure data collection form*

#### Background

Annex 1 to Resolution Conf. 10.10 (Rev. CoP17) directs all Parties to "provide information on seizures and confiscations of ivory or other elephant specimens on the prescribed form to the Secretariat within 90 days of their occurrence". This document serves to explain more fully the requirements for each of the prescribed items on the data collection form.

The objective of the *Ivory and elephant product data collection form* is to collect data and information on seizures and confiscations of ivory and other elephant specimens in a systematic manner. The data will be held as a component of the Elephant Trade Information System (ETIS) in order to monitor and record levels of illegal trade in ivory and other elephant products on a global basis.

The form should be filled out clearly either in capital letters, typing on the form or by adopting your own electronic version. The tick boxes should be filled out with a tick i.e. .

Please note that persons filling out the data collection forms are free to omit confidential information. To safeguard confidentiality and data integrity, all completed forms should be sent to the CITES Secretariat where they will be screened before being passed to TRAFFIC for inclusion in the database.

Also please note that to qualify for data entry, questions 1, 2 and 4 must be filled in, on each form, as this is the minimal essential information required for each seizure. Questions 9 and/or 10 are also very important and either the weight or quantity should be filled in, but preferably both. If you are unable to obtain some of the required information, incomplete forms can be submitted, and more information can be sent later, if necessary.

To the extent possible, please try to obtain the following information:

With regard to the two introductory questions, indicate whether this is the first time the seizure is being reported or if it is a follow-up report to an earlier submission by ticking "Yes or No". When submitting further information on cases that have already reported to ETIS, please make it clear as to which seizure the follow-up report relates to.

#### 1. Source of data

Give the source of the information. Preferably, the source should be the original source of information (e.g. the government agency responsible for the seizure). However, the source could be a newspaper report, government press release, or other published item. If so, indicate as appropriate. Provide the date the information was obtained or acquired in the following format: day/month/year. If the exact date is not known, at the very least, indicate the year and the source of data. Any seizure information received without the year and source will be of little use to the system for analytical purposes.

#### 2. Date of seizure

Give the date the seizure actually occurred and indicate the agency responsible for the seizure. If the exact date is not known, at the very least, indicate the year of seizure. Any seizure information received without the year of seizure will be of little use to the system for analytical purposes.

#### 3. Type of activity

Identify the nature of the transaction. Specify if the trade offence involved illegal export, import, transit, possession, sale, offer for sale/purchase, or illegal killing. If "other", please indicate more specifically. This is a multiple-choice question and more than one answer is permitted.

#### 4. Location of discovery

Identify the place, city and country in which the seizure took place. Examples of “place” are an international airport, a ship in a port, a hotel, border post, game reserve, etc. It may not always be possible to describe the place or city, but at the very least indicate the country. Any seizure information received without the country of discovery will be of little use to the system for analytical purposes.

#### 5. Country of origin

Preferably identify the country of origin of the elephant products seized, but if that proves to be difficult indicate the region (e.g. West Africa or Africa) in which the ivory or elephant product is believed to have originated. If completely unknown, write “unknown.”

#### 6. Country of export/re-export

If the seized items involved an international transaction then this section should be filled in. Identify the country of export or re-export. In cases involving illegal possession or sale within a particular country, particularly an elephant range state, there may not be a country of export. If not known, write “unknown.”

#### 7. Country of destination/import

If the seized items involved an international transaction then this section should be filled in. Identify the country to which the ivory or elephant product was destined. If not known, write “unknown.”

#### 8. Elephant species

If known, identify the elephant species from which the ivory or elephant product derived (i.e. African elephant or Asian elephant). If not known, check “unknown.”

#### 9. Ivory type and quantity

Identify the ivory type and quantity, by indicating the total number of items seized and their total weight. Use the following definition of terms as a guide:

**Raw ivory** – refers to whole tusks which remain in a raw state or whole tusks which may derive from sport hunting or other activities, including those that are mounted or polished. In addition to whole tusks, raw ivory includes tusks that have been broken or cut into pieces, but otherwise have not been shaped or processed. Indicate number of tusks/pieces by crossing out the one that does not apply.

**Semi-worked ivory** – refers to ivory that has been shaped or processed to some extent but which will undergo further processing at a later stage. Examples would include ivory blocks that have been fashioned into name seal blanks, but are not yet fashioned products.

**Worked ivory** – refers to carved or manufactured ivory items that are finished products. Examples would include jewelry and accessories (e.g. bangles, rings, necklaces, hair clips, etc.), piano keys, chopsticks, game pieces (e.g. chess sets, mah jong pieces, billiard balls, etc.), carvings, composite sculptures, and other finished products.

