



**GUIDELINES  
AND TEMPLATE  
STANDARD  
OPERATING  
PROCEDURES  
FOR STOREROOM  
MANAGEMENT**

# **GOLD STANDARDS For The Management Of Ivory & Other Wildlife Products**

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These Gold Standards and Standard Operating Procedures are currently being field-tested and will be reviewed March 2021.

We would appreciate feedback to [rmusgrave@elephantprotectioninitiative.org](mailto:rmusgrave@elephantprotectioninitiative.org)

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## TERMINOLOGY

**Seized Ivory:** Ivory either seized or confiscated by the authorities because it was illegally obtained. This category includes raw ivory and worked and un-worked pieces.

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**Recovered Ivory or Non-seized Ivory:** Ivory from animals that died of natural causes, or animals that have been subject to 'problem control' measures, controlled culling programmes. (e.g. PAC – problem animal culling) or legal hunting.

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**Raw Ivory:** Includes all whole elephant tusks (except those defined as 'worked ivory' below), polished or unpolished and in any form whatsoever, and all raw elephant ivory in cut pieces, polished or unpolished and howsoever changed from its original form, except for 'worked ivory' (CITES 10:10 R17).

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**Worked ivory:** 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; (CITES 10:10 R17).

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**Single leaf/double leaf gates** Single leaf Gates: refer to gates with only one moving section that is either hinged or sliding. The single section forms a complete barrier across the opening.  
  
Double leaf Gates: refer to a pair of moving sections which both need to be closed to form a barrier. Each section is hinged, with a fixed point where they meet in the middle.

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**Storeroom personnel** This document refers to the following roles and positions, which are expanded on in the document. The position title is not fixed and should be modified to

correspond to positions titles in each country.

**Storeroom Supervisor:** A senior officer who is in overall charge of a single storeroom, responsible for supervising the Storeroom Manager to ensure the protocols are adhered to.

**Storeroom Manager:** In charge of the day-to-day management of a storeroom.

**National Storeroom Supervisor:** In charge of overseeing all storerooms in the country and the work of all Storeroom Supervisors, collating information on stockpiles, around the country, movements and new arrivals.

## **ABBREVIATIONS**

CCTV	Closed Circuit Television
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CoP	Conference of Parties
EPI	Elephant Protection Initiative
ETIS	Elephant Trade Information System
ICCWC	International Consortium on Combating Wildlife Crime
IMF	Ivory Movement Form
ISO	International Organization for Standardization
JMP	Journey Management Plan
LEA	Law Enforcement Agency
MIKE	Monitoring the Illegal Killing of Elephants
MOU	Memorandum of Understanding
PAC	Problem Animal Control
PPE	Personal Protection Equipment
RTA	Road Traffic Accident
SOP	Standard Operating Procedures
SMS	Stockpile Management System
UNODC	United National Office on Drugs and Crime



## 1. Introduction

The Elephant Protection Initiative (EPI) is an African-led, partnership based and results oriented initiative which builds on the African Elephant Action Plan (2010) to deliver immediate and longer term action to protect elephants and to tackle the illegal trade in ivory. One of the EPIs objectives that Governments commit to is to “Keep ivory out of economic use’. Achieving this objective requires a multifaceted approach, one aspect of which is the effective management of the ivory accrued by Governments through seizures, natural mortality and legally killed elephants. To ensure once ivory is in Government custody, it is not leaked back into the illegal wildlife trade.

This document aims to provide guidelines for the management of ivory or other wildlife products. The document describes the minimum and Gold Standards for different aspects of ivory and wildlife product management including:

- Physical Storeroom Security
- Storeroom Management
- Record Keeping
- Movement of ivory

For each aspect of management guidance, the document outlines the minimum Baseline Standard, which must be attained and maintained, versus the additional Gold Standard requirements which countries should strive to achieve. The document can be used as template Standard Operating Procedures (SOPs) which can be adapted to fit a specific country’s needs.

It is acknowledged that the local context, infrastructure and capacity challenges, and security threats associated with ivory management differ significantly between countries, therefore the intention is that these Gold Standards are flexible enough to be adapted to any environment.

The Gold Standards aim to meet and exceed the recommendations for the management of ivory laid out by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). This document is not intended to be the only guidance or set of procedures required to safely secure recovered or seized ivory. There are other existing documents relating to ivory management, and this document should be read in conjunction with them including:

- The CITES regulations (including *CITES Resolution 10.10 (Rev. CoP 17)*).
- UNODC (2012) Wildlife and Forest Crime Analytic Toolkit
- ICCWC (2014) Guidelines on Methods and Procedures for Ivory Sampling and Laboratory Analysis

- Milledge (2005) Rhino Horn Stockpile Management: Minimum Standards and best practices from east and southern Africa. TRAFFIC East/Southern Africa.

While these Gold Standards focus on the storage of ivory, they may be applied equally to any other high value wildlife product held by the Government. It is hoped a system and standards for ivory should be applicable to other wildlife products and should not result in different forms/systems for different items. This document does not cover basic national or departmental policy for the long handling ivory or wildlife products. For example whether confiscated items after any relevant court procedures have concluded should be destroyed on a regular basis.

### 1.1 DEFINITION OF THE STOREROOM TIERS

There are different types of storerooms in any given country, needing different levels of security, management and procedures depending on the role and size of the storeroom. Rather than categorising the different types of storage facilities by zone - for example "National", "Regional" or "Local", this document has categorised the storerooms into different tiers, which are defined below. The different "levels" of storerooms will be referred to as Tier 1, 2, 3 and 4, where Tier 1 has the highest levels of security procedures and Tier 4 the lowest. The Tiers are defined by their use and duration ivory is expected to remain in in them. The document outlines the minimum standards to maintain for that tier and what is required to obtain Gold Standards.

Whilst adapting these template SOPs to a country, it is advised first to list all storerooms in the country and determine which tier each storeroom corresponds to and therefore which Standards that it should aim to meet. Ideally **at least** one store in each country should comply with Tier 1 standards, and this store should be where the vast majority of ivory is stored long term. A country might have one or several Tier 1 storerooms, and numerous Tier 2 or Tier 3 storerooms, or one Tier 1 and numerous Tier 3.

All Tiers of storerooms may contain other confiscated items which require storage, the storeroom should be organised in such a way to enable the segregation of the different item types.

#### **Definitions:**

**Tier 1:** A centralised store where the highest level of security is observed and where ivory could be stored for the longer term if needed. There is no upper limit to the time ivory should remain in this store, and no limit to the volume of ivory stored (aside from the limit imposed by space available).

**Tier 2:** A store where an intermediate level of security is observed and where the expectation is that ivory will be stored here on a temporary basis until it is moved to a Tier 1 facility. Examples might include storage used while ivory is required to remain in the near vicinity of the court for criminal prosecutions, or a regional or main store in a National Park where locally recovered ivory is stored until an amount warranting transfer to the Tier 1 facility has accumulated. In the case of each item, a clear reason must be recorded as to why the ivory cannot be immediately moved to a Tier 1 facility and a set time for review of the circumstances must be logged on the system.

**Tier 3:** A local, temporary storeroom where recently seized or recovered ivory is stored until a suitable time when it can be moved to designated storeroom facility (Tier 1 or Tier 2 storeroom). In such cases ivory should generally not remain in a Tier 3 storeroom for longer than 1 month. An example could be ivory stored in an armoury; a small storeroom, or in a locked cupboard in a secure office at a National Park.

**Tier 4:** The storage and guarding of ivory in the field immediately following its collection, for example during a patrol, or a seizure from poachers. The expectation is that the ivory will be moved to a storeroom within 24 hours.

## 1.2 CENTRALISATION OF IVORY STOCKPILES

It is recommended that ivory within a country is centralised to a Tier 1 storeroom wherever possible, rather than split up around numerous smaller stores. Reasons for this include the following:

- To minimize unnecessary replication of labor-intensive security methods and inferred costs required for storeroom security, across multiple locations.
- To minimize the number of locations where ivory is stored (particularly for the long-term, which requires higher standards of security) thereby allows the relevant Authority to deploy their limited manpower more effectively.
- To reduce the threat of a storeroom break in. The risk of a secure storeroom being robbed by external parties is not considered high – alleviating concerns about focusing large quantities of ivory in a few key locations.
- To counter the risk of insider threat. Insider threat is considered significant; so focusing ivory storage in as few locations as possible, with fewer people having access to the stored ivory, reduces the reducing the risk of a corrupt person exploiting their access.
- To increase the degree of specialist care and honing of expertise in storeroom management. Having fewer people involved in the storage of ivory also means those few roles would likely become almost entirely focused on storeroom management. This higher degree of specialisation could be expected to mean a higher degree of professionalism within those roles.
- To increase the efficiency and accuracy of the auditing process for storerooms by having a smaller number of stores.

Therefore, it is recommended to have one or more Tier 1 storerooms for longer term ivory storage, and then as many Tier 2 and Tier 3 storerooms that are required around the country to hold the ivory on a temporary basis before being centralized to the Tier 1 storeroom.

Detailed SOPs on when ivory should be moved to a higher Tier of storeroom are included in Section 4.5.

### **1.3 CITES RECOMMENDATIONS FOR IVORY MANAGEMENT**

This document aims to support Governments to meet and exceed the CITES recommendations for ivory management. The recommendations are referred to throughout but, in summary, the relevant recommendations at the time of drafting (March 2019) are the following:

#### ***1) CITES Resolution 10.10 (Rev. CoP 17)***

##### ***Regarding marking***

“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;”

##### ***Regarding the traceability of elephant specimens in trade***

22. “URGES Parties to collect samples from large-scale ivory seizures (i.e. a seizure of 500kg 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;

23. RECOMMENDS that Parties share with the Secretariat and source countries information on the origin or age of seized ivory specimens arising from forensic analysis of samples to facilitate investigations and prosecutions, and for analysis by MIKE and ETIS in their reporting to the Standing Committee and the Conference of the Parties;...”

##### ***Regarding trade in elephant specimens***

6. “FURTHER 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: ...”

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;...”





## 2. An overview of the Gold Standards

The following are the overarching best practice principles for storeroom management, which are expanded on within the document.

### 2.1 BEST PRACTICES FOR STOREROOM MANAGEMENT

1. Management of the storeroom will be clearly established; with a Storeroom Supervisor who has ultimate responsibility for the storeroom and its contents; and one or more Storeroom Managers appointed to oversee the day to day running of the storeroom.
2. The roles and responsibilities of Storeroom Supervisors, Storeroom Managers, and those who work under them at the storeroom will be clearly defined and understood.
3. At least one Storeroom Manager must be in attendance whenever the storeroom is accessed. (i.e. when the storeroom is opened to add or remove items or during any visits, inventories or audits).
4. The storeroom should be physically secure, and have clearly established access control and key control procedures. Only authorised persons will have access to the storeroom and a list of those authorised persons will be maintained at each storeroom. Only one person (e.g. National Park warden or Director or Wildlife Department) should give the authority to staff to be a Storeroom Manager or Supervisor, and approve additional authorized persons. All authorized persons should sign an agreement of their responsibilities and confidentiality procedures within their role.
5. Storerooms will be kept secured at all times.
6. The movement of any materials in or out of the storeroom will be immediately and accurately recorded on a centralised inventory database, and where preferred also on a log-book maintained on-site.
7. Details recorded for incoming items will include: date, time, description of ivory, weight, ID of piece/s, details of its recovery (i.e. recovered/seized), any legal case or other ID associated with it, person checking it in, person in facility authorising its entry, and exact storage location within the storeroom.
8. Details recorded for items removed from the storeroom will include: IDs of piece/s, person taking it out, date and time of removal, where it is going, whether it will be returned (and if so, when), and reason for removal of the item.

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9. The National Storeroom Supervisor (or whoever within the Department has management supervision for the storeroom) should be advised whenever access to a Tier 1 storeroom is required.
10. All materials will be stored in an appropriate manner that allows individual pieces (or collections of pieces, in the case of ivory smaller than 20cm in length) to be easily retrievable.
11. Stock records will be kept accurately, up to date and available for the Storeroom Supervisor, or other Authorized individuals, to review at any time.
12. The storeroom will be kept clean and well-organised at all times, with environmental conditions that ensure the safe preservation of its contents and appropriate health and safety measures for the staff.
13. The Storeroom Supervisor will conduct a regular audit of the inventory to ensure that the above procedures are all being properly observed.
14. The storeroom will have emergency procedures in place to ensure that any breach in security, critical lapse in storeroom conditions requiring urgent action is immediately reported to the Storeroom Supervisor, and central management, and a procedure in place for detailed recording of breaches and the occurrence of other common concerns or issues.

## **2.2 BEST PRACTICES FOR THE MOVEMENT OF IVORY**

1. Any movement of ivory should be carefully planned. A Journey Management Plan (JMP) should be completed, which will include a risk assessment of the proposed move. This plan will cover who would provide authorisation for the movement, having reviewed the JMP and associated risks.
2. An Ivory Movement Form (IMF) should also be completed, which includes detailed information on pieces being moved. This, will serve as an exact record of what ivory has been moved, and when, and confirm its safe arrival in the receiving facility, serving as a reference document for the update of inventories at both the dispatching and receiving facility. It could also serve as part of the chain of custody forms.
3. The plans for the movement of ivory should be kept confidential. Details of the JMP should be revealed only to those immediately involved in the move, as close to the scheduled movement time as feasibly possible, and with only such details as absolutely necessary. For example, while the driver can be informed of a duty the preceding day, they should not know the cargo until immediately before the move. Guards can be informed of a duty to protect a movement, but not be informed of the destination.
4. Moves should be conducted in a manner which is as low-key as possible, so as not to draw attention and so bystanders that do observe the activity do not associate it with anything of high value.
5. In close liaison with Law Enforcement Agencies (LEAs), appropriate documentation should be maintained to ensure an evidential chain of custody in cases of seized ivory where a legal case is on-going or may be initiated, (if compliant with local evidentiary laws, the IMF could serve as chain of custody).
6. The safety of personnel moving the ivory should be the highest priority. Reduce security risks as above and comply with normal safety procedures such as where possible only conducting moves in daylight to avoid driving at night.



### **3. Physical Security and Infrastructure of Store-rooms**

#### **3.1 TIER 1 STOREROOM**

Tier 1 is the most secure storeroom.

