

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



Seventy-fifth meeting of the Standing Committee
Panama City (Panama), 13 November 2022

Interpretation and implementation matters

General compliance and enforcement

NATIONAL IVORY ACTION PLANS PROCESS

1. This document has been prepared by the Secretariat pursuant to the *Guidelines to the National Ivory Action Plans (NIAP) process*¹, contained in Annex 3 to [Resolution Conf. 10.10 \(Rev. CoP18\)](#) on *Trade in elephant specimens*.
2. The present document and its annexes contain the reporting of the Secretariat in accordance with the *Guidelines*, pertaining to the selection of new Parties to participate in the NIAP process. To update the Standing Committee and draw attention to developments since the 74th meeting of the Standing Committee (SC74, Lyon, March 2022), the Secretariat, as relevant, also includes reporting on some of the Parties currently subject to the NIAP process.

Identification of Parties to participate in the NIAP process

3. In accordance with Step 1, paragraph a), of the *Guidelines*, the foundation for identifying Parties to participate in the NIAP process is the ETIS report submitted to each meeting of the Conference of the Parties. The ETIS report prepared for CoP19 is available as Annex 1 to document [CoP19 Doc. 66.6](#), and identifies China as a Category B Party, and South Sudan as a country in Category C, to be considered for inclusion in the NIAP process.²
4. In preparing its recommendations, the Secretariat engaged with the Parties concerned and with experts, as required by Step 1, paragraph b), of the *Guidelines*.³ The Secretariat would like to thank the expert agencies for the information and inputs provided. The Secretariat also, as needed, engaged in additional informal consultations with TRAFFIC as the manager and coordinator of ETIS, requesting information on the latest raw data available to ETIS regarding China and South Sudan. The Secretariat would like to thank TRAFFIC for the information provided.
5. The reporting of the Secretariat on China and South Sudan is contained in Annex 1 to the present document. Recommendations concerning these two Parties prepared by the Secretariat according to Step 1, paragraph c), of the *Guidelines* are presented in paragraph 10 of the present document, as

¹ referred to as 'the Guidelines' throughout the rest of the present document.

² Category A Parties are Parties most affected by illegal trade in ivory, Category B Parties are Parties markedly affected by illegal trade in ivory, and Category C Parties are Parties affected by illegal trade in ivory.

³ The Secretariat invited the International Union for Conservation of Nature (IUCN), the CITES MIKE programme, the United Nations Development Programme, as well as INTERPOL, the United Nations Office on Drugs and Crime, the World Bank and the World Customs Organization as partner agencies to the International Consortium on Combating Wildlife Crime (ICWC), to provide additional information to be considered to determine if China and South Sudan should be included in the NIAP process or not.

recommendations a) and b), for consideration by the Standing Committee in accordance with Step 1, paragraphs d) and e), of the *Guidelines*.

Parties that did not report to SC74 in accordance with the *Guidelines*

6. Mozambique, Nigeria, and Togo (Category A Parties); and Angola, Cameroon, the Democratic Republic of the Congo and Ethiopia (Category C Parties), did not submit their reports on progress with NIAP implementation to SC74 in accordance with the timeframe set in Step 4, paragraph a) of the *Guidelines*. As a result, these reports could not be evaluated by the Secretariat as required by Step 4, paragraph c) of the *Guidelines*. At SC74, the Standing Committee therefore agreed a number of recommendations concerning these Parties, as presented in paragraph 28.4 of the [Summary record](#) of that meeting. The reporting of the Secretariat on these Parties is contained in Annex 2 to the present document (except Ethiopia for the reasons outlined below). The recommendations of the Secretariat concerning these Parties are presented in paragraph 10 of the present document, as recommendations c) to h).

Parties that 'achieved' their NIAPs

7. Ethiopia (Category C Party) reports that it has, in accordance with Step 5 paragraph a) of the *Guidelines*, assessed 80% of its NIAP actions as 'substantially achieved' and all remaining NIAP actions as 'on track' and it is therefore eligible to exit the NIAP process.
8. The report on progress with NIAP implementation received from Ethiopia is available as Annex 8 to the present document. The evaluation by the Secretariat of the report received from Ethiopia, conducted in accordance with Step 5, paragraphs b) and c) of the *Guidelines*, is available as Annex 3 to the present document.
9. The recommendation of the Secretariat concerning Ethiopia is presented in paragraph 10 of the present document, as recommendation i).

Recommendations

10. The Standing Committee may wish to consider the following recommendations.

Implementation of Step 1 of the *Guidelines to the National Ivory Action Plans (NIAP) process: Identification of Parties to participate in the NIAP process*

China

- a) The Secretariat recommends that the Standing Committee:
 - i) not include China in the NIAP process;
 - ii) welcome China's continued efforts to respond to and address illegal trade in ivory, and encourage China to remain vigilant and closely review trends to ensure that the activities and measures implemented respond effectively to illegal trade in ivory as it affects China; and
 - iii) request the Secretariat, in accordance with Resolution Conf. 10.10 (Rev. CoP18), to continue to monitor illegal trade in ivory as it relates to China, and to bring any matters of concern that may arise to the attention of the Committee.

South Sudan

- b) The Secretariat recommends that the Standing Committee:
 - i) not include South Sudan in the NIAP process; and
 - ii) request the Secretariat, in accordance with Resolution Conf. 10.10 (Rev. CoP18), to continue to monitor illegal trade in ivory as it relates to South Sudan, and to bring any matters of concern that may arise to the attention of the Committee.

Parties that did not report to the 74th meeting of the Standing Committee (SC74, Lyon, March 2022) in accordance with the *Guidelines*

Angola

- c) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'limited progress', in line with Step 4 paragraph e) of the *Guidelines*; and
 - ii) welcome the progress made by Angola since SC70 and encourage the Party to build upon this to fully implement its NIAP.

Cameroon

- d) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'limited progress', in line with Step 4 paragraph e) of the *Guidelines*, and
 - ii) encourage Cameroon to intensify its efforts to seek funding for the effective implementation of its NIAP.

Democratic Republic of the Congo

- e) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'partial progress', in line with Step 4 paragraph e) of the *Guidelines*;
 - ii) note that the DRC moved to the category of highest prominence under the NIAP process and is identified as a Category A Party;
 - iii) request the Democratic Republic of the Congo to enhance efforts to progress the implementation of its NIAP as a matter of priority between SC75 and SC77;
 - iv) request the Democratic Republic of the Congo to prioritize the implementation of the actions under pillars C on information related to crimes and E on law enforcement operations; and
 - v) at SC77, if not satisfied with timely progress in the implementation of NIAP actions by the DRC, make recommendations as appropriate, which may include recommendations in accordance with Resolution Conf. 14.3 (Rev. CoP18) on *CITES compliance procedures*.