If known, please indicate the percentage of the seized ivory that represents “fresh” or “old” ivory. If unknown, indicate “unknown”.

Please use the following definition of terms as a guide:

**Fresh ivory** – refers to ivory that is deemed to have been recently poached. Such ivory typically has blood or particles of flesh attached to it, does not show evidence of discolouration or cracks from aging, and sometimes exhibits sharp (as opposed to worn or blunt) edges on the lip cavity end of the tusk when it was removed from the animal using an axe, machete or other sharp chopping tool.

**Old ivory** – refers to ivory that is deemed to have been held in storage for a considerable amount of time, typically exhibiting a weathered appearance with discolouration, cracks and brittleness as noticeable features.

### **Comment**

Give a brief description of the item seized (e.g. whole tusk, ring, chopsticks, ivory blocks, etc.) or any details concerning distinctive markings on the surface of the products, such as punch dyed or written numbers or codes. If the space allocated on the form is insufficient, use the back of the form or additional sheets of paper which should be attached.

### **10. Non-ivory elephant products**

Identify non-ivory elephant products seized and indicate the volume. Please note:

**Elephant/hide skin** – note the number of skins/hides in their raw state and the total weight of all pieces seized.

**Manufactured hide product** – indicate the type or types of product and the total weight of the products seized.

**Feet** – indicate the number of feet seized.

**Hair** – indicate the total weight of hair or hair products seized.

**Other** – please describe any other type of product seized and the total volume of the product or products.

### **11. Other contraband seized elephant products**

Provide details of any other items seized along with the elephant products (e.g. drugs, diamonds, parrots, weapons, etc.) If possible, indicate the total volume of the other contraband seized.

### **12. Estimated value of seized elephant products in country of seizure**

Indicate an estimated value in local currency of the seized elephant products in the country of seizure. Be sure to state the currency in full (e.g. US dollars, Hong Kong dollars, Zimbabwe dollars, etc.) Note the source or basis for the valuation (e.g. an airway bill, or verbal declaration, etc.).

### **13. Mode of transport**

Identify the mode of transport (e.g. airline, ship, truck, post, etc.) used to move the seized elephant products. If by air, sea or by land, try to provide further details on the airline carrier, the ship, or the vehicle and/or the name of the courier company (e.g. DHL, Chronopost, Fedex, etc.) If by post, try to identify the post office from which the parcel originated.

### **14. Method of concealment/fraud**

Describe the manner in which the elephant products were concealed to avoid detection. Illustrative examples include semi-worked ivory blocks shipped by post disguised with brown paint, ivory tusks identified as “beeswax” or “wood curios” on the documents, worked ivory curios hidden in carry-on baggage, or caches of raw ivory tusks which were buried.

### **15. Documentation**

Indicate whether any kind of documentation accompanied the seized items. Examples of such documentation could be CITES import and export permits, internal transaction permits, transport licenses, possession certificates, etc.

Please use the following definition of terms as a guide:

**Falsified** – a genuine permit that has been illegally altered to represent the items that have been seized.

**Fake permit** – a forged or counterfeit document.

**Valid permit but wrong shipment** – a genuine permit meant for a different consignment.

#### 16. Method of detection

This refers to the way by which the seizure came about by the authority responsible. Five main methods of detection are noted here with an option to add any other method. A box can be ticked more than once.

Please use the following definition of terms as a guide:

**Routine inspection** – this is the method which relates to the normal activity of checking for contraband; in such cases this is when inspection is performed in a neutral way without any prior information.

**Targeting** – when a seizure has occurred as a result of profiling activities of individuals, trade routes, typical locations of illicit activity etc. targeting must relate to prior intelligence analysis for wildlife only and not other contraband.

**Investigation** – the method of investigating particular illegal activity relating to wildlife, where information has led to proactive research into an illicit activity.

**X-ray** – where a x-ray machine has been used to detect the contraband.

**Intelligence** – the use of prior information to assist in the detection.

#### 17. Profile of offenders/suspects

Provide information concerning any individual named, apprehended, arrested, or tried in conjunction with the seizure. Space is allocated for one individual, if more than one person is involved, please write on the back of the form or attach an additional sheet of paper with the profiles. Even if some of this information may be deemed confidential, at the very least, please indicate the nationality of the offenders/suspects for analytical purposes. Other information will be held by the CITES Secretariat and will not become part of the ETIS analysis process apart from the nationality of the offenders/suspects.

#### 18. Status of offenders/suspects

Provide the status of the offenders/suspects with respect to the seizure by ticking the appropriate box or identifying another item not listed. This is a multiple-choice question and more than one answer is permitted.