##### **3.1.1 Location and General Security Objectives**

Multiple layers of physical security are important for the secure storage of targeted goods such as ivory - ensuring that there is not a single aspect that, if breached, leads to the exposure of the whole facility. Each layer of security should aim for physical protection, detection and monitoring systems that adhere to the “3D Principle” of physical security management: to Deter, Detect and Delay any intruder. The storeroom itself should also be in an environment where access can be controlled and restricted to the individuals who have permission to be there. It is recognised that the compound where the ivory is stored may serve multiple purposes and also may be shared by another Government Department - this is acceptable, providing that the compound as a whole has adequate security measures in place. The general principle is to clearly delineate the boundary and present an obstacle to entry.

##### **Minimum Standard:**

- a) The storeroom should be located within an area that is secure, discrete and not normally accessed by the general public (unless they have specific business to conduct there).
- b) If members of the public are in the compound they should not be made aware of the presence of the storeroom and their access to the area should be monitored and controlled.
- c) Consideration should be given to threats posed by the surrounding area outside of the compounds perimeter (e.g. neighbouring buildings) and a secure perimeter surrounding the building that the storeroom is located in should be maintained at all times.
- d) The storeroom or building may house other items of high value, and all security procedures should apply with regards to these items too.

### **3.1.1 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The storeroom is a stand-alone building that does not require access for other means aside from accessing the storeroom.
- b) The storeroom should consist of 2 separate rooms with separate doors and locks. One room will contain the “permanent” inventory of ivory to be stored long term. This room will have to be opened only for incoming shipments rather than any items being removed - except in exceptional circumstances. The second room will contain ivory which is being temporarily stored there - for example ivory needed for current court cases, or for ivory which has recently arrived and is yet to be catalogued and entered into the permanent inventory.

### **3.1.2 Perimeter Security - Barrier**

The compound the storeroom is located in needs to be secure (this could be the compound for the entire building or a perimeter just around the storeroom).

#### **Minimum Standard:**

- a) The compound containing the storeroom should be completely surrounded by a perimeter barrier of robust construction (e.g. wall or fence) which presents an obstruction to individuals seeking to enter the compound and limits the likelihood that the perimeter barrier could be climbed.
- b) The perimeter barrier should provide a visual barrier which prevents observation of the storeroom or compound from outside.
- c) The perimeter barrier should be kept free of vegetation that could act as a climbing aid, degrade the physical integrity of the barrier, or allow an individual to approach the barrier without being seen.
- d) The perimeter barrier should be physically sound (i.e. there should be no gaps or areas where a breach could easily occur). Any gaps identified should have extra defences built in e.g. an enhancement to the physical barrier, increased guard patrols.

### **3.1.2 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) If building or selecting a new storeroom a general stand off area of 3 metres around the compound should be established. Neighbouring buildings (including temporary buildings) should be at a distance of 3 metres and any vegetation should be cut back to this distance.

### **3.1.3 Perimeter Security - Gates**

- a) Gates (pedestrian or vehicle) to the compound should be of robust construction and the same height as the rest of the perimeter.
- b) Gates should be manned at all times when needed for access to the compound i.e. during working hours. When not being used for access (for example after the working day), they should be kept closed and barred/locked.

- c) Vehicle barriers can be used instead of gates during hours when the compound is manned and where the general security environment makes this possible. At night, gates should be used in addition to the barriers, or 24 hour guards are required.

### **3.1.3 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) If possible the gates should be of single leaf construction, but if double leaf the central point where the leaves meet should allow for solid fixing into the ground with a metal bar into concrete. This bar should be inaccessible from the outside and the gap between the gates should be such that the bar cannot be accessed.
- b) Hinges must be concealed from outside interference and fixed strongly onto gateposts or into the barrier fabric with the ends of the hinge pins burred over (smoothed/removed to prevent access to the pin).

### **3.1.4 Physical Security of Storeroom - Doors, Walls, Roof and Windows**

The storeroom needs secure physical infrastructure, which includes:

- a) The walls and roof of the storeroom should be constructed of a solid material which is resistant to any physical attack from the outside - for example concrete, brick or metal for the walls and concrete, metal or tile for the roof.
- b) Any openings to the storeroom other than the door (e.g. for ventilation or air conditioning units) should be less than 245 square centimetres in cross section and have a metal security grill securely fitted to the building fabric on the external side.
- c) Any windows to the storeroom should be covered from the inside by an opaque material to prevent anyone seeing in.
- d) Windows should be fitted with strongly constructed metal bars secured to the building fabric.
- e) There should be a single entry to the storeroom.
- f) Doors and doorframes should be constructed of steel or be steel lined and securely fitted into the building fabric. The door should be solid with no glass, viewing holes, etc.
- g) The door should be kept closed and securely locked at all times when not in use.
- h) When in use, the door should be kept closed whenever possible to prevent viewing from outside or opportunistic theft when the staff member has their back turned.
- i) The storeroom should be made weatherproof and fitted with adequate drainage to ensure that any rainwater or flooding does not penetrate the storeroom and damage the contents.

### **3.1.4 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The storeroom should have no windows.

### **3.1.5 Storeroom Door Locks**

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- a) The door to the storeroom should be locked with a minimum of 2 separate locks, each requiring a unique key. (See section 4.2 on key control).
- b) At least one should be a padlock fitted to a heavy duty steel hasp and staple. The Hasp and staple should be welded to the metal door for maximum strength.



Hasp and staple lock

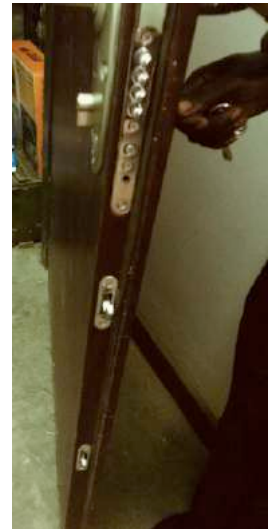


Closed shackle design lock



Straight shackle design lock

- c) Any padlocks should be a straight or closed shackle design and conform to the highest security standards. The following are appropriate standards for padlocks used for storerooms:
  - BSEN 12320 Grade 5 or 6
  - CEN Grade 5 or 6
  - Solid Secure Gold
  - LPS 1652 Level 4+
- d) Any padlocks that are exposed to the elements should be weather proofed to prevent corrosion or damage to the padlock.
- e) Providing at least one padlock is used, then a locking mechanism integral to the door itself may be used as the second lock. In this case it must consist of a multi point locking system with a minimum of 3 locking points that come into place with solid steel bolts when the key is turned. Locking points must be spaced evenly along the height of the door - top, middle and bottom.



### **3.1.5 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The door to the storeroom should be locked with a minimum of 3 separate locks, each requiring a unique key.
- b) The storeroom should have an additional lock connected to a biometric reader (for example fingerprint ID). This will ensure that only authorised persons who are registered on the system can gain access, and furthermore will provide an accurate and auditable record of exactly who entered the facility at any time. The biometric lock can be electromagnetic (and should be fail-safe) providing the 2 other locks are in place as above.
- c) Any padlock locking points should be enclosed within a solid metal lock box to prevent tampering with or cutting the padlock itself.

### **3.1.6 Electricity Supply and Lighting**

- a) The storeroom compound should have a consistent power supply, including a backup generator where required.
- b) The perimeter of the compound should be illuminated in hours of darkness to enable guards to clearly see the interior of the compound in the vicinity of the storeroom.
- c) Perimeter lights should be maintained in good working order and be located inside the compound boundaries providing an even lighting that prevents areas of shadow.
- d) The lights should be mounted on either: the vertical surfaces of the building or on posts inside the perimeter.
- e) All external lights should be checked daily and any faults reported and fixed within 24 hours.
- f) Control of the lights should be easily accessible to the guards.
- g) The interior of the storeroom should have its own lighting which clearly illuminates all areas evenly.
- h) Control of the internal lighting should be easily accessible to the Storeroom Manager and any officers operating CCTV.

### **3.1.7 Alarms**

- a) An alarm system should be installed and maintained by a reputable security supplier conforming to international standards.
- b) As a baseline standard, the alarm system should be fitted to the door of the storeroom in such a way that any opening of the door without the alarm being disabled will cause the alarm to sound.
- c) Only key holders for the storeroom, the Storeroom Manager and the Storeroom Supervisor should be given codes for the alarm system.
- d) The alarm system should be set at all times when the storeroom is locked. This must be checked by the Storeroom Manager after the storeroom has been accessed.

- e) The alarm system should be checked by the Storeroom Manager on a weekly basis to ensure it is operating correctly. This should include setting the alarm and deliberately activating it to ensure the sensors are operating properly.
- f) Any faults to the alarm system should be logged, reported to management and the security company immediately and repaired within 24 hours.

Of equal importance is an established procedure for responding to any activation of the alarm:

- g) The alarm should be monitored 24/7 and an effective response to its activation should be in place.
- h) At a minimum this should be the guards alerting the Storeroom Manager, conducting a visual inspection of the exterior of the storeroom and locking down the area to prevent anyone entering or exiting the storeroom or its perimeter.
- i) On the arrival of the Storeroom Manager or other key holders, the storeroom should be opened and inspected and the cause of the alarm identified.
- j) A record of the alarm's activation, the reasons for it and the response should be entered on the security incident log, along with any lessons learned and changes in procedure required.

### **3.1.7 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The alarm system should be set up such that each person permitted to use the alarm system should have their own unique code for setting/deactivating the alarm. In this way it will be possible through a computerised log to clearly identify whose code set or unset the alarm, and when.
- b) It is recommended to install a passive infrared (PIR) system within the storeroom to monitor movement within the secure storeroom itself. Additional sensors may be added to any secure corridor leading to the storeroom if appropriate.

### **3.1.8 CCTV**

- a) A CCTV system should be installed and maintained by a reputable security supplier conforming to international standards.
- b) Cameras should cover the door to ensure that a clear image of all those entering and leaving the storeroom is obtained.
- c) While there is no expectation for the CCTV to be actively monitored on a 24/7 basis, it should be available 24/7 for the guard force to use to augment their procedures.
- d) Images recorded by the CCTV should be stored for a minimum of 1 month and accessible to authorised people only.
- e) CCTV systems should be subject to daily checks to ensure all equipment is in working order and that images are being recorded, including that the date/time stamp is correct.
- f) Any faults should be reported immediately and remedied within 1 week. If the CCTV system is temporarily out of action, additional security procedures should be considered if necessary.



### **3.1.8 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) If applicable, the corridor approaching the storeroom and any walls of the storeroom which are external to the building should be covered by cameras.
- b) Additional cameras should cover all aspects of the store itself, including separate cameras covering any “corridors” created by racks or shelves of stored ivory.

### **3.1.9 Procedure for Guarding the Storeroom and its Contents**

The following sets out the expected routines and performance standards for the guarding of the storeroom. The function of guarding is to protect the items stored within the storeroom. For the purposes of this SOP, guards are responsible for all security outside of the storeroom walls; the Storeroom Manager is responsible for all security inside the storeroom walls. At all times, should they have any concerns, or notice any unusual circumstance, the guards should notify the Storeroom Manager immediately. A Tier 1 storeroom should have a guard force on duty 24/7 covering the general compound. The guards will likely be guarding the whole compound, and the below should be incorporated into their routine.

#### **A. Perimeter**

- a) Guards will conduct foot patrols around the inside of the compound perimeter during both daylight and hours of darkness at least once every hour.
- b) The exact start time and route of the patrol should be varied to avoid the establishment of a predictable routine.
- c) Guards will ensure that the compound is suitably illuminated and that the security lights are in working order. Any faults should be reported immediately for repair.
- d) Guards will monitor the integrity of all physical barriers around the perimeter, and the physical integrity of the building where the storeroom is held. Any defects must be reported to the facility manager.
- e) Signs of perimeter breaches (e.g. scuff marks on wall, crushed vegetation, climbing aids against the outside of the perimeter) must be reported immediately, including to the Storeroom Manager.
- f) Guards will ensure that the external doors to the storeroom are secure by checking them during their routine patrol.

#### **B. Immediate Storeroom**

- g) The Storeroom Manager should be issued with a list of Authorised Persons who are permitted to enter the storeroom.
- h) The Storeroom Manager should check the identity of all those entering, registering their names in an Entry Log.
- i) Anyone not on the Authorised Persons list should not be given access without the written permission from the Storeroom Supervisor.

## Guidelines for Ivory Management

- j) Bags and other equipment will not normally be allowed in to the storeroom. Where there is a legitimate need to bring a bag into the room then the Storeroom Manager should inspect the bags and any equipment being brought in, and again on their removal from the storeroom.
- k) The Storeroom Manager should conduct a pat down of all those departing the storeroom to ensure that they are not removing any items.
- l) Any ivory being moved out of the storeroom must be accompanied by an Ivory Movement Form (see below) on which its details are recorded. The Storeroom Manager should ensure that this form is complete and authorised appropriately before allowing the ivory to be removed.

### **3.1.10 Health and Safety / Fire**

One of the important responsibilities of the Storeroom Manager is to prevent accidents from taking place within the store. Accidents can cause damage to materials or facilities, and injury to workers or even their death. It is necessary, therefore, that all precautions are taken to avoid accidents.

The Storeroom Manager should conduct a visual inspection of the store every day it is opened to confirm shelves are robust, materials safely stored, walls, locks, doors and window (with bars) are all in good order.

A fire extinguisher should be located in each store or in the corridor immediately outside if more appropriate. A review of the fire risks pertinent to the storeroom should be made before a choice of extinguisher is made - for example is there a risk of electrical fire which might make a water or foam extinguisher inappropriate? or is the storeroom a confined space which might make a CO<sub>2</sub> or powder extinguisher hazardous to the user?

Appropriate personal protection equipment (PPE) should be made available to all those entering the storeroom. Appropriate PPE should include at a minimum disposable dust masks and protective gloves. While the use of this equipment is not mandatory, it should be offered to all those entering and it should be made clear that it is their decision and risk whether to use it or not. Particular attention should be paid to the risk of inhaling anthrax spores from animal skins if they are stored at the same facility and these should be stored so as to reduce exposure to staff.

Appropriate signs should be put up around the storeroom reminding staff of PPE measures and clearly indicating the exit in case of emergency, that would remain visible e.g. power-loss.



### **3.2 TIER 2 STOREROOM**

It is acceptable for a Tier 2 storeroom to serve another purpose in addition to the ivory store (for example an armoury) providing all the standards are maintained for the entire storeroom.

If it serves more than one purpose then the ivory should be stored in a lockable container or section within the room.

#### **3.2 Gold Standard**

A Tier 2 storeroom should be a separate room (i.e. not shared with an armoury), meeting the minimum standards set out below.