Mozambique

- f) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'partial progress', in line with Step 4 paragraph e) of the *Guidelines*; and
 - ii) encourage Mozambique to take note of the information about Vietnamese crime syndicates operating from the country and to further strengthen its engagement with Viet Nam, undertaking joint operations and further strengthening information and intelligence exchange, drawing upon relevant agreements signed with Viet Nam, as appropriate.

Nigeria

- g) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'partial progress', in line with Step 4 paragraph e) of the *Guidelines*;
 - ii) note the concerns regarding the escalation of illegal trade in ivory as it affects Nigeria, as detailed in paragraph 35 of Annex 2 to document SC75 Doc. 7.4; and

- iii) encourage Nigeria to urgently progress its NIAP implementation, including through considering the actions in its NIAP when advancing the implementation of the National Strategy on Wildlife and Forest Crime in Nigeria 2022 – 2026.

Togo

- h) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'limited progress', in line with Step 4 paragraph e) of the *Guidelines*;
 - ii) note that seven out of the 21 actions in Togo's NIAP are rated as 'not commenced'; and encourage Togo to move ahead with the overall implementation of its NIAP with a sense of greater urgency.

Parties that 'achieved' their NIAPs

Ethiopia

- i) The Secretariat recommends that the Standing Committee:
 - i) agree an overall rating of 'achieved' in line with Step 4, paragraph e), of the *Guidelines*, and commend Ethiopia for achieving its NIAP;
 - ii) encourage Ethiopia to complete the implementation of any NIAP actions that have not yet been 'achieved';
 - iii) agree that Ethiopia exit the NIAP process in accordance with Step 5 of the *Guidelines*; and
 - iv) request the Secretariat, in accordance with Resolution Conf. 10.10 (Rev. CoP18), to continue to monitor illegal trade in ivory as it relates to Ethiopia, and to bring any matters of concern that may arise to the attention of the Committee.

National Ivory Action Plan (NIAP) process

Implementation of Step 1 of the *Guidelines to the NIAP process*: Identification of Parties to participate in the NIAP process

1. China

Guidelines to the NIAP process, Step 1, paragraph a): Elephant Trade Information System (ETIS) report prepared for CoP19

1. The below represents a compilation of information from the [ETIS report](#) to the 19th meeting (CoP19, Panama City, 2022) relevant to China, prepared by the Secretariat.
2. The ETIS report submitted to CoP19 identifies China as a Category B Party. The report clusters China together with Viet Nam and states that the two Parties had high total weight equal or greater than 500 kg for seizures that were made in country (as well as for seizures in which the countries were implicated (weight-out 500 kg+). The report also states that together Viet Nam and China accounted for 59% (VN – 50%; CN – 9%) of the weight-in 500 kg+ and 42% (VN – 34%; CN – 8%) of the weight-out 500 kg+ from 2018 – 2020. The report further states that both countries also had low numbers of medium raw ivory seizures (10-100 kg) and that China ranked highest among all 65 countries for worked ivory seizures made in country.
3. The report notes that China has previously participated in the NIAP process exiting it in 2018 and that it has regularly reported to ETIS. The report states that China also ranked high (4th rank) for the amount of seized weight that implicated Parties, accounting for 8% of the overall volume by weight of implicated trade. The report finds that China had a relatively high Law Enforcement (LE) ratio of 0.95.
4. The ETIS report highlights that there have been numerous seizures made in China (n = 415), with the majority consisting of seizures of worked ivory, with some consignments containing over a hundred (n = 8) and two of over a thousand pieces of worked ivory. The report also states that when China was implicated by other Parties, it was relatively rarely reported as the country of origin (n = 3) or export (n = 20) on the trade chain, and most frequently reported as country of destination (n = 148). The report notes a few large-scale raw ivory seizures reportedly destined to China were made from 2018 – 2020 including 8.8 and 7.5 tonnes seizures that were respectively exported from the Democratic Republic of the Congo and Nigeria in 2019. The report suggests that unlike other countries included in the ETIS analyses, China seems to have direct and indirect trade links with numerous other countries in Asia, Africa, North America and Europe.
5. The report also notes that China continued its commitment to curtail domestic ivory trade including implementing a total ban that took effect on 31 December 2017, just before the period of data summarized for the present ETIS report to CoP19. The report further notes that China demonstrated commitment in pursuing and dismantling key crime syndicates operating domestically and abroad. The report states that while the COVID-19 pandemic precluded physical market surveys, ongoing monitoring of online and social media platforms has documented a decrease in the number of online advertisements for ivory products in China (although next to rhino horn, ivory products were the most frequently offered wildlife product in a 2017-2018 survey).
6. The report concludes that despite China showing strong commitment to curb domestic ivory trade and aggressive investigation and prosecution of its nationals involved in overseas wildlife trafficking, the Party still remains a primary destination for illegal ivory.

Guidelines to the NIAP process, Step 1, paragraph b): Additional information provided by China

7. In implementing Step 1 of the *Guidelines to the NIAP process*¹, the Secretariat on 19 July 2022 sent a letter to China informing the Party that it is identified as a Party for consideration under Category B in the ETIS report prepared for CoP19. The Secretariat invited China to provide any additional information it

¹ referred to as 'the Guidelines' throughout the rest of the present document

considers relevant for determining if it should be included in the NIAP process to the Secretariat no later than 12 August 2022. The Secretariat provided China with the full ETIS report prepared for CoP19. In addition, the Secretariat prepared and provided China with a compilation of information from the ETIS report highlighting some of the key issues relevant to China and noting that there may be matters of a more general nature in the report itself, that China might want to address when submitting additional information.

8. The response received from China is available as Annex 4 to document SC75 Doc. 7.4, in English only. In its report, China highlights that it attaches great importance to combatting the illegal trade in ivory and that it has successfully been making large-scale seizures, demonstrating its ability and determination to solve this problem. China also points out that it has put in place stricter domestic measures regarding ivory than required under CITES, with no exemptions for household or personal effects or pre-Convention ivory specimens.
9. China furthermore acknowledges that worked ivory is illegally entering the country and it points out that this illegal trade is tied mainly to Chinese residents in Africa and to Chinese tourists bringing back illegal worked ivory as souvenirs. China states that it addresses this problem through education campaigns targeted at the Chinese population residing in Africa and through warnings via SMS to Chinese tourists travelling abroad. China also reports that it assists countries of origin and transit of illegal ivory in making seizures, through intelligence sharing and other forms of assistance.
10. It should be noted that China has set out in its response to the Secretariat concerns about the content of the ETIS report and the underlying cluster analysis and that it indicated that it does not agree with the methodology, findings and conclusions of the report as it concerns China.