Please note:

**Courier** – refers to a person who actively smuggles contraband or accompanies contraband from one point to another in its route from source to destination. This does not refer to commercial freight courier companies.

**Repeat offender** – refers to a person who been caught/arrested with a similar crime on at least one other occasion and maybe even repeatedly.

#### 19. Status of case in court

Provide information on the status of the case in the courts in particular the following:

- a) The date the case was first brought to court.
- b) The date the cases ended, if still pending, indicate by writing "pending" on the line that states **Status of the case in court**.
- c) The name and location (city/town) of the court.

The verdict/penalty, describe the verdict and any penalties given in the case by ticking the appropriate box.

**20. Additional information**

Provide any other information that you feel is relevant and important to the case. If the space allocated on the form is insufficient, use the back of the form or additional sheets.

**21. Was an Ecomessage form filed with Interpol?**

Indicate whether the seizure was reported to Interpol using the Ecomessage form. The Ecomessage form was circulated to the Parties through CITES Notification to the Parties No. 966 of 7 March 1997. Interpol's Ecomessage is a system for collection and dissemination of intelligence data on environmental crime, including the illegal trade in wildlife. The Ecomessage form can be obtained from the CITES Secretariat.

**Name and position of person completing this form**

Please indicate your name and position as well as the department in which you work within your organization.

**Name of organization represented**

Indicate the name of the organization that you are representing.

## APPENDIX 5: ENSURING EFFECTIVE STOCKPILE MANAGEMENT: A GUIDANCE DOCUMENT BY TOM MILLIKEN AND JAMES COMPTON (2019)

### Annex 3: How to Conduct a Stock Inventory

#### **Purpose:**

As a reoccurring first step in stock management, the purpose of a stock inventory in the context of a broader stock management programme is to identify, mark and register all stocks within a country in order to produce and maintain a consolidated record of every item in the stockpile at any particular point in time. As such, a completed stock inventory should be recognized as an official government document cataloguing a valuable state asset and have certifiable status as a legal record in a court of law. Stock inventories should serve to:

- **promote compliance with national and international legal requirements**, including reporting to the CITES Secretariat on the status of specified stockpiles (i.e. elephant ivory, rhinoceros horn and pangolin scales) by 28 February in each calendar year;
- **support effective law enforcement against wildlife trade crime**, including safeguarding evidence in the prosecution of criminal cases, conducting forensic examination, and preventing corruption and stock leakage back into illegal markets;
- **reinforce wildlife management through the generation of valuable information** on species and their origin, metamorphic data on the specimens that is useful in population modelling and other research, and other issues that could benefit decision making for conservation and management purposes.

Accordingly, those with official responsibilities for stockpile management should be legally accountable for ensuring that all stocks remain secure, with the execution of periodic audits with reference to contemporary data. The most recent consolidated species-specific stock inventory should serve as the official and complete record of a country's stockpile's status for reporting or other purposes whenever required.

#### **Conducting a stock inventory:**

Basic considerations—An ongoing process of periodic stock inventories is the essential basis of a country's stock management programme. The first time a comprehensive stock inventory for the species in question is undertaken establishes the baseline account of a country's stockpile. Thereafter, subsequent inventories should either add newly acquired stocks as appropriate, or subtract any stocks which have subsequently been destroyed, removed, stolen or otherwise lost as items in the stockpile. In this regard, stock inventories proceed on an iterative basis that ideally unfold according to a standardised process in terms of the information collected, the marking of specimens and the capture of each stock record in electronic or manual formats.

Alignment with CITES requirements—Stock inventories need to be conducted in such a manner that they serve to implement CITES requirements on a range of fronts as outlined in Resolution Conf. 10.10 (Rev. CoP17) (*Trade in elephant specimens*) (see Annex 2). For example, for elephants, the section entitled *Regarding marking*, the Resolution:

*2. 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 colour;*

Further, in the section 'Regarding trade in elephant specimens', the Resolution addresses the need for ivory stock management and regular reporting to the CITES Secretariat by calling upon governments to:

*c) introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the movement of ivory within the State, particularly by means of:*

*i) compulsory trade controls over raw ivory; and*

*ii) comprehensive and demonstrably effective stock inventory, reporting, and enforcement systems for worked ivory;*

and

*e) maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory, and inform the Secretariat of the level of this stock each year before 28 February, inter alia to be made available to the programme Monitoring the Illegal Killing of Elephants (MIKE) and the Elephant Trade Information System (ETIS) for their analyses, 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;*

Concerning forensics, in the section entitled 'Regarding the traceability of elephant specimens in trade', the Resolution:

*22. URGES Parties to collect samples from large-scale ivory seizures (i.e. a seizure of 500 kg or more) that take place in their territories, preferably within 90 days of the seizure or as soon as allowed under judicial processes, and provide these to forensic and other research institutions capable of reliably determining the origin or age of the ivory samples in support of investigations and prosecutions;*

An iterative process of regular ivory stock inventories should buttress a country's ability to satisfy all CITES requirements noted above so that a contemporary updated record is available at least on an annual basis.