#### **3.2.1 Location and General Security Objectives**

Where possible physical security should provide a layered approach, ensuring that there is not a single point that, if breached, leads to the exposure of the whole facility. Each layer of security should incorporate appropriate physical protection, with the goal of adhering to the “3 D Principle” of physical security management - Deter, Detect and Delay any intruder.

- a) The storeroom should be located within a secure area that is discrete and not normally accessed by the general public unless they have specific business to conduct there.
- b) Where members of the public are present they should not be made aware of the presence of the storeroom and their access should be monitored and controlled.
- c) Consideration should be given to threats posed by the external environment and a secure perimeter surrounding the storeroom itself should be maintained at all times.

#### **3.2.2 Perimeter Security**

It is expected that many Tier 2 storerooms are located within a compound comprising of other buildings and Tier 2 storerooms may be solitary, stand alone buildings, or it may be a room within the main building. The perimeter security outlined below would provide security for all the buildings contained within the compound.

- a) Around the immediate area of the storeroom itself, vegetation should be cut back or a general stand off area established to a distance of 3 metres to enable the outside walls of the storeroom to be observed easily.

### **3.2.2 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The compound surrounding the storeroom should be completely surrounded by a perimeter barrier of robust construction which presents an obstruction to individuals seeking to enter the compound and limits the likelihood that it could be climbed.
- b) The barrier should be kept free of vegetation which could act as a climbing aid, degrade the physical integrity of the barrier, or allow an individual to approach the barrier without being seen.

### **Perimeter Security – Vehicle access logs:**

- a) Any vehicles or people entering the facility should be challenged and their identity established and recorded in a logbook.
- b) Any unauthorized persons should be escorted at all times when in the vicinity of the storeroom, and if they have no reasonable business there, be asked to move away from the storeroom to a reasonable distance.

### **3.2.2 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) Where a perimeter has been established then any vehicle entry points should have gates or barriers so that entry can be restricted and checks made on any vehicles entering or leaving the compound.
- b) When not manned, these should be locked in place securely with padlocks and hasps meeting the “locks” standard below.
- c) Suitable measures should be put in place to prevent vehicles driving around the gates or barriers when they are not manned - for example concrete road blockers, ditch, vegetation.

### **3.2.4 Physical Security of Storeroom - Walls, Doors, Roof and Windows**

- a) The walls and roof of the storeroom should be constructed of a solid material which is resistant to any physical attack from the outside - for example concrete, brick or metal for the walls and concrete, metal or tile for the roof. A shipping container is a suitable option.
- b) Any openings to the storeroom other than the door (e.g. for ventilation or air conditioning units) should be less than 245 square centimetres in cross section and have a metal security grill fitted over the external side.
- c) There should be a single entry to the storeroom.
- d) The door should be kept closed and securely locked at all times when not in use.
- e) Doors and door frames should be constructed of a robust material and securely fitted into the building fabric.

## Guidelines for Ivory Management

- f) Any windows in the walls or door (including view holes) to the storeroom should be covered from the inside by an opaque material to prevent anyone outside seeing in. Additionally, they should be fitted with strongly constructed metal bars secured to the building fabric.

The storeroom may be contained within an existing secure room such as the armory. In such cases the following should be observed:

- g) Any ivory should be stored within a separate locked container or cage made of a robust material such as metal.

### 3.2.4 Gold Standard

In addition to the above, the following SOPs should be observed:

- a) The storeroom should be a separate room meeting the physical security standards outlined above.
- b) The door to the storeroom should be solid, with no glass, viewing holes or any gaps.
- c) The storeroom should have no windows.

### 3.2.5 Storeroom Door Locks

- a) The door to the storeroom should be locked with a minimum of 2 separate locks, each requiring a unique key.
- b) At least one should be a padlock fitted to a heavy duty steel hasp and staple (see below).



Hasp and staple lock



Closed shackle design lock



Straight shackle design lock

- c) Any padlocks should be a straight or closed shackle design and conform to the highest security standards. The following are appropriate standards for padlocks used for storerooms:
  - BSEN 12320 Grade 5 or 6
  - CEN Grade 5 or 6
  - Solid Secure Gold
  - LPS 1652 Level 4+
- d) Any padlocks that are exposed to the elements should additionally be weather proof to prevent corrosion or damage to the padlock.
- e) Hasp and staple should be made from heavy duty steel and welded to the metal door for maximum strength.
- f) Providing at least one padlock is used, then a locking mechanism integral to the door itself may be used as the second lock. In this case it must consist of a multi point locking system with a minimum of 3 locking points that come into place with solid steel bolts when the key

is turned. Locking points must be spaced evenly along the height of the door - top, middle and bottom.

### **3.2.5 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The door to the storeroom should be locked with a minimum of 3 separate locks each requiring a unique key.
- b) Any padlock locking points should be enclosed within a solid metal lock box to prevent tampering with or cutting the padlock itself (see image below).

### **3.2.6 Electricity Supply and Lighting**

It is accepted that in some cases the electricity supply to Tier 2 storerooms will be intermittent or no electricity supply will be present. As such we have developed the Tier 2 SOPs to provide adequate security for a Tier 2 site without the expectation of any power.

- a) A minimum of two high power torches (flashlights) will be located at the storeroom site. The Storeroom Manager is responsible for ensuring that these are kept fully charged, with adequate spare battery supplies. In the event of any security incident the torches can be used to examine the interior and exterior of the storeroom.

### **3.2.6 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) Storeroom should have a consistent power supply, including a backup generator where required.
- b) The interior of the storeroom should have its own lighting which clearly illuminates all areas evenly.

### **3.2.7 Alarms**

No alarm system is required or expected for Tier 2 storerooms.

- a) Should one be installed, it should follow the procedures outlined for Tier 1 storerooms.

### **3.2.8 CCTV**

No CCTV is required or expected for Tier 2 storerooms.

- a) Should one be installed, it should follow the procedures outlined for Tier 1 storerooms.

### **3.2.9 Guarding the Storeroom**

The following sets out the expected routines and performance standards for the guarding of a Tier 2 storeroom. The function of guarding is to protect the items stored within the storeroom. For the purposes of this SOP guards are responsible for all security outside of the storeroom walls; the Store-room Manager is responsible for all security inside the storeroom walls. At all times, should they have any concerns, or notice any unusual circumstance, the guards should notify the Storeroom Manager immediately.

- a) Guards will provide coverage during working hours and the facility will be securely locked up during hours of darkness.

## Guidelines for Ivory Management

- b) The storeroom must be locked down when the Storeroom Manager goes off duty and opened up again on their arrival for duty the next day.
- c) Each morning, after coming on duty, the Storeroom Manager should perform a patrol of the exterior at this time, noting any issues or changes from the night before and escalating them as appropriate.

### **A. Perimeter**

- d) Guards will conduct foot patrols around the inside of the compound perimeter during both daylight and hours of darkness at least once every hour.
- e) The time of the patrol should be varied so that no routine is established.
- f) Guards will ensure that the compound is suitably illuminated and that the security lights are in working order. Any faults should be reported to the facility manager.
- g) Guards will monitor the integrity of all physical barriers around the perimeter, and the physical integrity of the building where the storeroom is held. Any defects must be reported to the facility manager.
- h) Signs of perimeter breaches (e.g. scuff marks on wall, crushed vegetation, climbing aids against the outside of the perimeter) must be reported immediately to the Storeroom Manager.
- i) Guards will ensure that the external doors to the storeroom are secure by checking them during their routine patrol.

### **B. Immediate Storeroom**

- j) The Storeroom Manager should be issued with a list of Authorised Persons who are permitted to enter the storeroom.
- k) The Storeroom Manager should check the identity of all those entering, registering their names in an Entry Log.
- l) Anyone not on the Authorised Persons list should not be given access without the written permission of the Storeroom Supervisor.
- m) Bags and other equipment will not normally be allowed in to the storeroom. Where there is a legitimate need to bring a bag into the room then the Storeroom Manager should inspect the bags and any equipment being brought in, and again on their removal from the storeroom.
- n) The Storeroom Manager should conduct a pat down of all those departing the storeroom to ensure that they are not removing any items.
- o) Any ivory being moved out of the storeroom must be accompanied by an Ivory Movement Form (see below) on which its details are recorded. The Storeroom Manager should ensure that this form is complete and authorised appropriately before allowing the ivory to be removed.

### **3.2.10 Health and Safety / Fire**

One of the important responsibilities of the Storeroom Manager is to prevent accidents from taking place within the store. Accidents can cause damage to materials or facilities, and injury to workers or even their death. It is necessary, therefore, that all precautions are taken to avoid accidents.

## Guidelines for Ivory Management

The Storeroom Manager should conduct a visual inspection of the store every day it is opened to confirm shelves are robust, materials safely stored, walls, locks, doors and window (with bars) are all in good order.

A fire extinguisher should be located in each store or in the corridor immediately outside if more appropriate. A review of the fire risks pertinent to the storeroom should be made before a choice of extinguisher is made - for example is there a risk of electrical fire which might make a water or foam extinguisher inappropriate? or is the storeroom a confined space which might make a CO2 or powder extinguisher hazardous to the user?

Appropriate personal protection equipment (PPE) should be made available to all those entering the storeroom. While the use of this equipment is not mandatory, it should be offered to all those entering and made clear that it is their decision and risk whether to use it or not. Appropriate PPE should include at a minimum disposable dust masks and protective gloves.





### 3.3 TIER 3 STOREROOM

A Tier 3 storeroom is a temporary storeroom. At a minimum all storage facilities used for ivory should meet Tier 3 standards.

It is acceptable for a Tier 3 storeroom to serve another purpose in addition to the ivory store (for example an armoury) providing all the standards are maintained for the entire storeroom. If the storeroom serves more than one purpose then the ivory should be stored in a lockable container or section within the room. Another example of a T3 storeroom could be a lockable unit inside a secure office. These situations would probably arise when the area rarely seizes objects of value, and therefore the infrastructure has not been required. If seizures become frequent, a designated storeroom should be put in place.

The full security SOPs below are only required when ivory (or other items of value) are being stored there - security should be raised or lowered as appropriate when ivory is stored there. However, preparation is key, and it is important to ensure that basic security measures (locks, physical fabric of the building, etc.) are all up to the standard so that ivory can be accepted at any time. Other procedures such as guarding, access control, etc. can be relaxed when no ivory is present.

Key control of the ivory store or storage unit itself must be maintained at all times to ensure the integrity of the site.

Ivory should not be stored in Tier 3 storerooms for prolonged periods of time - the intention is to move it from a Tier 3 to a Tier 1 or 2 storeroom as soon as practical. At the very least, movements should be coordinated whenever one of the following factors are met:

- At a minimum all ivory should be moved out of a Tier 3 facility every 3 months.
- If a single Tier 3 storeroom contains more than  $x$  kg of ivory ( $x$  to be defined by the Wildlife Authority at HQ level).
- If a piece of ivory that is too large to be stored safely in the Tier 3 storeroom is recovered.

It is the responsibility of the Storeroom Manager to alert senior officers up the line management chain (see Section 4 on Management below) if any of the conditions above are breached. It is then the responsibility of the storeroom supervisor to arrange and coordinate the necessary moves.

### **3.3 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) A Tier 3 storeroom should be a separate room (i.e. not shared with an armoury), meeting the minimum standards set out below.

#### **3.3.1 Location and General Security Objectives**

Where possible physical security should provide a layered approach, ensuring that there is not a single point that, if breached, leads to the exposure of the whole facility. Each layer of security should incorporate appropriate physical protection, with the goal of adhering to the “3 D Principle” of physical security management - Deter, Detect and Delay any intruder.

- a) The storeroom should be located within a secure area that is discrete and not normally accessed by the general public unless they have specific business to conduct there.
- b) Where members of the public are present they should not be aware of the presence of the storeroom and their access should be monitored and controlled.
- c) Consideration should be given to threats posed by the external environment and a secure perimeter surrounding the storeroom itself should be maintained at all times.

#### **3.3.2 Perimeter Security**

It is expected that many Tier 3 facilities will not have their own perimeter or compound - Tier 3 storerooms may be solitary, stand alone buildings, or it may be a room within the main building.

- a) Around the immediate area of the storeroom itself, vegetation should be cut back or a general stand off area established to a distance of 3 metres to enable the outside walls of the storeroom to be observed easily.

#### **3.3.2 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) A perimeter should be established around the storeroom itself.
- b) While there may not be a continuous fence or barrier around the compound there should be clear demarkation - for example vegetation, vehicle checkpoints on road entrances, signs for **no access to unauthorised personnel** keep out, etc.
- c) While ivory is stored in the facility a higher level of security should be observed at the perimeter - for example guards patrolling or personnel challenging any unauthorised visitors.

#### **3.3.3 Perimeter Security – Vehicle access logs:**

- a) Any vehicles or people approaching the facility should be questioned and their identity established and recorded in a logbook.
- b) Any unauthorised should be escorted at all times when in the vicinity of the storeroom, and if they have no reasonable business there, be asked to move away from the storeroom to a reasonable distance.

### **3.3.3 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) Where a perimeter has been established then any vehicle entry points should have gates or barriers so that entry can be restricted and checks made on any vehicles entering or leaving the compound.
- b) When not manned, these should be locked in place securely with padlocks and hasps meeting the “locks” standard below.
- c) Suitable measures should be put in place to prevent vehicles driving around the gates or barriers when they are not manned - for example concrete road blockers, ditch, vegetation.

### **3.3.4 Physical Security of Storeroom - Walls, Doors, Roof and Windows**

- a) The walls and roof of the storeroom should be constructed of a solid material which is resistant to any physical attack from the outside - for example concrete, brick or metal for the walls and concrete, metal or tile for the roof. A shipping container is a suitable option.
- b) Any openings to the storeroom other than the door (e.g. for ventilation or air conditioning units) should be less than 245 square centimetres in cross section and have a metal security grill fitted over the external side.
- c) There should be a single entry to the storeroom.
- d) The door should be kept closed and securely locked at all times when not in use.
- e) Doors and door frames should be constructed of a robust material and securely fitted into the building fabric.
- f) Any windows in the walls or door (including view holes) to the storeroom should be covered from the inside by an opaque material to prevent anyone outside seeing in. Additionally, they should be fitted with strongly constructed metal bars secured to the building fabric.