Guidelines to the NIAP process: Step 1, paragraph b): Engagement with experts and other relevant information

11. As part of the Secretariat's consultation with experts, pursuant to Step 1 paragraph b) of the *Guidelines*, information relevant to China was received from the CITES Monitoring the Illegal Killing of Elephants (MIKE) Programme and the United Nations Development Programme (UNDP).
12. The CITES MIKE Programme reported that the estimated elephant population size totals for Xishuangbanna, the sole MIKE site in China, are 111 elephants in 2016, and 162 in 2020. No population estimates are available for the intervening years. The MIKE Programme also reported that since 2015 no illegally killed elephant carcasses have been reported for Xishuangbanna.
13. UNDP noted China's ban on commercial processing and trade in elephant ivory that was implemented on 31 December 2017. UNDP also drew attention to the most recent survey on the subject published by the World Wildlife Fund in 2021², which demonstrates that consumer demand for elephant ivory in China continues to decline since the national ban was passed, noting that there seems to be a very small increase in self-reported ivory purchases in 2021 compared to 2020. UNDP highlighted that, despite this minor increase, the purchases of diehard buyers of illegal ivory have decreased to the lowest level since 2017, and regular overseas travelers, one of the most determined ivory consumer segments, reached their lowest stated intention to buy ivory since 2017.
14. The Secretariat also consulted informally with TRAFFIC as the manager and coordinator of ETIS, requesting information on the latest data on China available to ETIS. The information provided demonstrates that after passing the ban on domestic ivory trade in 2017, the reported number of seizures of worked ivory (the bulk of the ETIS records) made by Chinese authorities in mainland China increased in 2019, followed by a decrease in 2020 during COVID-19, and an increase again in 2021. Reported raw ivory seizures made in China decreased from 2018 to 2021. The information also shows that seizures made by other countries where China was identified as part of the illegal trade chain decreased from 2018 to 2021, although it is noted by TRAFFIC that some raw ivory seizures in this category were of very large weight (> 7.5 tonnes). The information provided by TRAFFIC further demonstrates that if reported data are aggregated for the years 2015 – 2017 and 2018 – 2020 (i.e., pre- and post- domestic ivory trade ban of 2017), the total number of seizures and weight seized in China increased (2015 – 2017: 481 seizures for a total of 6,403 kg; 2018 – 2020: 620 seizures for a total of 10,995 kg). The information provided further shows that, at the same time, there was a reduction in the number of seizures and weight made by other

² Meijer, W., Bergin, D., Cheng, T., Yang, C. and Kritski, E. (2021). *Demand under the Ban – China Ivory Consumption Research 2021*. WWF, Beijing, China. Available at: https://wwfint.awsassets.panda.org/downloads/china_ivory_consumption_research_2021_final_1.pdf

countries where China was identified as part of the illegal trade chain (2015 – 2017: 703 seizures for a total of 20,132 kg; 2018 – 2020: total of 192 seizures for a total of 9,535 kg).

Guidelines to the NIAP process, Step 1, paragraph c): Recommendation of the Secretariat

15. The ETIS reports prepared for CoP16 and CoP17 identified China as a Category A Party and the ETIS report for CoP18 as a Category B Party. The ETIS report prepared for CoP19 again identifies China as a Category B Party. Although the ETIS report prepared for CoP19 states that China ranked high for the amount of seized weight that implicated Parties, accounting for 8% of the overall volume by weight of implicated trade, it must be noted that the report also acknowledges China demonstrated commitment in pursuing and dismantling key crime syndicates operating domestically and abroad.
16. The available information indicates that consumer demand for elephant ivory in China is declining since the domestic ivory trade ban was passed in 2017. The information also indicates that China is detecting illegal ivory consignments with a high level of success. The number of seizures and the quantity of ivory seized by China increased in the period from 2018 to 2021, while at the same time, the number and weight of seizures made by other countries where China is implicated as part of the illegal trade chain decreased. This is suggesting decreased illegal activity following the domestic ivory trade ban and continuous or increasing enforcement effort, which is also reflected in China's high Law Enforcement (LE) ratio of 0.95 which has been identified in the ETIS report.
17. At SC70, the Secretariat reported that, overall, China has taken significant steps and implemented comprehensive measures to respond to and address illegal trade in ivory. The Standing Committee, based on the information presented and its deliberations, agreed at SC70 that China exit the NIAP process. Current information shows that China's efforts to respond to and address illegal trade in ivory have been maintained. The substantial efforts made by the Party, its progress to date and its continued vigilance must be fully recognized.
18. China continues the implementation of measures and activities to address illegal trade in ivory, and it is unlikely that requesting the Party to develop and implement a new NIAP will have any significant impact beyond the measures that the Party has already put in place and continues to pursue.
19. The reasons upon which the Standing Committee at SC70 based its decision that China exit the NIAP process remain valid. **The Secretariat recommends that China not be included in the NIAP process** and considers that it will be appropriate to continue to monitor illegal trade in ivory as it relates to China in accordance with Resolution Conf. 10.10 (Rev. CoP18).

2. South Sudan

Guidelines to the NIAP process: Step 1, paragraph a): ETIS report prepared for CoP18

20. The below represents a compilation of information from the ETIS report to CoP19 relevant to South Sudan, prepared by the Secretariat.
21. The ETIS report identifies South Sudan as a country in Category C. The report states that South Sudan is a relatively young country, and not a Party to CITES, and that as such South Sudan has never reported data to ETIS. The report notes that data for South Sudan are based on non-Party data reported for seizures made within country or based on other Parties' data that implicated South Sudan as a country in the illegal ivory trade chain. The report notes that South Sudan has relatively lower values for most input data into the ETIS cluster analysis, except for large seizures-out and weight-out 500kg+ where South Sudan has respectively ranked 6th and 8th for these variables (out of the 65 countries in the ETIS cluster analysis).
22. The ETIS report further highlights that, from 2018 to 2020, data for one seizure-in was obtained from open sources, and South Sudan was also implicated by other Parties submitting seizure data to ETIS. The report states that the most notable seizure associated with South Sudan occurred in 2019 and consisted of a 3.2 tonne shipment of raw ivory that was seized by Ugandan officials and was reportedly destined to Viet Nam. The report notes that it has been reported that some of the ivory in that seizure bore the markings of tusks that derived from the 83-tonne Burundi stockpile that was first registered in 1989 and each piece marked by the CITES Secretariat. The report notes that the long route used to move ivory that is believed to have originated in Burundi through the Democratic Republic of the Congo to South Sudan before moving it back to Kampala, suggests that South Sudan may now be serving as transit point in the regional illegal wildlife trade. The report further notes that in the ETIS analysis South Sudan has the lowest

Corruption Perception Index score indicating high levels of corruption in the country. It also notes a low Law Enforcement ratio of 0.33.