**Initial planning**—Depending on the location and status of stocks, a stock inventory may be achieved in a one-off exercise at a single site, or it could involve a repetition of multiple exercises in many disparate places which all hold stocks. Before commencement, a detailed planning exercise is necessary to identify all authorities or institutions which presently hold unregistered stocks and should participate in the stock inventory exercise. In countries where the authority for stock management has been legally assigned in national legislation, the designated agency should be sufficiently empowered to conduct inventories and take possession of all relevant stocks for storage purposes as a straightforward administrative imperative rooted in law. Where authority for stock management is unclear or is a shared responsibility between a number of different government

agencies, some kind of inclusive process involving all stakeholders needs to occur so that stock management at the national level can proceed in an integrated manner capable of delivering an inventory that encompasses all stock holdings found throughout the entire country.

Development of a stock inventory workplan and budget—Stock inventories should proceed on the basis of an agreed workplan and budget. For budgetary, logistical and administrative purposes, the planning process needs to determine which government agencies hold relevant stocks of the species in question, the estimated number of pieces in these stockpiles, where the stocks are located and, if relevant, where the stocks will be moved for future consolidation. For a first-time inventory exercise, the procedure needs to encompass a country's entire stockpile and serve to establish the baseline data that defines the stockpile. For all stock inventory events, it is necessary to plan a schedule that allows all targeted sites to be visited with sufficient time for the stocks to be measured and marked and the data recorded in a prescribed manner. Following the registration, the stocks need to be restored to the local facility holding the stocks or, alternatively, prepared to be moved to a prescribed facility in another location.

The planning should also ensure that all the necessary equipment will be procured and available at site where stocks will be registered into the system. In this regard, it is recommended to have sufficient medium-tip black indelible ink markers for marking all tusks or pieces in the inventory, accurate scales for weighing the products (if hanging scales, cloth, rope or cords for making a sling to hold the tusks will be necessary), and tape measures for measuring the dimensions of products (if such information is to be collected). If the stock management protocol necessitates photographs of each piece, digital cameras or some other appropriate device and a neutral background cloth should also be on site. Although for elephant ivory CITES exempts specimens less than 20 cm in size or 1 kg in weight, it is recommended that all such items be included as part of the inventory; in this regard, small pieces can be grouped together and sealed as appropriate in plastic bags that carry the identification number pursuant to the CITES marking as an aggregated item in the inventory. The same is true for small rhino horn pieces or powder. Pangolin scales are also commodities for which affixing individual marking is difficult so aggregating scales into sealable bags that record the number of pieces and weight is probably the most useful way to proceed in terms of stock inventories. For this purpose, transparent plastic bags should be procured for this purpose and be available at the site. For information capture, laptop computers or tablets need to be present so that all information can be captured in a systematic manner in an electronic format (basic practice would be served by a standardised Excel spreadsheet). As a cross-check, best practice also dictates the simultaneous manual collection of data using printed data collection forms (usually in a standardised Excel spreadsheet format so that each line constitutes a single entry and each page allows multiple entries) should be present. Manual data collection is best supported by the use of clipboards to form a stable writing surface. Finally, sufficient manpower needs to be deployed to execute a stock inventory, including individuals charged with moving the stocks into the registration area and then back into the storage facility, and other staff for the specialised tasks of weighing, marking and recording data in electronic and manual formats. Dual data collection is recommended as a safeguard to ensure accuracy.

Agreement on the data collection format—Stock inventories need to be designed to accommodate a minimum set of informational needs that minimally satisfy compliance with CITES requirements but could include additional information of interest to national authorities or others. Using elephant ivory as an example, the data collection format must include the following:

- numerical order of data entry (i.e. 1, 2, 3, 4, etc.) for tracking purposes of the number of items in the stockpile;

- country identification using two-letter ISO code (i.e. KE for Kenya; KH for Cambodia; VN for Viet Nam; etc.);
- year of acquisition in the stockpile (i.e. 2018, 2019, or if rendering as two digits, 18, 19, etc.);
- a discreet serial or registration number (i.e. 001, 002, 003 ...101, 102, 103, etc.); and
- weight in kg, if possible to the first decimal point (i.e. 0.2, 1.1, 8.9, etc.).

The above list satisfies the CITES requirements marking for ivory tusks and pieces and should conform with what needs to be written on each tusk or piece.