The storeroom may be contained within an existing secure room such as the armoury. In such cases the following should be observed:

- g) Any ivory should be stored within a separate locked container or cage made of a robust material such as metal, and the container should be fixed to the infrastructure of the room.
- h) In the event that a particularly large piece of ivory is seized or recovered and it cannot fit inside the container then it may be stored outside of the container, but within the secure room. On such occasions the ivory piece must be moved to an appropriate facility for storage within 24 hours. The only exception to this rule is for large pieces of ivory being stored in a Tier 3 storeroom for the purposes of a criminal prosecution. In such cases a senior official at the Tier 3 storeroom will require to provide a signed authorisation for the longer term storage - including assurances that appropriate additional security measures will be put in place to safe guard the ivory held outside the locked container.

### 3.3.4 Gold Standard

In addition to the above, the following SOPs should be observed:

- a) The storeroom should be a separate room meeting the physical security standards outlined above.
- b) The door to the storeroom should be solid, with no glass, viewing holes or any gaps.
- c) The storeroom should have no windows.

### 3.3.5 Locks

- a) The door to the storeroom should be locked with a minimum of 2 separate locks, each requiring a unique key.
- b) At least one should be a padlock fitted to a heavy duty steel hasp and staple (see below).



Hasp and staple lock



Closed shackle design lock



Straight shackle design lock

- c) Any padlocks should be a straight or closed shackle design and conform to the highest security standards. The following are appropriate standards for padlocks used for storerooms:
  - BSEN 12320 Grade 5 or 6
  - CEN Grade 5 or 6
  - Solid Secure Gold
  - LPS 1652 Level 4+
- d) Any padlocks that are exposed to the elements should additionally be weather proof to prevent corrosion or damage to the padlock.
- e) Hasp and staple should be made from heavy duty steel and welded to the metal door for maximum strength.
- f) Providing at least one padlock is used, then a locking mechanism integral to the door itself may be used as the second lock. In this case it must consist of a multi point locking system with a minimum of 3 locking points that come into place with solid steel bolts when the key is turned. Locking points must be spaced evenly along the height of the door - top, middle and bottom.

### **3.3.5 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) The door to the storeroom should be locked with a minimum of 3 separate locks each requiring a unique key.
- b) Any padlock locking points should be enclosed within a solid metal lock box to prevent tampering with or cutting the padlock itself.

### **3.3.6 Electricity Supply and Lighting**

It is accepted that in some cases the electricity supply to Tier 3 storerooms will be intermittent or no electricity supply will be present. As such we have developed the Tier 3 SOPs to provide adequate security for a Tier 3 site without the expectation of any power.

A minimum of two high power torches (flashlights) will be located at the storeroom site. The Storeroom Manager is responsible for ensuring that these are kept fully charged, with adequate spare battery supplies. In the event of any security incident the torches can be used to examine the interior and exterior of the storeroom.

### **3.3.6 Gold Standard**

In addition to the above, the following SOPs should be observed:

- a) Storeroom should have a consistent power supply, including a backup generator where required.
- b) The interior of the storeroom should have its own lighting which clearly illuminates all areas evenly.

### **3.3.7 Alarms**

No alarm system is required or expected for Tier 3 storerooms. Should one be installed, it should follow the procedures outlined for Tier 1 storerooms.

### **3.3.8 CCTV**

No CCTV is required or expected for Tier 3 storerooms. Should one be installed, it should follow the procedures outlined for Tier 1 storerooms.

### **3.3.9 Guards**

The following sets out the expected routines and performance standards for the person guarding of a Tier 3 storeroom. The function of guarding is to protect the items stored within the storeroom. For the purposes of this SOP, guards are responsible for all security outside of the storeroom walls; the Storeroom Manager is responsible for all security inside the storeroom walls. At all times, should they have any concerns, or notice any unusual circumstance, the guards should notify the Storeroom Manager immediately.

- a) Guards will provide coverage during working hours when ivory is stored at the facility, and the facility will be securely locked up during hours of darkness.
- b) The storeroom must be locked down when the Storeroom Manager goes off duty and opened up again on their arrival for duty the next day.

## Guidelines for Ivory Management

- c) Each morning, after coming on duty, the Storeroom Manager should perform a patrol of the exterior at this time, noting any issues or changes from the night before and escalating them as appropriate.

### **A. Perimeter**

- a) Guards will conduct foot patrols around the inside of the compound perimeter during both daylight and hours of darkness at least once every hour.
- b) The time of the patrol should be varied so that no routine is established.
- c) Guards will ensure that the compound is suitably illuminated and that the security lights are in working order. Any faults should be reported to the facility manager.
- d) Guards will monitor the integrity of all physical barriers around the perimeter, and the physical integrity of the building where the storeroom is held. Any defects must be reported to the facility manager.
- e) Signs of perimeter breaches (e.g. scuff marks on wall, crushed vegetation, climbing aids against the outside of the perimeter) must be reported immediately to the Storeroom Manager.
- f) Guards will ensure that the external doors to the storeroom are secure by checking them during their routine patrol.

### **B. Immediate Storeroom**

- a) The Storeroom Manager should be issued with a list of Authorised Persons who are permitted to enter the storeroom.
- b) The Storeroom Manager should check the identity of all those entering, registering their names in an Entry Log.
- c) Anyone not on the Authorised Persons list should not be given access without the written permission of the storeroom supervisor.
- d) Bags and other equipment will not normally be allowed in to the storeroom. Where there is a legitimate need to bring a bag into the room then the Storeroom Manager should inspect the bags and any equipment being brought in, and again on their removal from the storeroom.
- e) The Storeroom Manager should conduct a pat down of all those departing the storeroom to ensure that they are not removing any items.
- f) Any ivory being moved out of the storeroom must be accompanied by a Ivory Movement Form (see below) on which its details are recorded. The Storeroom Manager should ensure that this form is complete and authorised appropriately before allowing the ivory to be removed.

### **3.3.10 Health and Safety / Fire**

One of the important responsibilities of the Storeroom Manager is to prevent accidents from taking place within the store. Accidents can cause damage to materials or facilities, and injury to workers or even their death. It is necessary, therefore, that all precautions are taken to avoid accidents.

## Guidelines for Ivory Management

The Storeroom Manager should conduct a visual inspection of the store every day it is opened to confirm shelves are robust, materials safely stored, walls, locks, doors and window (with bars) are all in good order.

A fire extinguisher should be located in each store or in the corridor immediately outside if more appropriate. A review of the fire risks pertinent to the storeroom should be made before a choice of extinguisher is made - for example is there a risk of electrical fire which might make a water or foam extinguisher inappropriate? or is the storeroom a confined space which might make a CO<sub>2</sub> or powder extinguisher hazardous to the user?

Appropriate personal protection equipment should be made available to all those entering the storeroom. While the use of this equipment is not mandatory, it should be offered to all those entering and made clear that it is their decision and risk whether to use it or not. Appropriate PPE should include at a minimum disposable dust masks and protective gloves.



### 3.4 TIER 4 STORAGE IN THE FIELD

Most pieces of ivory are initially recovered in one of the following circumstances:

- Animal carcasses discovered in the field by wildlife law enforcement officials where the animal has died of natural or unknown causes, or has been illegally killed.
- Animal carcasses discovered in the field by non-law enforcement officials including: local communities, community rangers, researchers or tourist vehicles.
- Ivory seized from poachers or traffickers either in the field, or during transit within the borders of country.
- Ivory seized from traffickers at ports of entry/exit to/from the country e.g. airport, ports, road borders.

The following SOP provides baseline guidance on how to manage the procedure around the recovery of such ivory. For all carcasses found, it is suggested that the Monitoring Illegal Killing of Elephants (MIKE) protocols on data collection relating to dead elephants should be observed. For seizures the Elephant Trade Information System (ETIS) protocols need to be followed as well as internal procedures <https://cites.org/eng/prog/mike/>.

#### 3.4.1 Procedures to be Established

- It is advised that Wildlife Authorities ensure that they are complying with evidential handling procedures according to their country regulations and laws and in collaboration with other law enforcement agencies. This will ensure that all seized ivory is properly dealt with to evidential standards so it could be used in the prosecution of poachers/traffickers.
- It is recommended that the Wildlife Authority agrees an MoU with police, customs authority and any other Law Enforcement Agency, to set out roles and responsibilities concerning seized ivory and, ensuring that the Wildlife Authority is notified of any new ivory seizures.
- Every Wildlife Authority should establish SOPs for the handling of any persons apprehended along with ivory recovery in the field (suspected poachers or traffickers). This should include Rules of Engagement with poachers/traffickers, safe custody of prisoners, legal parameters of detention, and engagement/hand over with Law Enforcement Agencies.



## Guidelines for Ivory Management

- Each Wildlife Authority should create a policy for engagement with the local community, to establish clear guidelines on how and when local people should alert the Wildlife Authority to the presence of ivory discovered by their community. This should include engagement with senior and respected community figures, and an education/outreach programme with the community to educate them about their roles and responsibilities regarding discovered ivory. All guidance will have to observe local laws and cultural norms and endeavour to educate the local community about those laws.

### **3.4.2 Discovery of Ivory in the Field by Another Authority or Local Community**

In the case of ivory collected by another legal authority (for example a Law Enforcement Agency) or by members of the local community, then an officer from the Wildlife Authority should endeavour to visit the storage site of the ivory at the earliest possible date to measure, mark and record the ivory, and enter it into the national database.

How that ivory is handled beyond this point should be in the agreed MoU with the appropriate Law Enforcement Agency or local community.

### **3.4.3 Discovery of ivory in the Field by the Wildlife Authority**

#### **A. Secure the Scene**

- *If necessary* A perimeter around the carcass or find of ivory should be immediately established and only authorised officers should be permitted to enter.
- *If necessary* Officers should take immediate action to prevent the find and any associated evidence from being contaminated or destroyed including by scavenging animals or the elements (wind, rain, etc.).
- At least two officers should endeavour to remain with the ivory find at all times until it is transported to a storeroom. Officers should only leave the scene if they are in danger, or in order to report the find to the local Wildlife Authority. When possible they should return to the scene and await contact from the Wildlife Authority HQ.
- The names and official identification of all officers entering the scene should be recorded, along with the time and date of their presence at the scene.

#### **B. Record and Report the Find**

The officers discovering the ivory find should record the details of the scene, including:

- I. WHO - Names and official identification of all officers at the scene
- II. WHAT - Details of the ivory found (including rough measurements or estimates of ivory found).
- III. WHEN - Date and time of discovery
- IV. WHERE - Exact location of find
- V. HOW - A brief description of how the ivory was found and whether it is recovered, poached, natural, etc.

The record should be made in a notebook or system they are using e.g. SMART; photographs should be taken to accompany the record.

The find should be immediately reported to the Headquarters Wildlife Authority office so that an investigation can be carried out. The Wildlife Authority will advise the officers what to do next and whether they should wait with the ivory for support from HQ, or attempt to transport it to a storeroom themselves.

## Guidelines for Ivory Management

Any local procedures and laws should be followed regarding the notification of police or other Law Enforcement Agencies about the find so that it can be recorded properly.

### **C. Next Steps**

- A thorough investigation of the find should be made by the appropriate authority and the MIKE procedures and processes followed.
- As soon as possible following the scene of incident investigation, all ivory should be removed from the scene and transported to the nearest appropriate Storeroom. All efforts should be made to secure any recovered ivory in a storeroom within 24 hours of discovery.
- Gold Standard - all Wildlife Authority offices should have an officer present who is trained in scene of incident investigation and MIKE processes. All Wildlife Authority offices should establish MOUs and SOPs with Law Enforcement Agencies so that any criminal activity is formally recorded and evidence appropriately gathered and processed.



## 4. Storeroom Management SOPs

Except where specifically noted below, the same standards of storeroom management should be achieved in every tier, and any Gold Standards should be a goal for Tier 1 and 2 storerooms.

Following these standards will result in robust security of the stockpiles and enable accurate and transparent accounting of them at any time, reducing the workload and pressure on staff.

### 4.1 ROLES AND RESPONSIBILITIES

#### 4.1.1 General Management Structure

Management of the storeroom will be clearly established and the roles of all those working at the storeroom will be clearly defined and understood.

- A **National Storeroom Supervisor (NSS)** will be appointed who will have ultimate responsibility for all storerooms and their contents.
- Each storeroom will have a **Storeroom Supervisor** who oversees the managers and coordinates with the NSS (Note: the Storeroom Supervisor is expected to have other roles)
- One or more **Storeroom Managers** will be appointed to oversee the day to day running of a storeroom.
- It is possible for the National Storeroom Supervisor to also be the Storeroom Supervisor for Tier 1 providing there is at least one other manager appointed to that store (i.e. a minimum of 2 people should have responsibility for each storeroom).
- Once appointed, the Storeroom Supervisor and Storeroom Managers are expected to remain in their positions for a significant period and not moved from their duties except in an emergency.
- At least one Storeroom Supervisor/Manager must remain in attendance whenever the storeroom is open.

A summary of the role and responsibilities of the Storeroom Supervisor and Storeroom Manager are included in Appendix 4 and 5.

#### 4.1.1 Gold Standard

- Storeroom Supervisors and Managers should remain in their posts for a minimum of 2 years.
- Storeroom Supervisors and Managers should be offered professional training for their roles. This will ensure that they are recognised for their skills and valued.

#### 4.1.2 Line Management Structure and National Management

- A clear line management structure will be established between storerooms, up to a **National Storeroom Supervisor (NSS)** who has responsibility for ensuring that all storerooms have appropriate persons appointed to management roles and that they are following the SOPs.
- To ensure that the NSS can maintain oversight of the storerooms regular communication is required.
- Each Storeroom Supervisor will send the NSS a report on a quarterly basis, detailing:
  - Total amount of ivory stored (number of pieces and weight)
  - Capacity of the storeroom and whether any capacity issues are likely in the near future
  - Summary of all moves into and out of the storeroom over the last quarter
  - Details of any security incidents that have occurred
  - Any issues with the storeroom, or requirements for repairs, additional infrastructure etc
  - Any movement of storeroom staff arriving / departing their posts
- Any request for movement of ivory due to capacity issues should be highlighted up the management chain, copying in the NSS.

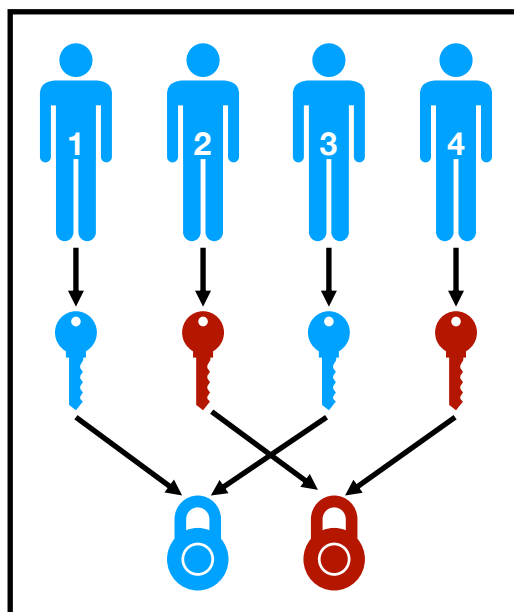
## 4.2 KEY CONTROL

As stated in section 3, there should have there should be a minimum of 2 locks to the storeroom door.