Guidelines to the NIAP process, Step 1, paragraph b): Additional information provided by South Sudan

23. In implementing Step 1 of the *Guidelines*, the Secretariat on 19 July 2022 sent a letter to South Sudan, informing the country that it is identified as a country for consideration under Category C in the ETIS report prepared for CoP19. The Secretariat invited South Sudan to consider submitting to the Secretariat any relevant information for determining the scope and scale of illegal trade in ivory as it affects South Sudan. The Secretariat provided South Sudan with the full ETIS report prepared for CoP19. In addition, the Secretariat prepared and provided South Sudan with a compilation of information from the ETIS report, highlighting some of the key issues relevant to the country.
24. In response to the Secretariat's letter, South Sudan submitted ivory inventory reports for the years 2016 to 2018, on 12 August 2022. The response by South Sudan is available as Annex 11 to document SC75 Doc. 7.4, in English only. The ivory inventory reports consist of seizure records, showing 61 seizures (totaling 55 kg of ivory) in 2016, 27 seizures (totaling 44 kg) in 2017³, and 155 seizures (totaling 69 kg) in 2018.

Guidelines to the NIAP process, Step 1, paragraph b): Engagement with experts and other relevant information

25. As part of the Secretariat's consultation with experts, pursuant to Step 1 paragraph b) of the *Guidelines*, information relevant to South Sudan was received from the CITES MIKE Programme and UNDP.
26. The CITES MIKE Programme noted that there are no MIKE sites in South Sudan and therefore no information is available on the Proportion of Illegally Killed Elephants (PIKE) trends for elephants in the country. The MIKE Programme noted the International Union for Conservation of Nature's (IUCN) African Elephant Status report from 2016⁴ which, based on survey data from 2007 to 2010, estimates the total number of elephants in South Sudan to be 7,103 ± 5,911.
27. UNDP noted that acceding to CITES is currently under consideration by the Council of Minister Government of South Sudan and that in addition, the national environment policy 2015 -2025 calls for the implementation of the global Multilateral Environment Agreements, including CITES. UNDP further reported that South Sudan has five protected areas, and that significant work has been done in the recent past, including the development of a management plan with support from the Global Environment Facility and UNDP. UNDP reported that South Sudan's wildlife conservation policy recommends the Gazettement of new protected areas or re-gazettement. UNDP pointed out that laws on wildlife conservation and tourism are yet to be enacted by South Sudan and that these laws will be critical legal frameworks for combating wildlife poaching, illegal wildlife trade, and protection and monitoring of endangered species including elephants. UNDP noted that there is a lack of data on South Sudan's wildlife population and that the exact number of elephants in South Sudan is unknown by the authorities in South Sudan. UNDP, however, noted that the Wildlife Conservation Society (WCS) and the South Sudan Wildlife Service estimated an elephant population of some 2,300 in the country before the civil war, which began in May 1983, down from about 79,000 in the 1970s.
28. UNDP highlighted that South Sudan's wildlife conservation policy recommends the establishment of a robust monitoring system for endangered species. UNDP expressed its opinion that the capacity of the South Sudan Wildlife Service to protect endangered species, including elephants, needs to be strengthened, for example, with regards to providing information to ETIS. In this context, UNDP also highlighted the need to strengthen and upgrade existing training facilities (e.g. Boma Wildlife Training Centre and Nimule Training Centre), and the need to strengthen measures to combat illegal wildlife trade, such as adopting best practices to control key entry and exit points at borders, airports, and other potential trafficking points in collaboration with customs, police, and other competent authorities.
29. The Secretariat also consulted informally with TRAFFIC as the manager and coordinator of ETIS, requesting information on the latest data on South Sudan available to ETIS. TRAFFIC reported that, while

³ The Secretariat notes that 13 of the 27 seizures identified in the inventory report for 2017 were made in December 2016.

⁴ C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché (2016). *African Elephant Status Report 2016: an update from the African Elephant Database. Occasional Paper Series of the IUCN Species Survival Commission, No. 60 IUCN / SSC Africa Elephant Specialist Group. IUCN, Gland, Switzerland. vi + 309pp. Section on Eastern Africa available at: https://portals.iucn.org/library/sites/library/files/documents/SSC-OP-060_C.pdf*

not a Party to CITES, South Sudan has one approved data provider on ETIS Online, registered since March 2021. TRAFFIC noted that South Sudan never directly reported to ETIS but through ETIS Online had a chance to review data collected from other sources. The information provided by TRAFFIC shows data on seizures made by South Sudan is very sparse. It is reported that the last notable seizure of 1,286 kg of raw ivory was seized by South Sudan in 2016, followed by another seizure made by the country in 2018 of 63kg of raw ivory. No other seizures were reported to ETIS for period 2015 to 2021. Furthermore, regarding ivory seized by other countries where South Sudan was identified as part of the illegal trade chain, TRAFFIC reports 13 seizures, totaling 4.6 tonnes of ivory, in the period from 2015 to 2021. TRAFFIC notes that most of the weight seized by other countries (4.5 tonnes out of 4.6 tonnes) can be attributed to two seizures from 2017 and 2019 – both seizures reported South Sudan as the country of origin and both reported “BI” (Burundi) markings on the raw ivory.

Guidelines to the NIAP process, Step 1, paragraph c): Recommendation of the Secretariat

30. The Secretariat notes that South Sudan is for the first time identified as a country affected by illegal trade in ivory by the ETIS report prepared for CoP19. It notes that overall, ETIS data indicates that South Sudan was implicated as a source or transit country in a maximum of three significant cases of illegal international trade in ivory in the period 2015 - 2021. In one of the three cases, the respective seizure was made by South Sudan itself.
31. The Secretariat welcomes that South Sudan, as reported by UNDP, is currently considering acceding to the CITES and that the country’s national environment policy calls for the implementation of the global Multilateral Environment Agreements.
32. The Secretariat notes the potential connection of the two large-scale seizures made in 2017 and 2019 to the Burundi stockpile. The Secretariat will examine this matter further as part of its technical mission to Burundi, which is being planned pursuant to [recommendation 61.2 d\)](#), agreed by the Standing Committee at its 74th meeting (SC74, Lyon, March 2022).
33. The Secretariat also notes that critical legal frameworks in South Sudan for combating wildlife crime, including combatting illegal wildlife trade, are yet to be enacted, and it encourages South Sudan to proceed in this regard as a matter of priority.
34. The Secretariat further notes the concerns raised by UNDP regarding the need to strengthen the capacity of the South Sudan Wildlife Service, as well as the measures to combat illegal wildlife trade at key entry and exit points. The Secretariat encourages governmental, intergovernmental and non-governmental organizations and others to, where possible, provide financial and technical assistance to South Sudan to address these challenges.
35. The Secretariat notes that South Sudan is not a Party to the Convention. It also notes that there is a presumption in Step 1 paragraph c) of the *Guidelines* that Category C Parties are not recommended for participation in the NIAP process.
36. The Secretariat recommends that **South Sudan not be included in the NIAP process**, and that illegal trade in ivory as it relates to South Sudan continue to be monitored in accordance with Resolution Conf. 10.10 (Rev. CoP18).