In addition, for national management, law enforcement or other administrative purposes, it may be prudent to record additional information. In this regard, in a digital age where so many readily available devices have the ability to take quality photographs of each marked piece of a stockpiled commodity, 'best practice' is rapidly moving towards a photographic component as an integral part of record in a stockpile inventory. Continuing with ivory as an example, this could include morphological data, including:

- the diameter in cm of each piece at its middle point;
- the length of the inside curve in cm (i.e. measured along the curvature of the tusk);
- the length of the outside curve in cm (i.e. measured along the curvature of the tusk);
- whether the specimen is a whole tusk (i.e. T), piece of ivory (i.e. P) or a worked ivory product (i.e. W);
- the recording any markings or unusual features about the tusk;
- the reason the specimen came into possession of the government (i.e. seizure, natural mortality, management-related mortality, etc.);
- the date and place the specimen originally came into the possession of the government in some cases linked to a seizures database or field patrol records;
- the case or exhibit number in a law enforcement case;
- the authority and place in possession of the tusk at the time it is registered in the inventory; and
- a comment field for any additional information.

Other fields of information may be required and can be added as appropriate. Each government authority that will manage stocks for a particular species needs to seriously consider and agree all of the information that will be necessary for capture every time a stock inventory procedure is conducted. All of this information needs to become part of the database system describing the stockpile.

Future movement of stocks to consolidate at designated storage facilities—If stocks need to be moved for future storage purposes following their initial registration, the workplan should anticipate and accommodate such contingencies, including budgetary provisions covering the costs of movement and consolidation. Anytime stocks are officially moved, it needs to be done under formal documentation that clearly notes the designated specimens involved, prescribes the route and means of travel between the two locations, and effectively shows stocks being checked out of one location and then delivered to another to become integrated into another stockpile some place else. Secure and accountable transport should be a stated objective, with copies of all necessary permits accompanying the movement and signed copies filed at both the original and repository facilities. The procedure also needs to entail amending the registration records for all specimens moved showing the change in location. Standard operating procedures should be developed that outline all

steps in the prescribed protocol so that stock movement always proceeds in a transparent and accountable manner.

Information management for a national stockpile database—The information generated on each individual specimen registered during any stock management procedure at every location needs to be collectively integrated into the database record that details all stocks held in a country. At the simplest level, the national database could be a basic Excel spreadsheet that aligns with all informational fields that characterise the data collection format described above, or it could be a more sophisticated bespoke database system. The government authority or authorities responsible for stock management need to authorise specific personnel who are responsible for managing and maintaining the database as an integral part of their terms of employment. The national stock database should be regarded as the ‘master copy’ cataloguing all registered stocks in the country and will become the basis for meeting a country’s annual reporting requirement to the CITES Secretariat. In addition, site-specific components of the national stock database, need to be present at all locations where stocks are securely stored so that there is an immediately available record detailing all specimens held in a particular place. Operating the national stock database to keep it updated and current is not necessarily envisaged as a full-time job, but it will entail a regular, and at times, considerable investment of time in countries where stocks are regularly coming into the possession of government authorities.

Periodic audits—Audits are important mechanisms for independently verifying the status of stocks which have been previously marked and stored in a secure manner in accordance with an agreed stock management protocol. An audit provides an opportunity to examine a random sampling of the stocks in question and verify that they have been recorded in the system accurately and essentially remain in an unaltered state. In the interest of transparency and accountability, ‘best practice’ dictates that audits should be conducted periodically – at least annually – as an important check of the system. Audits should also be conducted at moments when significant volumes of stock will be moved, sold, destroyed or otherwise altered from their normal state of storage. Finally, those who conduct the audit should be independent of those who manage and implement the stock management system so there is no conflict of interest when discrepancies or other issues are noted.

## **Annex 4: Stockpile Security and Storage**

### **The distribution and number of storage facilities**

In many countries, wildlife stocks are simultaneously stored in numerous locations, including protected areas, various ports of entry and exit, major towns and even in remote places, often under the management of various disparate authorities. Many such facilities can be totally unfit for purpose and even at the most prominent facilities security may be inadequate. It needs to be appreciated that secure storage of high-value commodities such as ivory and rhino horn will always be needed even if destruction instead of long-term storage is the recognized government policy. Careful consideration of various factors needs to be taken into account when deciding on the distribution, number and security features of designated storage facilities for targeted commodities so that they achieve the objective of long-term security against what can be a very challenging environment.