- a) All keys to the storeroom should be individually numbered with an engraving or stamp on the metal of the key itself, and named persons must be made responsible for each key.
- b) A master list of key numbers and associated key holders for all storerooms should be maintained by the National Storeroom Supervisor. The Storeroom Supervisors should have list of key holders for their individual storeroom.
- c) Other than keys issued to authorised key holders, no duplicate keys are permitted.
- d) If a key is lost it should be reported to the Storeroom Manager (or Supervisor) immediately. The Storeroom Manager should conduct a full enquiry and a security incident report (see below) should be completed. The lock must also be changed at the earliest opportunity and at least within 24 hours of the reported loss - duplicate keys should not be made.

## Guidelines for Ivory Management

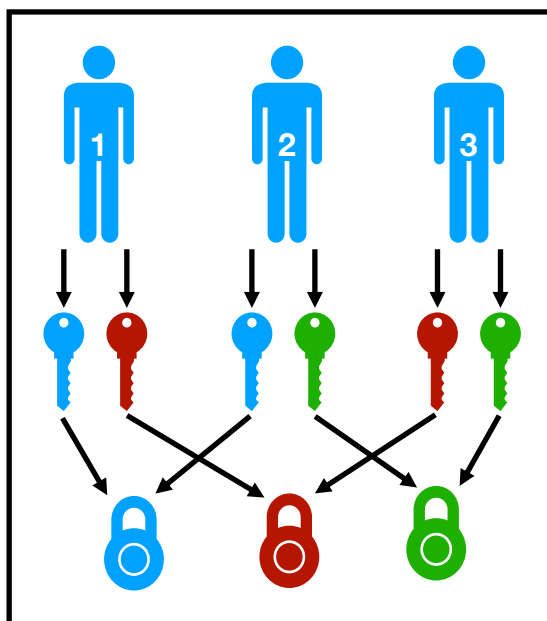
- e) Keys can either be carried on the nominated key holders at all times or stored in separate combination locked safes located within a restricted area (no two keys should be in the same safe).
- f) If the keys are stored then the following standards should be followed:
  - i. The safe combination should be given only to authorised key holders and the Store-room Supervisor and Storeroom Manager - not to the guards manning the location where the safe is located. The combination should be changed every time an authorised person moves on from their role, or at least once a year.
  - ii. When collecting or depositing keys from the safe, entries should be made in a register to confirm who has taken the key, along with the date and time. The register should be counter signed by a guard to confirm that all details entered are correct and that the key holder has taken a key that is assigned to them. The guard must also make a visual check of all other storeroom keys to confirm they are still in place. The Storeroom Manager should review this register each day the storeroom is opened to confirm that all keys are accounted for.
- g) Key control should be such that no single individual can gain access to the storeroom (unless in the case where a biometric lock is used since it will clearly identify who gained access to the storeroom at any time). E.g. different people are key holders for different padlocks on the main door for the ivory storeroom.
- h) No single person should be given full responsibility for any single key: a rota system should be implemented to enable key holders to take breaks from their duties - including periods of leave - to ensure their physical and psychological well being.
- i) The key holder rota should be managed in such a way that the ivory store is always accessible during working hours and there is no need to use another area as a “temporary” store.
- j) It should be recognised that being a key holder comes with significant responsibility and psychological pressure. The Storeroom Supervisor should ensure that all key holders are suitable for the role, fairly treated and not put under undue pressure.



Example 1: in the case of 2 locks, each authorised key holder should have 1 key only so that 2 have to be present to open the door. There should be a minimum of 4 authorised key holders in total (2 people

## Guidelines for Ivory Management

with a key to lock 1 and 2 with a key to lock 2) and a shift/leave rota worked out so that the store can be opened on any day.



Example 2: in the case of 3 locks, each authorised person has 2 keys - then a minimum of 3 authorised key holders is required, each holding 2 keys to ensure rota/leave system works

Note for T3: If the ivory is stored in a cupboard or trunk within an office – the key control should relate to the locks for the cupboard or trunks, and not to the office itself.

### 4.2.2 Access Control Tier 1, 2 and 3 Storerooms – Authorised persons

- Access to the storeroom should be controlled by the Storeroom Supervisor who will maintain a list of all those permitted access to the storeroom. As well as the key holders, it is likely that this list will include other people who require access to the storeroom on occasion - for example to perform maintenance, to move ivory, conduct a stock check, etc.
- Day to day access is maintained by the Storeroom Manager who is responsible for checking that all those granted access to the storeroom are on the authorised person list. Additionally any guards who are required to manage access will also have sight of this list.
- This list must be kept up to date and reviewed on a monthly basis to ensure that all named on it still require access.
- Only those on the authorised persons list are permitted to enter the storeroom. If there is a requirement for temporary access to be granted to a visitor this must be approved, in writing, by the storeroom supervisor. A temporary visitor's access will usually be for 1 day and must be for no longer than 1 week before it requires a further written approval from the storeroom supervisor.
- Temporary visitors must be accompanied by an authorised person at all times while in the storeroom.

#### For Tiers 1 and 2 only:

- Staff should be encouraged to challenge anyone in the storeroom who does not have permission from the Supervisor.

#### **4.2.4 Gold Standard Tier 1 and 2 Storerooms**

- a) An electronic access control system should be installed in the storeroom and all those entering must make use of it. This system can make use of chipped ID cards, PIN, or biometrics. In any case a clearly recognised signal (sound/light) should be given by the entry system to confirm that the person is authorised to enter.
- b) Those logged on the access system should correspond to the list maintained by the Storeroom Supervisor, and the same process for adding and removing people from the list should be in place.
- c) The advantage of an electronic system is that a clear record of all those entering and leaving the storeroom is maintained, and the electronic system is less prone to user error - for example a guard permitting access to a familiar face, who may have been removed from the authorised person list.
- d) If an electronic access control system is used then steps should be taken to ensure that it has been installed by a reputable security system supplier and conforms to industry standards. A review of who has access to this system should be made to ensure that it cannot be overridden.
- e) The access control system must be regularly maintained - in particular any leavers must immediately be removed from the system. If access cards or ID is used to gain access then a process to report any loss or theft of the cards needs to be in place, and cards should be deactivated immediately if lost.

### **4.3 STOREROOM ORGANISATION**

- a) The storeroom/unit must be kept clean and well organised at all times. This is the responsibility of the Storeroom Manager on duty.
- b) All materials will be stored in an appropriate manner that enables individual pieces (or collections of pieces in the case of ivory smaller than 20cm in length) to be easily identified and retrieved.
- c) Each storeroom should be fitted with racks, shelves or other type of storage units to enable the ivory to be stored in an organised manner. No ivory should be placed directly on the floor (unless too large for racks).
- d) Separate storage units or shelves should be used for each of the following:
  - Ivory that is seized and ivory that has been recovered.
  - Ivory that is in long term storage and ivory that is still involved in ongoing legal cases, or may need to be moved again for any reason. This could be separate rooms or divided up within the same room.
  - Ivory that is raw and ivory that is worked.
  - Different animal products (i.e. ivory should be stored separately from rhino horn, pangolin scales, etc.)
- e) Large pieces of ivory (over 20cm) should be marked and stored individually.
- f) Collections of smaller pieces of ivory should be stored together under their single CITES

marking in a robust bag or container sealed with a tamper proof seal.

- g) No cameras or cell phones with cameras permitted in the storeroom without written permission of the authorising officer. The exception being any camera used to record the ivory for inventory purposes.
- h) No bags and other equipment are permitted in the storeroom without written permission from the authorising officer. Where there is a legitimate need to bring a bag into the storeroom it should be inspected when being brought in, and again on being removed.
- i) Equipment required for the weighing, marking and recording of ivory should be kept on shelves within the storeroom or in a secure room in the near vicinity.

## 4.4 INVENTORY AND RECORD KEEPING

### 4.4.1. Record Keeping Overview

It is of great importance that records on each piece of ivory and each storeroom are maintained and kept up to date and are available for the Storeroom Supervisor, or other appropriate individuals, to review at any time. The records provide accountability, chain of custody and can be supporting evidence in wildlife crime cases.

- a) It is the responsibility of the Storeroom Manager to keep the records up to date and complete.
- b) Records required include:
  - a. Access Logs. A record of who has accessed the storeroom, when, and why.
  - b. Check-in or Check-out Items. Any movement of ivory in or out of the storeroom should be recorded in paper format at the storeroom and also on the Stockpile Management System (SMS). This is part of the Chain of custody records.
  - c. Inventory of items within the storeroom (see 3.5.5). A record of all ivory stored should be maintained in both an electronic and paper format. The paper format should not be easily duplicated. E.g. carbon copy paper, with page numbers, or a ledger book.
  - d. Storeroom Audits and Compliance checks. Records of regular checks on the storeroom infrastructure and maintenance as well as audits of the items.
- c) Electronic records should be backed up on at least a weekly basis, preferably to a secure server on the Cloud.
- d) Electronic records should be password protected, and passwords should meet minimum security standards and be changed at least every 6 months.
- e) Access to records and passwords (paper and electronic) should be limited to authorised persons.
- f) The Storeroom Supervisor is responsible for maintaining a list of people authorised to have access to the records.
- g) The Storeroom Manager is responsible for facilitating access to the paper records for authorised personnel.
- h) A regular monitoring and/or audit system is in place to review records and ensure information is being properly recorded. This must be done by someone who is not actively recording the information.



#### 4.4.2 Access logs

Each person accessing the storeroom/unit should sign the Access log. This can be a digital or paper register.

Information should include:

- Date of access
- Time of access and Time of departure
- Name(s)
- Reason for accessing the storeroom.
- Signature of Person(s).

#### 4.4.3 Checking in Items

When new items arrive at the storeroom, the Storeroom Manager needs to sign the items in and the storeroom assumes the custody of the items. Clearly established roles and responsibilities for those “checking in” the ivory, including authorisations and counter signatures are required.

Clear procedures for accepting ivory from Wildlife Officers, from a different storeroom and from a third party organisation (for example an LEA where ivory is being returned following a court case or from local community) should be established.

- A Record should be completed to log the arrival of the new items. The record could be a ledger/paper (carbon paper for duplicates) as well as digital. It is advised to have both digital and paper records.
- The record should include the following information.
  - Time and Date of reception of the ivory
  - Name and position of the person handing over ivory
  - Name and position of person receiving ivory (Storeroom Manager/Supervisor)
  - Source of the ivory (Seizure, recovery, PAC, etc).
  - Number of pieces and type of pieces (for example Full Tusks x 4, worked pieces x 10).
  - Details on each piece received – Type, weight.
  - Signatures of the receiving and deposing parties.
- **Transferred Items:** If the items are being transferred from a different storeroom, then the ivory should have arrived with an Ivory Movement Form which details place of origin, number of pieces, weight, source, Name of person relinquishing the ivory, name of the person in charge during the transit. The form should be checked, and the Storeroom Manager/Supervisor sign the received part of the form.

#### 4.4.4 Inventory

If the Item has arrived in a storeroom for the first time in Government custody (i.e. after a seizure or recovery), it will need to be inventoried digitally (and paper).

An inventory is a list of what items are in the storeroom, a central inventory at the Headquarters will have a list on what each storeroom holds. The Inventory should be kept up to date – as new items

arrive they should be inventoried within 24 hour. Adding items to the inventory involves: marking, weighing, measuring and photographing the item.

### **4.4.4a. Ivory Marking**

Ivory needs to be marked with a unique number to identify each piece or group of pieces. Once an items is provided with an ID number, this number should never change.

The CITES Secretariat 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).” (Res 10:10 RevCop17). (This denotes Kenya/year 2000/serial number 127/14kgs).

The ID code can also include the Department or the region the item originated from. For example: KE/19/POL/MO/127/14 (this denotes Kenya/2019/Police/Mombasa/serial number 127/weight 14kg).

- The Format of the ID and provision of the serial number needs to be established and advised to all Wildlife Authority offices.
- The method for allocating the serial number needs to be determined to prevent duplicate serial numbers. Either the Headquarters central office can allocate serial numbers for each item as they arrive. Or If the storeroom name is included in the ID code, the Store-room Manager can allocate serial number.
- Pieces can be marked with a permanent marker pen, or punch stamp and dye.
- The code should be written clearly directly on the piece or on the bag for smaller items.
- Once it has been marked, the piece does not need to get marked again, the code should never change.
- Protocol needs to be agreed between Wildlife Authorities and the Police/Judiciary regarding when ivory pieces can be permanently marked. Some jurisdictions do not allow seized items to be permanently marked until a court case has concluded and the defendant has been convicted so the ivory becomes the possession of the Government. In such cases, ivory should still be inventoried and given an ID code, but the code should be attached to the ivory using a non-permanent method until conclusion of the court case when it can be permanently marked if it becomes Government property.

### **4.4.4b. Measuring Ivory**

To be able to distinguish a piece ivory from others it needs to be weighed and measured, as per CITES requirements. These measurements should be recorded in the inventory (digital and paper).

The following data is required:

- For Full tusks: weight (kg), outside curve length (cm), inside curve length (cm), circumference (cm), photo.
- For Partial tusks: weight (kg), photo
- For Worked ivory: number of pieces, weight (kg), type of piece, photo.

### For Raw Ivory (whole tusks)

#### Outside curve

Using a measuring tape, take the measurement from the tip to the end on the outside curve. Measuring to the nearest half centimeter (cm) for example 10.5cm



#### Inside curve length

Using a measuring tape, take the measurement from the tip straight to the end on the inside curve. Measuring to the nearest half centimeter (cm) for example 9.2cm



#### Circumference

Using a measuring tape, take the measurement around the widest part of the tusk. Measuring to the nearest half centimeter (cm) for example 5.1cm



#### Weight

Using either a digital or spring scale, place the tusk on ensuring the tusk is not touching the table/floor. Take the weight to the 2 decimal places (kg) for example 5.32kg



#### Photograph

Place an object of known size e.g. pen next to the tusk to provide a scale. Ensure the ID is visible and photograph the piece ensuring all of it is within the photo.