National Ivory Action Plan (NIAP) Process

Parties that did not report to the 74th meeting of the Standing Committee (SC74, Lyon, March 2022) in accordance with the *Guidelines to the NIAP Process*

Angola

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Angola's assessment (SC70)	40% (19 of 47 actions)	0% (0 of 47 actions)	0% (0 of 47 actions)	30% (14 of 47 actions)	21% (10 of 47 actions)	9% (4 of 47 actions)
Secretariat's assessment (SC70)	40% (19 of 47 actions)	0% (0 of 47 actions)	6.5% (3 of 47 actions)	32% (15 of 47 actions)	6.5% (3 of 47 actions)	15% (7 of 47 actions)
Angola's assessment (following SC74)	81% (38 of 47 actions)	0% (0 of 47 actions)	0% (0 of 47 actions)	17% (8 of 47 actions)	2% (1 of 47 actions)	0% (0 of 47 actions)
Secretariat's assessment (SC75)	77% (36 of 47 actions)	0% (0 of 47 actions)	13% (6 of 47 actions)	8% (4 of 47 actions)	0% (0 of 47 actions)	2% (1 of 47 actions)

1. Angola did not submit a report on progress with NIAP implementation to SC74 in accordance with the provisions of Step 4, paragraph a), of the *Guidelines*, and the Committee subsequently agreed recommendation b) in document [SC74 SR](#), directed to Angola amongst others.
2. As requested by the Committee, following SC74, the Secretariat issued a warning letter to Angola on behalf of the Committee, requesting the Party to submit its NIAP progress report to the Secretariat within 60 days of the conclusion of SC74. The Secretariat received this report within the set deadline, on 9 May 2022. The Secretariat conducted an assessment of the report received and concluded that Angola has made good progress with NIAP implementation since SC70. The Secretariat shared its findings and observations with Angola.
3. The NIAP of Angola includes 47 priority actions. Angola's self-assessment, available as Annex 5 to document SC75 Doc. 7.4, evaluates 38 actions as 'achieved', eight as having achieved 'partial progress' and one as 'pending completion of another action'.
4. Considering the information provided by Angola in its report, the Secretariat believes that it might be more appropriate to rate actions A.3, A.5, B.2, F.2 and F.3 as 'on track' rather than 'partial progress'. Regarding actions C.1, C.3, and C.5, the Secretariat notes that the information provided by Angola is limited and encourages the Party to provide further information on the implementation of these actions. Regarding action C.2, Angola may wish to clarify if the protocol on poaching and trafficking in wild animals and their derivatives has been updated as foreseen by the action. In the absence of such a clarification, the Secretariat proposes a rating of 'on track' for this action. Regarding action C.4, the Secretariat believes that it might be more appropriate to rate this action as 'not commenced'. Regarding action E.6, the same information is provided as in Angola's progress report to SC70, yet the rating changed from 'partial progress' to 'achieved'. The Secretariat also notes that no information is provided on the identification of priority points for implementation and on the creation of identification capacity in the form of equipment or personal, as foreseen by the

milestones of this action. In this light, the Secretariat believes that action E.6 should remain rated as 'partial progress'.

5. The ETIS reports prepared for CoP16 to CoP18 identified Angola as a Category C Party. The [ETIS report prepared for CoP19](#) no longer identifies Angola as a priority Party. While this is a positive development, sustained action and vigilance remain essential, and Angola is encouraged to continue implementing its NIAP with full force. In this context the Secretariat notes the importance of implementing actions C.1, C.3 and C.5, which Angola rated as 'achieved' but for which it did not provide sufficient detail to justify these ratings. The Standing Committee may wish to encourage Angola to provide further detail on the implementation of these actions in an oral update at SC75.
6. In light of the above, the Standing Committee may wish to in line with Step 4, paragraph e) of the *Guidelines*, consider an overall rating of 'limited progress' for Angola, whilst also acknowledging the progress made by Angola since SC70.

Cameroon

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Cameroon's self-assessment (SC70)	28% (13 of 47 actions)	42% (20 of 47 actions)	13% (6 of 47 actions)	9% (4 of 47 actions)	2% (1 of 47 actions)	6% (3 of 47 actions)
Secretariat's assessment (SC70)	25% (12 of 47 actions)	25% (12 of 47 actions)	32% (15 of 47 actions)	9% (4 of 47 actions)	2% (1 of 47 actions)	6% (3 of 47 actions)
Cameroon's self-assessment (following SC74)	39% (17 of 44 actions)	30% (13 of 44 actions)	25% (11 of 44 actions)	4% (2 of 44 actions)	0% (0 of 44 actions)	2% (1 of 44 actions)
Secretariat's assessment (SC75)	34% (15 of 44 actions)	21% (9 of 44 actions)	36% (16 of 44 actions)	7% (3 of 44 actions)	0% (0 of 44 actions)	2% (1 of 44 actions)

7. Cameroon did not submit a report on progress with NIAP implementation to SC74 in accordance with the provisions of Step 4, paragraph a), of the *Guidelines*, and the Committee subsequently agreed recommendation b) in document [SC74 SR](#), directed to Cameroon amongst others.
8. As requested by the Committee, following SC74, the Secretariat issued a warning letter to Cameroon on behalf of the Committee, requesting the Party to submit its NIAP progress report to the Secretariat within 60 days of the conclusion of SC74. The Secretariat received this report within the set deadline, on 7 May 2022. The Secretariat conducted an assessment of the report received and concluded that Cameroon has made progress with NIAP implementation since SC70. The Secretariat shared its findings and observations with Cameroon.
9. The [NIAP of Cameroon](#) contains 43 priority actions. In its progress report to SC70, Cameroon reported on all 43 actions of its NIAP as well as on four additional actions. In its progress report submitted following SC74, the Party reported on all 43 actions of its NIAP as well as on one additional action (action 4.3.4). Cameroon's self-assessment, available as Annex 6 to document SC75 Doc. 7.4, evaluates 17 actions as 'achieved', 13 as 'substantially achieved', 11 as 'on track', two as having achieved 'partial progress' and one as 'not commenced'.
10. Regarding action 3.1.2, the Secretariat welcomes Cameroon's participation in Africa-TWIX. However, the reporting under this action does not provide information on the use of informants and the Secretariat therefore believes that a rating of 'on track' would be more appropriate than the rating of 'substantially achieved'. Regarding action 3.1.3, the Secretariat notes that the same information is provided as in Cameroon's reports on progress submitted following SC69 and to SC70, yet the rating of the action has