Depending on a range of circumstances, including physical geography, infrastructure logistics, illegal trade patterns and a range of administrative and security considerations, the needs of each country will be different and there is no single 'best practice' solution for stockpile storage. An important first step in deciding the best approach is to undertake a comparative analysis with a range of relevant stakeholders on the feasibility of consolidating target commodities in either one or more major storage facilities in a country. Issues that need to be thoughtfully considered include assessing the time and costs of arranging the logistics for found or seized items to be moved in an economical and secure manner. Where movement is not readily possible, temporary storage in a secure manner needs to be considered. Further, many seized items will have to remain in proximity to the place of discovery pending the completion of associated legal proceedings which in some cases can prove to be very lengthy. Such an assessment should produce a first cut 'blueprint' concerning the number and distribution of storage facilities in each country. Over time, as a country's stockpile management system unfolds, additional modifications to the original plan may become necessary, particularly patterns of illegal trade change and the quantity of targeted commodities substantially increases.

### **Types of storage facility needed**

With the objective of maximising security of the national stockpile in a cost-efficient manner, the establishment of a limited number of "core" storage facilities with greater investment in more sophisticated security features is a prudent option. One or more core storage facilities should serve as an ultimate catchment for the stocks emanating from any number of lesser "peripheral" storage facilities that expediently function as interim stockpile storage purposes before future movement and consolidation. Final decisions concerning the number of core and peripheral storage facilities needs to be made on an individual country basis.

### **Physical security considerations**

Stockpile storage facilities can be as basic as the deployment of a 20 or 40-foot shipping container<sup>2</sup> to a purposefully-built 'bricks-and-mortar' building with a host of 'state of the art' security features. In fact, a range of options can be effectively employed to do the required job of secure, long-term storage if properly considered and managed effectively. It is, however, strongly recommended that the use of rooms or cupboards that were not specifically built with security in mind should be avoided whenever possible. Where a number of storage facilities are required, containers will certainly

---

<sup>2</sup> Standard ISO shipping containers are 8ft (2.43m) wide, 8.5ft (2.59m) high and come in two lengths; 20ft (6.06m) and 40ft (12.2m).

outcompete the construction of buildings in terms of timely availability, cost and flexibility. Container-based facilities also offer the advantage of being easily relocated if necessary, and of being readily enlarged by placing additional containers alongside or on top of each other.

\*\*\*\*\*

This container in Pemba, Mozambique contained a large consignment of ivory seized prior to export in 2011. It was moved into the courtyard of a government compound and situated with its only entry point locked and placed flush against the trunk of a very large tree for the purpose of secure storage. This compound is guarded at night as a matter of course. Interestingly, this ivory storage facility remained unmolested for at least eight years when other stockpiles in the same city disappeared under circumstances that are not clearly understood. Sometimes simple, low-cost solutions produce very effective results.

\*\*\*\*\*



The starting point is to clearly understand what commodities are likely to be stored as ivory tusks, rhino horns or pangolin scales will have different requirements. For example, if facilities are meant to be multi-purpose and accommodate a range of wildlife commodities, a sectional approach might be useful with, for example, ivory tusks and sacks of pangolin scales stacked in a series of shelves and bays, whilst less bulky but far more valuable rhino horns could be kept in a compartmentalised series of sealed lockers. It also may be expedient to separate stocks that were acquired from different seizure events, especially where court cases are still pending, from stocks derived from other purposes. Access to stocks and movement within the storage facility needs to be carefully considered so that an adequate working environment is maintained for adding in new stocks or retrieving existing stocks for various reasons such as collecting evidence for presentation in the courts, or specific specimens for forensic examination or, from time to time, for the purpose of disposal and/or destruction. There is a need to ensure sufficient space for conducting stocktaking exercises or audits which are likely to transpire on occasion.

### **Institutional responsibilities**

In practical terms, the physical security of stocks in a storage facility and their administration in terms of, for example, data and database management, future movement for various reasons, or assessment in terms of audits, will unfold as very separate functions over time. Whilst a single government agency should be designated by law to be responsible for the security of storage facilities holding ivory, rhino horn and other valuable wildlife products, the duality of stock administration needs to be simultaneously accommodated. Thus, within the government agency responsible for the storage facility, security considerations need to be implemented by a law enforcement unit which may have access to arms, whilst management functions associated with the stocks should remain the responsibility of separate personnel from an administrative unit of the same government authority. Such an arrangement avoids the unrealistic and inappropriate result of making administrative personnel responsible for security functions where stockpiles are concerned, or vice versa. Each storage facility needs an appointed storekeeper responsible for monitoring the stocks in their store.