### For large pieces of raw ivory or worked ivory

- Weigh the item to nearest 2 decimal places.
- No other measurements are required.
- Mark the item with the inventory code.
- Take a photo (with a pen for scale and the ID visible).

### For small pieces of raw ivory and worked ivory

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- For smaller items that are from the same seizure you can group into similar items (e.g. beads, tips, blocks).
- Count the number of items.
- Place in a bag or sack and seal appropriately e.g. with tape/staples.
- Weigh the bag.
- Mark the bag with the ID code.
- Take a photograph.



### 4.4.5 Checking out Items

When ivory is removed from the storeroom for any reason including: permanent transfer to a different storeroom, temporarily taken to court as evidence or temporarily used for a demonstration, each item needs to be signed out. This will be covered in the Ivory Movement Form in Section 5.

For the digital inventory: An item should not need to be digitally inventoried when moving storeroom, it needs to be checked out of the original storeroom and checked into the new one. This will move the digital file to the new storeroom. The movement will be recorded and the items history of when it was moved saved.

### 4.4.6 Sampling Ivory for DNA

CITES “URGES Parties to collect samples from large-scale ivory seizures (i.e. a seizure of 500kg or more) that takes 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;”

The protocol for sampling ivory should be provided by the laboratory the country uses for analysis, as each laboratory has differing requirements.

For reference information see: UNODC: Guidelines on Methods and Procedures for Ivory Sampling and Laboratory Analysis : - see pages 19-25 which outlines the protocol for sampling Ivory.

## 4.5 INTERNAL INSPECTION OF A STOREROOM

It is understood that some storerooms may only be opened occasionally for the addition or removal of ivory. It is therefore important that regular checks of the interior of the storeroom are made to ensure that all security measures are functioning and that the contents remain secure. Leaving the storeroom unchecked for a prolonged period is not acceptable and if ivory goes missing during such a period it may not be possible to properly investigate the loss.

All storerooms should therefore be opened for an interior inspection at **least twice a month**.

- These inspections should occur at random times during the month so that no regular pattern of storeroom opening is observed.

- The inspections should be carried out by the Storeroom Manager and the results reported to the Storeroom Supervisor.
- If there is any suggestion that the storeroom has been tampered with, or any security incident has been reported, then the storeroom must be opened immediately and an interior inspection carried out.

## **4.6 AUDITING IVORY STOCK**

### **4.6.1 Annual Audit**

An audit is a verification that the data records (digital and/or paper) match what is held within the storeroom. As per CITES procedures, an updated inventory of ivory should be sent to the CITES Secretariat by 28th February each year (Resolution 10:10).

To comply with this, an accurate inventory should be maintained and updated throughout the year, and immediately before it is submitted to CITES an internal audit of stocked ivory should be made.

- a) This audit should consist of a random selection of 10% of the total ivory stock held. The protocol for the annual audit should be as follows:

10% of the total of all items are randomly selected from shelves and it is confirmed that data on those items is accurately held in both the digital and paper records. Randomised pieces should be selected from different shelves, front and back, top and lower shelves.

10% of the total of all digital records are randomly selected and it is confirmed that identical data is also held on paper records, and that the piece can be physically located. Randomization can be achieved by using randomly generated integers (e.g Random.org) and using the corresponding line number to identify which digital piece to verify against paper and physical.

10% of the total of all paper records are randomly selected and it is confirmed that identical data is also held on digital records, and that the piece can be physically located. Randomization can be achieved by using randomly generated integers (e.g Random.org) and using the corresponding entry number to identify which paper piece to verify against digital and physical.

Any discrepancies should be reported to HQ and investigated.

At the discretion of HQ, any significant, or continued discrepancies can require a full piece count of the items or a complete audit of the storeroom.

### **4.6.2 Spot Check Audit**

In addition to the annual audit, random spot check audits should be conducted on all storerooms and records, at least once during the year. The protocol for the spot check audit should be as follows:

- a) The time and date of the spot check should be varied and decided by an appropriate senior person in the Wildlife Authority.
- b) The spot check should be carried out by the storeroom supervisor and minimal notice should be given to the Storeroom Manager (a maximum 1 hour) to ensure a genuine result.

3 items are randomly selected from shelves and it is confirmed that data on those items is accurately held in both the digital and paper records.

3 items are randomly selected from digital records and it is confirmed that identical data is also held on paper records, and that the piece can be physically located.

3 items are randomly selected from paper records and it is confirmed that identical data is also held on digital records, and that the piece can be physically located.

- c) The spot check should also include a visual inspection of the store to ensure it meets all the SOPs above.
- d) Paper and electronic records should be checked to ensure information is properly recorded and books have not been tampered with, e.g. pages missing, etc.

### **4.7 EMERGENCY PROCEDURES**

Each storeroom should have emergency procedures in place to ensure that any breach in security is immediately reported to management, and a procedure for recording breaches or other concerns should be established. Each of these will include a “lessons learned” process. Examples of incidents would include - lost ivory, injury or accident in the storeroom, damage to storeroom (walls, door, shelves, storage units, etc.), damage to stock, loss of keys, change of locks, suspicious activity. The following emergency procedures should be in place:

- a) An escalation procedure to follow in the event that there is any serious security breach at a storeroom, or if any ivory goes missing either in a storeroom or in transit. Appendix 2
- b) An Incident Reporting procedure to ensure that any incidents concerning the security of ivory are recorded and appropriately reported. Appendix 1
- c) A Whistleblowing procedure to ensure that each Wildlife Authority has a means for staff to raise their concerns about any element of the security of ivory storage. Appendix 3.

### **4.8 RECOMMENDATIONS FOR STORAGE OF IVORY IN CRIMINAL CASES**

- It is recommended that the local Wildlife Authority should take charge of all recovered or seized ivory as soon as practical and if in accordance with local laws. Wildlife Authorities will have greater experience of handling ivory, and if adhering to the best practice outlined in this document, will have more appropriate storage facilities for the ivory and also maintain the national database for ivory. Moreover, the centralisation of storage in the hands of a single entity will decrease the risk of ivory being misplaced, lost or stolen. However, it is recognised and accepted that other agencies will need to hold ivory for specific purposes and periods of time.
- Seized ivory being used for a criminal prosecution will, on many occasions, require to be presented at court as evidence (an exhibit). Trials often take place in the locality where the ivory was seized, meaning there might not be a suitable Wildlife Authority storeroom nearby. These exhibits will often have to be presented at court for many days in a row, and their regular movement to and from the court would place an unnecessary burden on the Wildlife Authority if they were to manage it. Moreover, the police or other LEAs are used to handling exhibits and have more expertise in this process, minimising the risk of a break in the evidential chain which might result in a mistrial or suspects escaping justice.
- It is recommended that the Wildlife Authority works with the LEAs and courts to ensure that the Gold Standard SOPs are put in place for any storage facility outside of their control. In these

## Guidelines for Ivory Management

cases, depending on the volume of ivory being stored, the Tier 3 storeroom SOPs may be sufficient, and an extension of the usual 1 week storage limit for Tier 3 stores may be permissible.

- It is recommended that each Wildlife Authority agrees an MoU with police, customs authority, any other Law Enforcement Agency and the courts, to set out roles and responsibilities concerning seized ivory. In particular confirmation issues of chain of custody, ivory marking and that ivory will be passed to the Wildlife Authority once the court case is concluded.
- Wildlife Authorities must work to ensure that their own handling of ivory is done to the highest evidential standards which will ensure that any ivory seized by them can be used by LEAs to secure prosecutions, and will encourage greater trust between Wildlife Authorities and LEAs which in turn will encourage LEAs to hand over any ivory in their possession in a timely manner.



## 5. Detailed SOPs for Movement of Ivory

One of the goals of the Gold Standards is to ensure a constant, clearly evidenced chain of possession for all ivory from its point of collection to date. A key part of this is the introduction of an Ivory Movement Form (IMF) and Journey Management Plan (JMP) for any movement of ivory (Please note your department may call these forms different things). This will promote accountability and reduce the risks that are associated with movement, and ensure a clear and concise record of movement is maintained.

One of the highest risks to the ivory, and personnel moving it, is the possibility of their being involved in a road traffic accident (RTA). Good journey management will ensure that, in the event of any accident, the alarm is raised and assistance can be given to the team moving the ivory to ensure their safety and well being, and also to ensure the ivory is secured as soon as possible.

### Terminology

For the purposes of this document, the following terminology will be used:

- The person, organisation or facility sending the ivory will be called the “dispatch facility”.
- The person, organisation or facility in receipt of the ivory will be called the “receiving facility”.

Every movement of ivory requires the sign off of an “authorised person”. Each Wildlife Authority should consider who are appropriate authorised persons for each location and make a list of all those appointed. Authorised persons should be made aware of their role and responsibilities. An authorised person is required to sign off on every JMP and IMF at both the dispatch and receiving facility.

Each movement of ivory will be called “a shipment” - this can relate to a single piece of ivory or a large number of pieces being moved together. A shipment leaves a single dispatch facility and arrives at a single receiving facility. A JMP and IMF is required for each shipment. If ivory is sent from a single facility to two separate receiving facilities (or vice versa) they will be classed as two separate shipments and two separate JMP and IMFs are required.

The IMF will form a record of every piece of ivory moved in the shipment, and contain the following details (a sample IMF is attached in Appendix 6).

The JMP records the decision making process behind each shipment as well as who is accompanying the shipment, the route taken and other ancillary details. As part of the JMP a short risk assess-



ment should be completed where the authorising person notes any risks identified in relation to the proposed move, and the mitigations they have put in place to minimise the risk. A sample JMP is attached in Appendix 7.

## 5.1 TRIGGERS FOR MOVING IVORY

As mentioned in the introduction it is desirable that the storage of ivory is centralised and as such that ivory is moved up the chain from Tier 3 to Tier 2 and Tier 1 storerooms when practical. It is not necessary for the ivory to move up the chain one step at a time - where it is more convenient to move directly from a Tier 3 to a Tier 1 storeroom this should be done. In general terms movement up the chain should be made to the closest higher Tier storeroom. This minimises the distance moved at any one time, minimising the need for long journeys or overnight stops during moves therefore reducing the risk of driver fatigue and the risk to Ivory in transit being lost or stolen.

Ivory movements can be triggered by any of the following:

- A decision made by senior officials in the Wildlife Authority
- A request for ivory to be presented as an exhibit in court has been received
- Accumulated volume in a storeroom means that storeroom capacity has become an issue and ivory needs to be moved to free up space
- A security risk to the storeroom has been identified that cannot be resolved
- A disposal order for ivory has been received
- In the case of a Tier 3 storeroom one of the triggers outlined in 3.3 has been reached (copied below)

Ivory should not be stored in Tier 3 storerooms for prolonged periods of time - the intention is to move it from a Tier 3 to a Tier 1 or 2 storeroom as soon as practical. At the very least, movements should be coordinated whenever one of the following factors are met:

- At a minimum all ivory should be moved out of a Tier 3 facility every 3 months.
- If a single Tier 3 storeroom contains more than  $x$  kg of ivory ( $x$  to be defined by the Wildlife Authority at HQ level).
- If a piece of ivory that is too large to be stored safely in the Tier 3 storeroom is recovered.

## 5.2 JOURNEY MANAGEMENT PRINCIPLES

The following principles of good security management should be observed during all movement of ivory:

### 5.2.1 Timing of the Move

- a) Every effort should be made to ensure that all moves are completed during hours of daylight. The chance of an RTA is significantly higher during hours of darkness, as is the threat from crime. If there is doubt that the move can be completed in daylight then, where possible, the movement should be postponed until the following day, or if the distances involved mean that a move in daylight is impossible, consideration should be given to establishing an overnight break in the journey (see below).
- b) It is not desirable to have moves at the end of the working week. The shipment will have to be properly checked in on arrival at the receiving facility which will take time. Moves later in the week may lead to inadequate reception procedures and ivory being stored in suboptimal

conditions.

- c) Plans for the movement of ivory should be kept confidential and details of the JMP revealed only to those immediately involved in the move. For example while the driver can be informed of a duty the following day, they should not know the cargo until immediately before the move. Guards can be informed of a duty, but not of the destination.
- d) All moves should be conducted in as low a key manner as possible so as not to draw attention to the move and so the general public do not associate the move with anything of high value.

### **5.2.2 Overnight Stops**

If an overnight stop during the move is unavoidable (due to distance travelled, vehicle breakdown, etc.) then this should preferably be done in a secure facility where the ivory can be safely guarded overnight. The JMP should consider potential overnight stops and highlight any suitable overnight storage facilities that could be used in an emergency.

If an overnight stop is required then a secure facility operated exclusively by the Wildlife Authority should be identified so the vehicle carrying the shipment can be locked securely within a guarded compound overnight. If no Wildlife Authority facility is available then an alternative secure compound should be identified. This would include police stations or army bases, or other Government Agencies where there is a compound guarded 24/7 - for guidance on what security measures a suitable compound would have in place see the baseline standard for Perimeter security at Tier 2 store-rooms. On such occasions the shipment should be stored within the body of the locked vehicle and out of view. The ivory should not be unloaded during an overnight stop.

### **5.2.3 Guards**

Other than unavoidable overnight stops the vehicles and the shipment should not be left alone at any point during the move. For this reason the driver requires to be accompanied on the move by at least one guard so that during any comfort breaks at least one person can remain with the vehicle and shipment. It is desirable to have at least 2 guards accompanying the driver.

It is up to the local Wildlife Authority to decide the appropriate number of guards for the shipment and whether they should be armed or not - in accordance with local laws.

### **5.2.4 Drivers and Vehicle Maintenance**

- a) Drivers should ensure that vehicles are in good working order and that they have a full tank of fuel before the journey begins to eliminate the need for refuelling along the journey, or at the very least to ensure that any refuelling point is a significant distance from the point of departure which will help reduce the threat of anyone following the ivory move.
- b) Enough food and water for the driver and guards should be stored in the vehicle in case of emergency or delay and to minimise the need to stop along the way.
- c) Drivers must be given adequate rest breaks during the journey to ensure they remain fresh and alert. For excessively long moves 2 drivers should be considered so that they can swap and rest and drivers can remain alert.
- d) Seatbelts should be in good working order and worn by all those travelling in the vehicle.
- e) Drivers should have access to 2 way communications with HQ at all times - checks should be made to ensure that mobile telephones have signal along the entire route. Otherwise consider radio.