changed from 'on track' to 'substantially achieved'. The Secretariat is of the opinion that the rating of 'on track' should remain in place. Regarding action 4.1.2, the Secretariat welcomes the Memorandum of Understanding (MoU) between the Ministry of Forests and Wildlife and the Ministry of Defense. The Secretariat notes however that the indicators for this action foresee further MoUs with other key administrative partners. The Secretariat therefore believes that a rating of 'on track' would be more appropriate for this action. Regarding actions 5.1.2, 5.2.1, and 5.5.1, the Secretariat notes that the same information is provided as in Cameroon's report on progress with NIAP implementation prepared for SC70, but the ratings for these actions are lower than those in the progress report prepared for SC70. Regarding action 5.3.1, the Secretariat notes that a number of detection materials such as scanners could not be purchased due to financial constraints. The Secretariat would therefore suggest a rating as 'on track' for this action. Regarding action 6.1.2, the Secretariat notes that the erection of a memorial stone for poached elephants to raise awareness amongst the public is still ongoing. The Secretariat would therefore suggest a rating of 'on track' for this action.

11. The ETIS reports prepared for CoP16 and CoP17 identified Cameroon as a Category B Party, whilst the ETIS report prepared for CoP18 identified Cameroon as a Category C Party. The ETIS report prepared for CoP19 no longer identifies Cameroon as a priority Party. While this is a positive development, sustained action and vigilance remain essential, and Cameroon is encouraged to continue implementing its NIAP with full force. In this context, the Secretariat notes that Cameroon has not been able to make significant progress on actions 5.6.1, 5.7.3 and 6.1.1 in its NIAP due to funding constraints. The Standing Committee may wish to encourage Cameroon to intensify efforts to seek funding for the effective implementation of these actions.
12. Overall, the progress report of Cameroon demonstrates continued progress with NIAP implementation, and the Standing Committee may wish to consider in line with Step 4 of the *Guidelines* an overall rating of 'limited progress' for Cameroon.

Democratic Republic of the Congo

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
DRC's self - assessment (SC70)	0% (0 of 28 actions)	29% (6 of 28 actions)	39% (11 of 28 actions)	21% (6 of 28 actions)	4% (1 of 28 actions)	7% (2 of 28 actions)
Secretariat's assessment (SC70)	0% (0 of 28 actions)	21% (6 of 28 actions)	47% (13 of 28 actions)	21% (6 of 28 actions)	4% (1 of 28 actions)	7% (2 of 28 actions)
DRC's self - assessment (following SC74)	0% (0 of 28 actions)	46% (13 of 28 actions)	50% (14 of 28 actions)	0% (0 of 28 actions)	4% (1 of 28 actions)	0% (0 of 28 actions)
Secretariat's assessment (SC75)	0% (0 of 28 actions)	46% (13 of 28 actions)	50% (14 of 28 actions)	0% (0 of 28 actions)	4% (1 of 28 actions)	0% (0 of 28 actions)

13. At SC74, the Standing Committee agreed recommendation f) directed to the Democratic Republic of the Congo (DRC). The recommendation can be found in document [SC74 SR](#). The Committee noted, *inter alia*, that the DRC did not use the template for reporting on progress, as required by Step 4, paragraph b), of the *Guidelines* and as requested by the Standing Committee at its 70th meeting (SC70, Sochi, October 2018). The Committee further noted that the DRC did not report on five of the 28 actions included in its NIAP, and that, as a result, the Secretariat was not able to fully evaluate the progress made by the DRC. The Committee also noted concerns regarding the escalation of illegal trade in ivory from the DRC, as detailed in paragraph 43 of Annex 1 to document SC74 Doc. 28.4;
14. As requested by the Committee, following SC74, the Secretariat issued a warning letter to the DRC on behalf of the Committee, requesting the Party to submit its NIAP progress report to the Secretariat within 60 days of the conclusion of SC74. The Secretariat received this report within the set deadline, on 9 May 2022. The

Secretariat conducted an assessment of the report received and concluded that the DRC has made progress with NIAP implementation since SC70. The Secretariat shared its findings and observations with the DRC.

15. The [NIAP of the DRC](#) includes 28 priority actions. The DRC's self-assessment, available as Annex 7 to document SC75 Doc. 7.4, evaluates 13 actions as 'substantially achieved', 14 as 'on track', and one as 'pending completion of another action'. The Secretariat concurs with these ratings.
16. The Secretariat notes that the DRC has made the most significant shift amongst all Parties identified by the ETIS report prepared for CoP19. The ETIS report prepared for CoP18 identified the DRC as a Category C Party. In the ETIS report prepared for CoP19, the DRC has moved to the category of highest prominence and is now identified as a Category A Party. The ETIS report prepared for CoP19 highlights that, from 2018 to 2020, the DRC had the highest volume of illegal ivory trade that was not detected in country (i.e., weight-out), which in total consisted of 31% of the implicated trade volume by weight for the 65 countries included in the ETIS analysis. The report furthermore highlights that the two largest seizures ever recorded in ETIS were exported from DRC in 2019 and constituted over 83% of the 21.5 tonnes of reported seized ivory that implicated the DRC. In this context, it is worth noting that the report states that during the same time the DRC reportedly seized only 329 kg of ivory in country, and that the DRC itself has not reported to ETIS since 2016.
17. The ETIS report prepared for CoP19 further highlights that the DRC's role in the illegal trade chain was mostly as country of export of ivory from Africa to Asia. It notes that the two record-setting seizures had similar reported illegal trade routes going from the DRC transiting through the Republic of Congo and Singapore where one shipment that was destined for Viet Nam was seized in Singapore, whereas the other shipment transited through Singapore to Viet Nam (where it was intercepted) en route to China. It is stated that a third shipment of 3.4 tonnes of ivory was also shipped from the DRC through Congo and Singapore, destined for Viet Nam where it was seized. The report points out that these three maritime shipments totalling 21.3 tonnes were seized within a four-month period from March to July 2019, and that the latter shipment of 3.4 tonnes of ivory also included 4 tonnes of pangolin scales. The report concludes that such large-scale shipments in a short timeframe, and the large volume of other wildlife contraband is likely an indication of organized criminal activity.
18. In this context, the ETIS report also points to the Organized Crime Index by the Global Initiative Against Transnational Organized Crime, which ranks the DRC with the highest criminality score among 193 countries, attributing high scores to illegal wildlife trade as well as other contraband. The DRC also ranked fourth lowest on ETIS' Corruption Perception Index, indicating high levels of corruption, and the ETIS report points to a recent study by TRAFFIC, indicating that the study revealed that, over the last 26 years, a minimum of 7,686 kg of ivory had gone missing from government custody.¹
19. The DRC's movement to the highest category of prominence in the ETIS analysis prepared for CoP19, and the available information on recent trends as highlighted, demonstrate that there is an urgent need for further action and stepped up efforts in the DRC. The Secretariat notes that the NIAP of the DRC was originally approved in 2015, and that the Party revised and updated its NIAP in January 2018. The Secretariat is of the opinion that a further revision and update of the NIAP of the DRC is at present not a priority and that instead the Party should reinforce and expand its efforts to implement the NIAP found to be adequate in 2018. In this context, the DRC may wish to prioritize the implementation of the actions under pillars C on information related to crimes and E on law enforcement operations.
20. The Standing Committee may wish to consider an overall rating of 'limited progress' for the Democratic Republic of the Congo in line with Step 4 of the *Guidelines*.