How the security and administrative personnel work together must be clearly specified in Standard Operating Procedures to leave no room for misinterpretation. The SoPs will necessarily deal with a host of considerations, including:

Handling of keys—Best-practice principles indicate that duplicate sets of keys for accessing the storage facilities need to be kept to a minimum, preferably just two sets, one for active use and one kept remotely under code in secure storage as a backup so that, if stolen, the purpose of the keys would never be apparent to the thief. The active set of keys should never be in the possession of a single individual but rather needs to be split between two, possibly more, individuals who will sign for one or more keys and keep them on their person at all times. In this way, all individuals with keys must be present whenever the storage facility is opened and they should remain at the location until it is re-locked. Each time the facility is opened, it needs to be logged by the storekeeper as an immutable record. Pre-planned procedures for the handing over of keys to another deputized individual when a responsible key holder is to be absent also need to be established.

Marking and registration of stocks—The indelible marking of all individual specimens in the stockpile with a discreet code is fundamental for their future tracking and security. If stocks remain unmarked, detection of their subsequent illegal removal is inherently difficult making them highly vulnerable to leakage. Whenever possible, the SOPs should provide for the initial custodial agency to mark, weigh and measure the seized specimens immediately according to the specified format and sequence. When that is not possible, such stocks must be marked and registered when delivered to the storage facility, each of which should be equipped with scales, tape measures and indelible markers. If the storage facility has a designated computer available, the record of the stocktaking can be electronically captured. If that is not possible, then a manual system needs to be in place so that all of the necessary information can be duly captured. The SOPs should specify that the maintenance of a hard and soft copy record at every site is required. Every time new items are registered, the relevant documentation must be forwarded to the lead stockpile management agency as soon as possible so that it can be integrated into the national stockpile database.

Control of movements—Regardless of the reason, no item registered in the national stockpile database should ever be moved into or out of a storage facility without due authorisation and control. Recognising that stocks become vulnerable to theft or robbery whenever they are moved, the timings and routes of such movements should be planned and authorised under documentation, and then executed in a confidential manner on a 'need-to-know' basis to ensure their security. Standardised movement or transfer forms must be used that list all specimens to be moved and other pertinent information, including the identification of the driver and all individuals that will accompany the stocks during the move and the time and route to be taken. These forms need to be signed sequentially, first by the storekeeper releasing the items, then the officer transferring them, and finally the storekeeper receiving the stock. Further, the forms should be done in (at least) triplicate, so that one signed copy remains at the source location, another remains at the repository location, and the third goes to the lead stockpile management agency. These and other movement issues need to be clearly outline in the SoPs so that all procedures are understood.

## **Annex 5: How to Conduct a Stock Audit**

### **Background:**

Audits are important mechanisms for independently verifying the status of stocks which have been previously marked and stored in a secure manner as part of a stock management system. An audit provides an opportunity to examine a random sampling of registered specimens and verify that they have been recorded in the system accurately and essentially remain in an unaltered state of storage. In the interest of transparency and accountability, best practice dictates that audits should be conducted periodically, for example, annually as an important check of the system. Audits should also be conducted at moments when significant volumes of a stored wildlife commodity will be moved, sold, destroyed or otherwise altered from the normal state of storage in a designated facility under government custody. The procedures for conducting an audit need to be carefully outlined in SoPs and these should be used to guide the process. The following is a summarised account of how audits typically take place.

### **Marking on stocks:**

All specimens of stocks which are part of a stockpile management system should be marked individually so that each individual piece has a unique identity that is recorded when it becomes part of the inventory record for the particular wildlife commodity in question. See Annex 2 for a description of the marking systems that have been agreed under CITES. For example, with respect to ivory stocks, a tusk marked **VN/17/285/13** would indicate a piece of ivory that was the 285<sup>th</sup> item registered in the Viet Nam national stockpile database in 2017 with a weight of 13 kg. Likewise, an ivory tusk that was marked **KH/17/285/13** would indicate the same thing except that Cambodia would be the country holding the particular tusk.

It is also possible that specimens will have other markings in addition to what is required in terms of the CITES marking system. For example, specimens that were seized in a law enforcement action and were part of a court case might have the criminal case number written on them so they could be readily identified as evidence. In range States, field stations where specimens have collected at *in situ* locations may have codes that note the place of recovery. It is assumed that all specimens subjected to an audit have been marked and registered as described above.

### **How to conduct an audit:**

Stock audits can be conducted in various ways but generally always require scales for weighing selected specimens. Preparations call for arranging appropriate scales and tape measures in advance if they cannot be guaranteed to always be on site at the storage facility where the audit will take place. When conducting an audit, it is important to ensure that government staff who can handle the specimens being audited are available to assist with retrieving and replacing stocks as appropriate. Such operations are often quite dirty so appropriate work clothes are necessary. It is important to agree all components of the audit in advance with the team present who will provide assistance.