### **5.2.5 Packing the Shipment**

Shipments should be appropriately packaged up before the start of the move. Every piece of ivory

should be counted and recorded by the dispatch facility. Where the size of the ivory allows, it should be placed in a bag (multiple pieces of ivory can be transported in one bag). Large pieces of ivory which cannot fit in a bag should be wrapped securely in sacks, tarpaulin or other material which conceals them from sight.

Where possible shipments should be loaded onto vehicles on the day of the move, rather than left in the vehicle overnight. However, the shipment can be prepared and left in the storeroom overnight before loading onto the vehicle.

Where a shipment has been loaded onto a vehicle the day before, the vehicle must be treated as being on an overnight stop as detailed above, and guarded securely overnight.

### **5.2. Gold Standard**

- GPS fleet tracking should be deployed on all shipment vehicles so that their location is known at all times. This will augment the JMP giving reassurance to the dispatch facility and enabling the receiving facility to plan for the arrival. Moreover, many fleet tracking solutions include a “panic button” where drivers can alert HQ if they are in distress. Not only does this add a significant extra layer of security, it is possible to install engine immobilisers so that, if the vehicle is stolen, it can be stopped.
- Shipments should be transported in locked containers in the vehicle, or within the locked body of the vehicle itself. Pick up trucks can be installed with locking rear compartments.
- The added reassurance of the shipment being in secure, locked containers, out of sight from the general public, allows any guards to travel within the vehicle’s cab. This means that they will have a more comfortable journey, leaving them significantly safer in the event of an RTA, and more able to respond to an emergency situation.
- Moreover, having guards within the cab, rather than in the back of a vehicle, means that the shipment is done in a lower profile manner, reducing any undue attention that a high profile move might attract.
- In the case of larger moves, consideration should be given to using 2 or more vehicles operating in convoy. This adds extra security to the move and ensures that, in the event of an RTA or breakdown, there is immediate support at hand. Vehicles in convoy should adhere to the following guidelines:
  - Slowest vehicle travels in front
  - Vehicles keep each other in sight at all times
  - Following vehicle keeps back at a distance of at least 20 m to minimise risk of being involved in the same RTA as the lead vehicle

### **5.3 JOURNEY MANAGEMENT PLAN**

Every JMP must be authorised by an appropriate person before it is granted. The Authorising Officer has complete oversight over the move, and has the final decision on whether any move should go ahead or not - even after the JMP has been approved. For security reasons full JMPs should be held only by the authorising officer from the dispatch facility.

The JMP will include details of the following:

- Departure Point

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- Destination
- Estimated time of departure and arrival
- The route to be used
- Any approved stops along the way
- Check in points (see below)
- A short risk assessment highlighting any risks associated with the move
- Explanations of how these risks have been mitigated
- Reference number of the corresponding IMF relating to the move
- A list of all personnel accompanying the move and any mobile telephone numbers
- Details of the vehicle to be used i.e. make/model, agency owning the vehicle and licence plate
- Details of the driver i.e. name, agency, phone number
- Details of the Lead Traveller (see below) as above
- Details of the Receiving Officer (see below) as above

The following essential details should be passed on to the receiving facility:

- Departure Point
- Destination
- Estimated time of departure and arrival
- Details and contact number of Lead Traveller
- Details and volume of ivory being transported (from the IMF)

### **5.3.1 Before the Move**

The Authorising Officer will appoint a Lead Traveller who is the main point of contact for the road move.

The Lead Traveller is responsible for the immediate security of the move during transit and should raise any concerns to the Authorising Officer along the way.

The Lead Traveller should be given appropriate telecommunications to ensure that they can remain in contact with the Authorising Officer and the receiving facility throughout the move. Checks should be made to ascertain whether there is a mobile signal available for the entire move to ensure that communications can be maintained.

The Lead Traveller should ensure that the following equipment is in place in the vehicle before the journey is made:

- In car chargers for any communications equipment
- Maps and navigation equipment as required
- ID cards for all travellers as required
- First Aid Kit
- Basic Car Repair Kit
- Drinking water for all travellers for the entire journey (minimum of 1 litre per passenger).
- Emergency funds

While the Transport Manager remains responsible for the general condition of the vehicles, the Driver should check that the vehicle is in good working order before the move begins, and for reporting any issues to the Authorising Officer who will decide whether the move should go ahead.

The Driver should ensure there is a full tank of fuel before the journey begins to eliminate the need for refuelling along the journey, or at the very least to ensure that any refuelling point is a significant distance from the point of departure which will help reduce the threat of anyone following the ivory move for nefarious purposes.

Immediately before departure the Lead Traveller should contact the Authorising Officer to inform them that the journey has started.

### **5.2.2 During the Move**

- The route in the JMP should be followed.
- If there is any need to divert from the agreed route then the Lead Traveller should contact the Authorising Officer to inform them of the change and the reasons why.
- Check in Calls - if the move is a long one, or considered high risk, the Authorising Officer should consider requiring the Lead Traveller to “check in” along the route at agreed points. These calls should be made at agreed points/times to reassure the Authorising Officer that the move is continuing safely and securely and also to update the receiving facility on the estimated time of arrival for the ivory.
- If any check in calls are missed then the Authorising Officer should initiate the Alert Procedure detailed below.
- When 30 minutes away from the receiving facility, the Lead Traveller should call the Receiving Officer who will be responsible for checking in the ivory and signing for it. This should alert the Receiving Officer to the exact time of arrival enabling them to be ready and waiting when the vehicle arrives, thereby ensuring a smooth and efficient handover.

### **5.2.3 On Arrival**

- After arrival the Lead Traveller should contact the Authorising Officer to inform them that the journey has been completed and to provide any necessary updates on their journey (for example problems encountered along the route, delays, mechanical issues with the vehicle, etc.).
- The Authorising Officer can then record the journey as “complete” on the JMP.
- The Receiving Officer should then complete their portion of the IMF as detailed below.

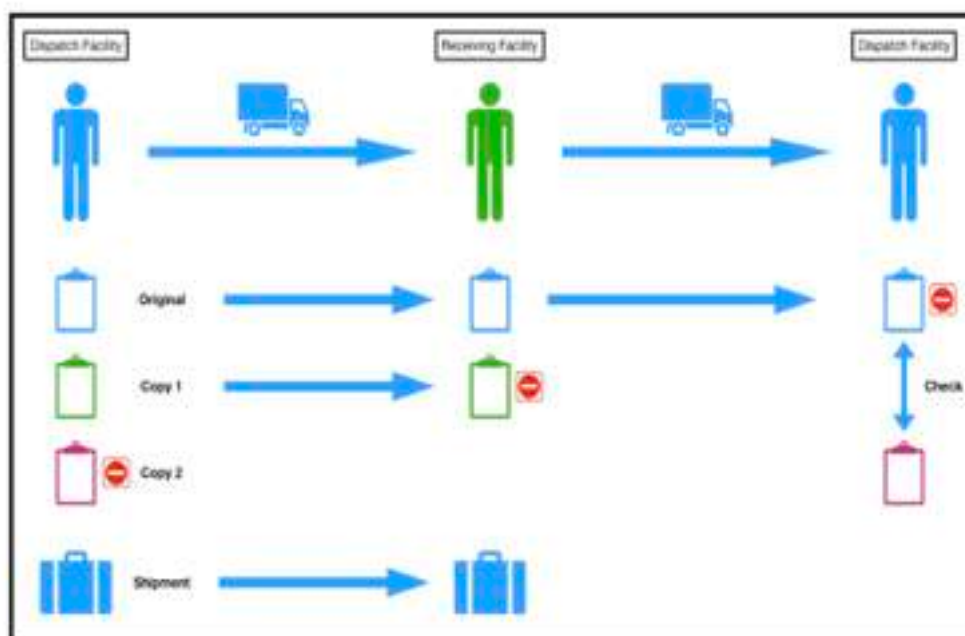
## **5.3 MOVEMENT DOCUMENTATION / PROCEDURES**

- An Ivory Movement Form (IMF) should be completed in preparation for every shipment leaving a storeroom.
- It is the responsibility of the dispatching facility to ensure that the form is correctly completed and the following procedures are followed, up until the ivory is received by the receiving facility.
- The IMF must be signed off by an authorised person at departure from the dispatching facility and by an authorized person on arrival at the receiving facility.
- Once the receiving facility has received, verified each piece and signed the IMF form, the ivory becomes the responsibility of the receiving facility.
- The IMF should consist of a triplicate carbon copy form. For the purposes of this document the carbon copy forms will be named “original”, “copy 1” and “copy 2”. The IMF will contain

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the following information and a sample IMF is included at Appendix 6. This can also be a digital form.

- i. Date and time dispatched
- ii. Details of Dispatch facility
- iii. Date and time received
- iv. Details of Receiving facility
- v. ID codes of each piece of ivory in shipment
- vi. Physical description of each piece of ivory including type, weight, length, etc.
- vii. Reference number of the tamper proof seal attached to the bag containing the ivory
- viii. Details of how ivory was recovered (i.e. recovered/seized)
- ix. Any legal case or other ID associated with each piece of ivory
- x. Details of authorised person sending the ivory
- xi. Signature of authorised person confirming that all ivory described in the shipment has been dispatched
- xii. Details of authorised person receiving the ivory
- xiii. Signature of authorised person confirming all ivory described in the shipment has been received
- xiv. Exact storage location allotted to each piece of ivory by receiving facility.



- On completing the IMF the dispatching officer will sign the form and the dispatch facility will keep copy 2 for their own records. The original plus copy 1 will be sent with shipment.
- On the shipment's arrival at its destination the receiving facility shall check the original IMF against the shipment to ensure all items are present. All being in order, the receiving officer will sign the

original and copy 1. The original will then be sent back to the dispatch facility. Copy 1 is kept by the receiving facility for their records. The receiving facility will also update their inventory to include the newly arrived shipment.

- The original IMF is sent back to the dispatch facility and checked against copy 2 to confirm all is in order. The original will be signed by the dispatching officer and stapled to copy 2 for filing. The presence of an original IMF, stapled with copy 2 with all relevant signatures will denote that the shipment is complete.
- Within a digital IMF system: there will be digital signatures required on the tablet. Once signed by dispatch and receiving facilities the movement file will be saved for record.

### **5.3 Gold Standard**

A more efficient solution than the IMF procedure outlined above is to introduce a software solution to monitor the movement of ivory.

## **5.4 ALERT PROCEDURE - MISSED CHECK IN CALL**

In the event of a scheduled check in call being missed, or a shipment missing its estimated time of arrival (ETA) at a receiving facility by more than 1 hour without a call to update the receiving facility about a delay, then the following alert procedure should be initiated.

The purpose of this alert procedure is to ascertain the location of the shipment, the reason for any delay, establish a new ETA and ensure that the shipment and personnel accompanying it, are safe. In the event that there has been an RTA, breakdown, or there is any risk to the shipment or people accompanying it then this Alert Procedure will enable the receiving facility to initiate and coordinate support for the shipment team.

It is the responsibility of the Lead Traveller to ensure that any agreed Check in Calls are made, and that any delays to the ETA are communicated to the receiving facility. Ignoring these standards will result in the Alert Procedure being initiated unnecessarily and inconvenience colleagues.

Alert Procedure: complete each step until contact is made:

- Try contacting the Lead Traveller by all means of communication they have with them.
- Try contacting all others listed in the JMP as travelling with the shipment.
- Contact the dispatching facility to confirm that the shipment left on time and ask whether they have had any contact with the travellers.
- Meanwhile identify, based on last communications, the JMP and time elapsed, where the travellers are likely to be located.
- Try the above steps for 30 mins until contact is made. If no contact is made then the following can be done:
- Contact Wildlife Authority offices in the area and other stakeholders, such as the police, to learn more information about the situation in the area where the travellers were last contacted / thought to be. Is the lost contact more likely due to unfortunate circumstances (phone battery failure, car breakdown in an area where there is no phone coverage, etc.) or a dangerous event (serious car accident, crime, civil unrest, severe weather, security incident).
- Ask the police in the local area if there has been any record of an accident or incident involving the travellers.

- If no contacts have been made after one hour, **and if safe to do so**, consider asking colleagues in that area, to conduct checks to see if the travellers can be found. Also consider asking the local police for assistance, particularly if there is any reason to suspect it may be dangerous.
- Consider calling hospitals and health facilities located near to the loss of contact, to ascertain if there has been any accident or the travellers are there. If it cannot be confirmed by telephone whether a traveller is at one of the medical facilities then these facilities should be visited.

If sending people to search for the travellers make sure that:

- At least 2 people travel together.
- They have more than one means of communication and that a regular communication procedure has been agreed; calls in should refer to the conditions on the road/local situation etc.
- They have a first aid kit and that one of the travellers is trained in providing first aid.
- A search team should only continue their journey if they assess it to be safe.

### 5.5 EMERGENCY PROCEDURE IN EVENT OF RTA

Should the movement team be involved in a road traffic accident (RTA) their primary objective is to ensure the safety and wellbeing of colleagues they are travelling with. The secondary objective is the safety and wellbeing of members of the public who may be involved; and the tertiary objective is the security of the ivory shipment.

In the event of an RTA, the following principles should be followed with the Lead Traveller taking charge, unless they are injured in which case the driver should take charge:

**Assess the situation.** Quickly discern the attitudes and behaviour of people around the accident site to ensure that you and your team are not at risk. Also evaluate quickly if other dangers could be present, for instance, the position of the vehicle on the road/chances of the vehicle catching fire.

**Secure the accident location** to avoid a secondary accident. This can be done by using bystanders to slow down oncoming vehicles, using warning signs or improvised items such as foliage placed across the road.

**Provide assistance.** If someone is injured, provide first aid as appropriate. If further medical assistance is required and there are no other alternatives, be prepared to self-drive to the nearest medical facility.

**Report it.** Make contact with HQ as soon as possible and report the incident using the standard report format (who, what, when, where, what has been done, what is needed, next contact). If appropriate, contact the police immediately.

**Record it.** Give your name, position and an official contact number to any other drivers involved in the accident. Get the same details from them.

**Remember insurance.** Adhere to any procedures required by the insurance company in regards to vehicle accidents. If feasible, take photographs of the scene and record the names and contact information of those involved, witnesses, and responding authorities. Ask permission before taking photographs. Do not photograph security officials.

**Do not discuss compensation.** If issues regarding settlement to victims for injury, loss of livestock or vehicle damage arise, contact HQ and seek advice.

**Post Incident Report.** Within 24 hours of the RTA a security incident report should be completed and shared with the journey's Authorising Officer.