¹ Mashini, M.C. et Nkoke, S.C. (2020). *Les Stocks d'Ivoire d'Elephant de la République Démocratique du Congo: Quel Système de Gestion Mettre en Place? TRAFFIC International. Yaoundé, Cameroun. Pp. 84.*

Mozambique

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Mozambique's assessment (following SC74)	0% (0 of 16 actions)	6% (1 of 16 actions)	50% (8 of 16 actions)	44% (7 of 16 actions)	0% (0 of 16 actions)	0% (0 of 16 actions)
Secretariat's assessment (SC75)	0% (0 of 16 actions)	0% (0 of 16 actions)	56% (9 of 16 actions)	44% (7 of 16 actions)	0% (0 of 16 actions)	0% (0 of 16 actions)

21. At SC74, the Standing Committee agreed recommendation I) in document [SC74 SR](#) directed to Mozambique. The Committee, *inter alia*, noted the revised and updated National Ivory and Rhino Action Plan (NIRAP) of Mozambique.
22. The Committee further noted that the report on progress with NIRAP implementation submitted by Mozambique was not using the NIAP progress report template and was not submitted 90 days in advance of the meeting, as required by Step 4, paragraph a) of the *Guidelines*, and that the Secretariat was as a result not able to evaluate the report prior to SC74, as required by Step 4, paragraph c), of the *Guidelines*. The Committee requested Mozambique to submit a revised report on progress with NIRAP implementation within 60 days of SC74, using the NIAP progress report template available on the NIAP webpage.
23. Pursuant to the Committee's recommendation, Mozambique submitted its report within the set deadline, on 10 May 2022, using the NIAP progress report template. The Secretariat conducted an assessment of the report received and concluded that Mozambique has made progress with the implementation of its NIRAP since the revised and updated NIRAP of Mozambique was found adequate in September 2020. The Secretariat shared its findings and observations with Mozambique.
24. The NIRAP of Mozambique includes 16 priority actions. Mozambique's self-assessment, available as Annex 9 to document SC75 Doc. 7.4, evaluates one action as 'substantially achieved', eight as being 'on track', and seven as having achieved 'partial progress'.
25. Regarding action 1.1, the Secretariat noted that the action, rated as 'on track' in part B of the progress report, is ambiguously rated as 'on progress' in part C. The Secretariat concurs with the rating as 'on track' in part B. Regarding action 2.6, the Secretariat welcomes the information provided on the Greater Lebombo Conservancy (GLC) but notes that no information has been provided on the dehorning of rhinos in the Limpopo National Park (*LNP*). In the absence of such information, the Secretariat believes that a rating of 'on track' would be more appropriate for this action.
26. The ETIS report prepared for CoP18 identified Mozambique as a Category A Party whilst the ETIS report prepared for CoP19 identifies Mozambique as a Category B Party. While this is a positive development, the Secretariat notes that the ETIS report prepared for CoP19 also highlights that, from 2018 to 2020, Mozambique had the fourth-highest volume by weight of large-scale seizures made in country and the seventh-highest volume by weight of large-scale seizures in which the country was reportedly implicated. The ETIS report also notes that Mozambique's trade volume by weight was 4% and 3% of the total respective trade volumes across the 65 countries included in the ETIS analysis. The report further highlights that Mozambique's role in the illegal trade chain was most notably linked with that of Cambodia and that there had been possible leakage of ivory tusks from Mozambique's stockpile in an illegal shipment to Cambodia. Mozambique also continues to be an important transit country in the illegal rhinoceros specimen trade chain, as detailed in document [CoP19 Doc. 75 \(Rev. 1\)](#) on *Rhinoceroses (Rhinocerotidae spp.)*. Mozambique is the Party that was fifth most affected by illegal trade in rhinoceros specimens in the period 2018 to 2020, in terms of the weight and number of specimens detected in illegal trade. The ETIS report also cites information alleging that Vietnamese syndicate operatives, who have been operating throughout Mozambique since at least 2015, have scaled up their operations from bases in the south of the country, and exported multiple consignments of ivory to Malaysia and Cambodia. This information seems to be corroborated by information in the report prepared in accordance with paragraph 7 of Resolution Conf. 9.14 (Rev. CoP17) on

Conservation of and trade in African and Asian rhinoceroses, available as Annex 4 to document CoP19 Doc. 75 (Rev. 1). Of the rhinoceros specimen seizures made in Mozambique for which information on the country of destination was available, 75% were destined for Viet Nam. Similarly, of the seizures made elsewhere that identified Mozambique as country as origin, 64% indicated Viet Nam as country of destination. As reported in document CoP19 Doc. 75 (Rev. 1), Mozambique and Viet Nam in August 2017 agreed a Memorandum of Understanding (MoU) on *Cooperation in Wildlife Conservation and Protection*. This was followed by additional law enforcement agreements signed in 2018 and 2019, providing a legal basis for collaboration to combat illegal wildlife trade.

27. The Standing Committee may wish to note to the information about Vietnamese crime syndicates operating from Mozambique and to encourage the Party to further strengthen its engagement with Viet Nam, by undertaking joint operations and further strengthening information and intelligence exchange, drawing upon relevant agreements signed with Viet Nam, as appropriate.
28. The Secretariat recommends an overall rating of 'partial progress' for Mozambique, in accordance with Step 4, paragraph e), of the *Guidelines*.