Stock audits usually comprise the following steps:

#### Working from the stock inventory list:

1. Using the stock inventory list of all specimens in the stockpile, generate a random selection of items. If the stock inventory list is available in an electronic format, it may be possible to

generate a random list using a computer programme. If not, use some other means, but produce a list of a pre-determined number of pieces that will all need to be physically located and then examined. Obviously, the volume of work will be dependent upon how many specimens are in the overall stockpile. Aim for an examination that covers between 5% (large stockpiles) to 15% (small stockpiles).

2. With the random list in hand, find each piece in the stockpile, remove it from storage for examination and weighing to confirm that all details align with the information in the stock inventory list. If particular items cannot be found, or there are other discrepancies, note them down. Remember that finding very small pieces can sometimes be difficult, particularly if the stockpile is large. Further, it is worth noting that weights may not always be in sync for a variety of reasons, but mostly because different scales produce different weights. Some wildlife products such as ivory also have a tendency to lose weight over time if stored in conditions of low humidity. In any event, small discrepancies in terms of weight are likely to be the norm and not indicative of any problematic issue.
3. Once everything has been audited, be sure to have the storekeeper of the storage facility co-sign each page of the audit record stemming from the physical inspection. This is critical so that there is no future dispute concerning the result of the audit.

#### Working from the stockpile:

1. In a reverse exercise, using the stockpile itself, remove a pre-determined number of specimens for checking with the stock inventory list. Try to choose a selection of different sized items. Again, the volume of work will be dependent upon how many pieces are in the overall stockpile. Aim for an examination that covers between 5% (large stockpiles) to 15% (small stockpiles).
2. As before, the numbers and weights of the individual pieces should be located and verified on the stock inventory list. If items cannot be found on the stock inventory list or there are other discrepancies, note them down.
3. Again, once everything is done, be sure to have the storekeeper counterpart sign off on all of the sheets that record the information stemming from the physical inspection.

#### Finding unmarked stocks:

Generally speaking, all stocks in storage facility will be marked and recorded in the inventory list of facility's holdings. The only exceptions may be very recent acquisitions that have just been delivered to the store without having been previously marked and registered. If that is the case, the storekeeper should be in a position to apprise the audit team of this development in advance of arrival at the storage facility so there are no surprises in this regard. It does sometime happen that a major seizure event delivers a large haul of wildlife contraband just prior to a planned audit and it has not been possible to process the stock before the audit. SoPs should clearly outline how unmarked new stocks should be treated and part of the audit should assess that the prescribed guidelines are being followed.

Although unexpected in the context of sound stockpile management, it is nonetheless possible that the auditor will find unmarked stocks in the course of an audit. All such items need to be noted. If the quantity of unmarked stocks involves a single specimen or a relatively small number of pieces, it

may be possible to undertake a collaborative marking exercise with the storekeeper and his staff on the spot, so that each specimen is marked following the appropriate CITES or national protocol and the details of each specimen are recorded to produce a new inventory listing. Such an exercise could be regarded as an important and practical training initiative that will lead into the introduction of a future stock management system.

On the other hand, if a considerable quantity of unmarked specimens is unexpectedly found and it is beyond the scope of the audit to actually assess and mark it on the spot, a description of what was observed and any explanations concerning why it is there and was not brought to the attention of the audit team in advance of their visit needs to be captured in detail. If possible to simply count the number of specimens involved, then do so, but if precise counting is impossible, then some other form of estimation is warranted to capture the scope of what was found. Such an occurrence should be considered to be an atypical situation which needs to be carefully investigated. SoPs should require that all specimens be marked and registered within a certain period of time so any deviance from prescribed procedures needs be noted.

#### Prepare an audit report:

A report on what was observed during the audit should be prepared. Be sure to describe the methodology in terms of how the audit was conducted and be sure to ensure that the full stock inventory sheet, the list of specimens that were physically examined, and the names and contact details of all participants or individual present at the audit, are attached to the report as annexes. The main body of the report should describe what was observed, noting any particular problems or issues. If satisfied that most things were in order, make sure that this is indicated. On the other hand, if there were problematic issues, especially evidence of stocks having been removed or otherwise tampered with, be sure to draw attention to such issues. The audit report should formally go to designated government authorities as outline in the SoPs.

JANUARY 2024

WORKING TO ENSURE THAT TRADE  
IN WILD SPECIES IS LEGAL AND  
SUSTAINABLE, FOR THE BENEFIT OF  
THE PLANET AND PEOPLE

**TRAFFIC**

TRAFFIC  
+44(0)1223 331 997  
[traffic@traffic.org](mailto:traffic@traffic.org)  
[traffic.org](http://traffic.org)