**Do not intervene in accidents involving other road users in which you are not involved.**





## 6. Audit of Storeroom and SOPs

A simple assessment form, using the outlined SOPs has been developed to aide checking what aspects of a storeroom management and security need improvement.

The form runs through a series of questions regarding the storeroom perimeter, physical infrastructure, and management procedures. Answer each questions with a yes, no or partly. This will result in a score, and will highlight which aspects of the storeroom needs improving to meet the minimum standards. Use this document to confirm any of the details relating to the question.

The tool will provide an indicative assessment and relies on accurate answers, and observation of the storeroom. It is an indicative assessment, it is not a professional risk assessment. If required a full security risk assessment should be conducted by an expert in this field.

The assessment form is available for downloading.



## **Additional Documents and Appendices**

## **APPENDIX 1: SECURITY INCIDENT REPORTING**

The security at any storeroom should be subject to regular review to ensure that procedures in place are proportionate and being correctly observed. Part of this review process is establishing a simple way for staff to report any security incidents or issues they encounter. A record of these incidents will enable the Storeroom Supervisor and Manager to monitor any gaps in security and put in place measures to remedy any concerns and prevent serious security breaches. Security incidents that should be recorded are any incidents that have caused harm, or had the potential to cause harm, to people, infrastructure or the ivory being stored. Incidents may include, but are not limited to:

- a. Injury or harm to a member of staff or member of the public
- b. Damage to storeroom infrastructure or perimeter
- c. Damage to any ivory stored
- d. A change in the local threat environment (including civil disorder, criminal activity, natural disaster)
- e. Any breach in security SOPs
- f. Unauthorised entry to the storeroom
- g. Loss of a key, pass or other item which gives access to the storeroom
- h. IT security breach including password compromise
- i. Defect in the infrastructure of the storeroom (damaged shelves, poorly functioning lock, defective lighting or alarm).
- j. Unusual behaviour near the storeroom
- k. RTA or incident during transit
- l. Fire, flood or other natural disaster
- m. Theft or loss of property from storeroom vicinity
- n. Theft or loss of ivory

Any member of staff encountering a security incident should report it immediately to the Storeroom Manager and a Security Incident Report (SIR) should be completed. A template for an SIR is included below.

Completed SIRs should be held locally and a copy should be sent electronically to HQ to be stored centrally. It is important to share the SIRs between storerooms so that lessons can be learned and changes in procedure can be shared.

**SECURITY INCIDENT REPORT FORM**

Form Completed By		Date Completed	
-------------------	--	----------------	--

Date and Time of Incident		
Exact Location		
Name of People Involved	Job Title	Involvement in Incident

**Description of Incident**

Detailed Description of Incident
Cause of Incident
Details of Immediate Response
Injuries / Losses / Damage Sustained

**Lessons Learned**

Lessons Learned
Changes in Procedure

Signature (date/time)– person completing form
Signature (date/time) Storeroom supervisor

## APPENDIX 2: ESCALATION PROCEDURE

In the event of a serious security incident it is important that news of the incident is reported to senior managers appropriately. For that purpose every Storeroom should have in place an Emergency Plan. The Emergency Plan should be activated if there is any serious security incident at a storeroom which has ongoing impact or if there has been a loss of ivory in the storeroom, or in transit to a storeroom. The Emergency Plan should contain the following:

### A. Emergency Contact Procedure

All members of staff should be made aware of who to contact in event of an emergency. They should all be given a telephone number which they can call to activate the Emergency Plan if they encounter a security incident.

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Each storeroom should purchase a duty mobile telephone which is shared around the Storeroom Managers and held by the Storeroom Manager on duty. This number should be the permanent Emergency Contact Number for the storeroom, ensuring that all staff have just one number to call and that number will always be answered by an appropriate officer who is able to respond promptly.

### B. Emergency Response Team

- a) Above all to keep staff safe.
- b) To keep stored ivory secure.
- c) To arrange and manage the local response to the incident.
- d) To inform HQ of the incident and take advice on how to respond.
- e) To keep HQ informed of any response to the incident and agree key decisions.
- f) To brief local staff on the incident.
- g) To record any actions and decisions made.

And following conclusion of the incident:

- h) Completing a lessons learned process
- i) Implementing any changes to procedure
- j) Informing local staff on changes

### C. Crisis Management Team

At HQ level a Crisis Management Team (CMT) should be established to manage any serious security incident at HQ level. The CMT will receive reports of any emergencies from storerooms around the country and coordinate any response that is required. Their responsibilities will include:

- a) Providing guidance and support to the ERT.
- b) Sending extra manpower to the ERT if required.
- c) Providing necessary authority for any costs associated with dealing with an emergency.

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- d)** Managing any interaction with other Government bodies.
- e)** Managing any interaction with, or messaging to the press and media.
- f)** Managing any issues which may impact the reputation of the Wildlife Authority.
- g)** Communicate with other Storerooms as appropriate.
- h)** To record any actions and decisions made.

And following conclusion of the incident:

- i)** Participate in any lessons learned process, and ensure it is completed.
- j)** Provide advice to other storerooms and recommend changes in procedure to them.
- k)** Inform all staff about any changes to procedure.

### **APPENDIX 3: WHISTLEBLOWING PROCEDURE**

It is recommended that every Wildlife Authority puts in place a procedure whereby members of staff can confidentially raise concerns about any aspect of security and the safe management of ivory stores. Members of staff in the field are often best placed to identify potential security issues that may otherwise be invisible to managers. These members of staff may be concerned about raising these issues publicly, and should be given a path to communicate with senior decision makers in confidence.

This “whistleblowing” procedure can be a telephone number or email address that staff are free to contact with their concerns. It is important that all contacts are dealt with confidentially and without prejudice so that staff are not discouraged from using this means of communication.

Staff should know that all messages will be read, but they may not receive direct responses because of issues of confidentiality.

The whistleblowing procedure can be advertised to staff in a constructive manner through posters at their work place or through emails or training sessions.

## **APPENDIX 4: THE ROLE OF THE STOREROOM SUPERVISOR**

One Storeroom Supervisor will be appointed for each storeroom. In carrying out their role, the Storeroom Supervisor will:

- Have ultimate responsibility for the storeroom and its contents.
- Ensure that all security and storeroom management procedures are all being properly observed.
- Maintain the master list of keys and key holders for the storeroom, including adding and removing authorised persons from the list.
- Maintain the list of all those permitted access to the storeroom, including adding and removing authorised persons from the list.
- Granting access (in writing) to any visitors requiring temporary access to the storeroom for any reason.
- Maintain the list of all those permitted access to the records of the storeroom, including adding and removing authorised persons from the list.
- Ensure that at least one storeroom manager is in attendance whenever the storeroom is in operation.

### **Every Week the Storeroom Supervisor will:**

- Hold a meeting with the Storeroom Manager to discuss any issues or expected ivory shipments.
- Ensure that electronic records have been backed up.
- Visually check the paper records to ensure they are being properly kept up to date and accurate.

### **Every Month the Storeroom Supervisor will:**

- Conduct a visual inspection of the storeroom to ensure that SOPs are being followed.
- Review the list of key holders and confirm it is up to date and correct.
- Review the list of those authorised to enter the storeroom and confirm it is up to date and correct.
- Review the list of those authorised to access the records of the storeroom and confirm it is up to date and correct.
- Review any digital access systems, ensuring that they are up to date and correct.

### **Every Two Months the Storeroom Supervisor will:**

Carry out a spot check audit on the storeroom as detailed above.

### **Every 6 Months the Storeroom Supervisor will:**

Change passwords on electronic records.

### **Annually the Storeroom Supervisor will:**

- Oversee the annual CITES audit of the ivory storeroom
- Provide or receive training or retraining of employees on recording, storage, emergency and transportation procedures.
- Assess physical structure of facility and its perimeter for any security enhancements or changes.
- Assess organization of stockpile and identify any storeroom or organizational enhancements.
- Review roles and responsibilities of employs/organizational diagram to ensure adequate staffing.



## **APPENDIX 5: THE ROLE OF THE STOREROOM MANAGER**

Answering directly to the Storeroom Supervisor, at least one Storeroom Manager will be appointed to oversee the day to day running of the storeroom. A sufficient number of Storeroom Managers will be appointed to ensure that one Manager is on duty at the storeroom at all times while it is in operation. For this purpose a Storeroom Supervisor may also be considered a Storeroom Manager.

In carrying out their role, the Storeroom Supervisor will:

- Ensure the storerooms is kept secured at all times unless attended by an authorised person.
- Hold the master list of keys and key holders and ensure that only those on the list have keys.
- Hold the list of persons authorised to enter the storeroom and ensure that anyone entering the storeroom is on that list or an approved visitor.
- Maintain a daily log recording all those entering the storeroom.
- Ensure that stock records (paper and electronic) are accurate, up to date and available for the storeroom supervisor, or other appropriate individuals, to review at any time.
- Ensure that only those on the authorised persons list are permitted to get access to the storeroom records.
- Ensure the storeroom is clean and well organised at all times with environmental conditions which ensure the safe preservation of the contents.
- Ensure that the storage racks, shelves or containers are properly used and that different types of ivory are stored separately as described in the SOPs.
- Ensure that incoming ivory is properly “checked in” and accounted for, including being marked, recorded on the database, and stored in a correct manner.
- Ensure that any outgoing ivory is properly accounted for and that Ivory Movement Forms have been properly completed and authorised before ivory is released.
- Ensure equipment required for the weighing, marking and recording of ivory is kept on shelves within the storeroom or in a secure room in the near vicinity.
- Ensure all equipment is properly calibrated and in good working order, reporting any faults immediately.
- Ensure the health and safety of all those using the storeroom, and taking all necessary precautions to prevent accidents within the store.
- Ensure that there is an appropriate fire extinguisher in place either inside the storeroom, or immediately outside.
- Raising any concerns about any aspect of the storeroom with the Storeroom Supervisor at the first available opportunity.

### **Every Day the Storeroom Manager will:**

- At the start of their duty conduct a visual inspection of the exterior of the storeroom. This should include a patrol of the entire facility, noting any issues or changes from the night before and escalating them as appropriate. If a guard is present, they should be accompanied by the guard during this inspection.
- Speak to the guards and confirm whether they have anything to report from their patrols in the last

## Guidelines for Ivory Management

24 hours.

- Check the door to the storeroom; ensure it is locked securely.
- Check any windows to the storeroom ensuring the window bars are secure and that the interior remains invisible from the outside.
- Ensure the daily log of those entering the storeroom is up to date and sign off that it is correct.
- Ensure all records are up to date before they go off duty.
- **Every Time the Storeroom is Opened, the Storeroom Manager will:**
- Conduct a visual inspection of the storeroom interior noting any issues since the last time it was opened and escalating them as appropriate.
- At the end of their duty ensure that the storeroom is clean and tidy with all items properly stored.
- Lock down the storeroom when their duty inside is complete.
- Ensure any alarm is set when they go off duty.

### **Every Week the Storeroom Manager will:**

- Open the storeroom and conduct a visual inspection of the store to confirm shelves are robust, materials safely stored, walls, locks, doors and window (with bars) are all in good order.
- Ensure that all lights are in working order.
- Ensure that all locks are in working order and not damaged or jammed.
- Walk the perimeter of the storeroom and record and remedy any issues.
- Check the gates to the storeroom facility and record and remedy any issues.
- Check that any CCTV is operating correctly (all cameras) and that images are being recorded; record and remedy any issues.

### **Every Month the Storeroom Manager will:**

1. Ensure that the fire extinguisher is operational and tested.
2. Check that all key holders still have their keys by visually inspecting them.
3. Perform a test of the alarm system, including setting it off and making sure sensors are functioning correctly.

### **As Required the Storeroom Manager will:**

- Follow any reasonable instruction from the Storeroom Supervisor.
- Carry out any spot check audits requested by the Storeroom Supervisor
- Carry out the annual CITES audit of the ivory storeroom.

## APPENDIX 6: JOURNEY MANAGEMENT PLAN

1. Authorisations			
Dispatch Facility		Receiving Facility	
Proposed Date and Time of Shipment		Proposed Date and Time of Arrival	
1.1. Details of Authorising Officer			
Authorising Officer		Telephone Number	
Signature Approving Dispatch			
1.2. Details of Receiving Officer			
Receiving Officer		Telephone Number	
Signature Approving Plan			
1.3. Accompanying Ivory Movement Form			
IMF Reference Number			

2. Staff and Vehicle Accompanying Shipment			
2.1. Lead Traveller			
Name		Mobile Number	
2.2. Driver			
Name		Mobile Number	
2.3. Guards			
Name		Mobile Number	
Name		Mobile Number	
Name		Mobile Number	
Name		Mobile Number	
2.4. Vehicle			
Registration		Make / Model	
Registration		Make / Model	

3. Agreed Route			
<b>3.1. Detail below the agreed route to be taken during the move. Provide detail of roads to be used, towns passed through, etc.</b>			
3.2. Check in Points (if necessary)			
Check in 1 Location		Check in 1 Time	
Check in 2 Location		Check in 2 Time	
Check in 3 Location		Check in 3 Time	
3.3. Other Approved Stops or Approved Overnight Stops (if necessary)			
Stop 1 Location		Stop 1 Time	
Stop 2 Location		Stop 2 Time	
Stop 3 Location		Stop 3 Time	

4. Risk Assessment	
<b>4.1. Provide a brief summary of the primary risks associated with this movement of ivory</b>	
<b>4.2. Outline the mitigations put in place to deal with the risks identified</b>	

<b>4.3. Outline the outstanding risks associated with the move that are accepted by the Authorising Officer</b>

## 5. Post Move Assessment

3.1. Please note below any incidents relating to the move, including:

- Issues with vehicle
- Issues with agreed route (was any change in route required?)
- Any missed check in calls
- Any use of emergency procedure

## APPENDIX 7: IVORY MOVEMENT FORM

1. Movement Log			
<b>1.1. Details of Dispatch Facility</b>			
Dispatch Facility		Authorised Person	
Date and Time Shipment Dispatched		Signature Approving Dispatch	
<b>1.2. Details of Receiving Facility</b>			
Receiving Facility		Authorised Person	
Date and Time Shipment Received		Signature Confirming Receipt	
<b>1.3. Movement Complete</b>			
Authorised Person		Signature Confirming Completion	
Date and Time of Completion		Comments	

2. Shipment Details								
Ivory Piece	CITES Code	Physical Description	Weight	Length	Recovered / Seized	Legal Case (if applicable)	Tamper Proof Seal	Storage Location
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								