Nigeria

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Nigeria's assessment (following SC74)	0% (0 of 19 actions)	26% (5 of 19 actions)	64% (12 of 19 actions)	10% (2 of 19 actions)	0% (0 of 19 actions)	0% (0 of 19 actions)
Secretariat's assessment (SC75)	0% (0 of 19 actions)	10% (2 of 19 actions)	69% (13 of 19 actions)	21% (4 of 19 actions)	0% (0 of 19 actions)	0% (0 of 19 actions)

29. At SC74, the Standing Committee agreed recommendation m) in document [SC74 SR](#), directed to Nigeria. The Committee, *inter alia*, noted the revised and updated NIAP of Nigeria.
30. Nigeria did not submit a report on progress with NIAP implementation to SC74 in accordance with the provisions of Step 4, paragraph a), of the *Guidelines*. The Standing Committee subsequently requested the Secretariat in accordance with Step 4, paragraph f), of the *Guidelines*, to issue a warning on behalf of the Committee, requesting Nigeria to submit its NIAP progress report to the Secretariat within 60 days of the conclusion of SC74.
31. As requested by the Committee, following SC74, the Secretariat issued a warning letter to Nigeria and received a progress report from Nigeria within the set deadline, on 7 May 2022. The Secretariat conducted an assessment of the report received and concluded that Nigeria has made progress with the implementation of its NIAP since the revised and updated NIAP of Nigeria was found adequate in May 2020. The Secretariat shared its findings and observations with Nigeria.
32. In addition to the information contained in Nigeria's report to the present meeting, the Secretariat notes that Nigeria has finalized the National Strategy on Wildlife and Forest Crime in Nigeria 2022 - 2026², with support from UNODC. The strategy was launched in April 2022, following a series of consultations with a broad range of representatives of the key stakeholders as well as a high-level validation workshop.
33. The NIAP of Nigeria includes 19 priority actions. The self-assessment report prepared by Nigeria, available as Annex 10 to document SC75 Doc. 7.4, evaluates five actions as 'substantially achieved', 12 as being 'on track', and two as having achieved 'partial progress'.

² https://www.unodc.org/documents/nigeria/National_Strategy_to_Combat_Wildlife_and_Forest_Crime_in_Nigeria_2022-2026.pdf

34. Regarding action B.1, the Secretariat welcomes the progress made on wildlife crime intelligence and investigation procedures but notes that no information is provided on the development of a national protocol for intelligence gathering and investigation procedures, which is foreseen in milestone 2 of the action. In the absence of information in this regard, the Secretariat believes that a rating of 'on track' would be more appropriate for this action. Regarding action B.12, the Secretariat welcomes the efforts by Nigeria to build capacity among relevant law enforcement agencies operational at ports of entry and exit to strengthen CITES controls, using a risk-based management approach. However, it appears from the information provided that these efforts to build capacity are currently ongoing and have not yet resulted in putting in place mature risk management practices and that a risk-based management approach in particular regarding container control has not yet been fully implemented. In light of these considerations, the Secretariat is of the opinion that a rating of 'on track' would be more appropriate for this action. Regarding action B.13, the Secretariat believes that a rating of 'partial progress' would be more appropriate as most of the milestones for this action have not yet been met. Regarding action E.1, the Secretariat recalls that Nigeria, as noted by the Standing Committee in recommendation m) at SC74, did not submit its reports on progress with NIAP implementation in time for SC66, SC67, SC69, SC70 and SC74. In this light and considering the absence of reporting to ETIS described in paragraph 35 below, the Secretariat believes that a rating of 'partial progress' would be more appropriate for this action.
35. In the ETIS report prepared for CoP18, Nigeria moved from a Category C Party to higher prominence as a Category A Party. The ETIS report prepared for CoP19 again identifies Nigeria as a Category A Party. The report notes that, from 2018 to 2020, Nigeria ranked the second largest of all Parties in terms of total weight-out in the illegal trade in ivory, accounting for 29% of the implicated trade volume and including the third largest seized amount ever reported to ETIS. The report further notes that, during the same period, Nigeria made few seizures in country and that the Party has not reported to ETIS since 2016. The report also highlights that for large seizures (500 kg+) that included trade chain information on exporting countries, Nigeria was the most commonly reported country of export/re-export with 17.3 tonnes of raw ivory reportedly shipped from Nigeria destined for mainland China, Hong Kong Special Administrative Region of China and Viet Nam. It is reported that all large seizures were hidden in sea freight containers, and that at least two seizures also included large quantities of other contraband, including pangolin scales. The ETIS report therefore concludes that Nigeria serves as an export country for large illegal shipments of wildlife moving from Africa to Asia and that these activities are likely facilitated by organized crime groups.
36. The Standing Committee may wish to note the concerns expressed in the ETIS report and encourage Nigeria to urgently progress its NIAP implementation, including through considering the actions in its NIAP when advancing the implementation of its National Strategy on Wildlife and Forest Crime in Nigeria 2022 – 2026.
37. The Secretariat recommends an overall rating of 'partial progress' for Nigeria, in accordance with Step 4, paragraph e), of the *Guidelines*.

Togo

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Party's assessment (following SC70)	0% (0 of 21 actions)	5% (1 of 21 actions)	47.5% (10 of 21 actions)	0% (0 of 21 actions)	0% (0 of 21 actions)	47.5% (10 of 21 actions)
Secretariat's assessment (SC71)	0% (0 of 21 actions)	0% (0 of 21 actions)	29% (6 of 21 actions)	19% (4 of 21 actions)	0% (0 of 21 actions)	52% (11 of 21 actions)
Party's assessment (following SC74)	5% (1 of 21 actions)	0% (0 of 21 actions)	33% (7 of 21 actions)	29% (6 of 21 actions)	0% (0 of 21 actions)	33% (7 of 21 actions)
Secretariat's assessment (SC75)	5% (1 of 21 actions)	0% (0 of 21 actions)	33% (7 of 21 actions)	29% (6 of 21 actions)	0% (0 of 21 actions)	33% (7 of 21 actions)

38. Togo submitted its report on progress with NIAP implementation prepared for SC74 after the deadline for the submission of such reports. As a result, the Secretariat was not able to evaluate the report prior to SC74, as required by Step 4, paragraph c), of the *Guidelines to the NIAP process*. In light of this, the Standing Committee at SC74 agreed recommendation o) in document [SC74 SR](#), directed to Togo.
39. In accordance with recommendation o) iii), the Secretariat evaluated the progress report received from Togo, available as [Annex 13](#) to document SC74 Doc. 28.4, and shared its findings and observations with Togo. In response, Togo submitted a revised progress report to the Secretariat on 24 May 2022, taking into account the Secretariat's observations. Togo's revised progress report is made available as Annex 12 to document SC75 Doc. 7.4.
40. The [NIAP of Togo](#) includes 21 priority actions. Togo's self-assessment contained in Annex 12 evaluates one action as 'achieved', seven as 'on track', six as having achieved 'partial progress', and seven as 'not commenced'.³ The Secretariat concurs with these ratings.
41. The ETIS reports prepared for CoP17 identified Togo as a Category A Party. The ETIS reports prepared for CoP18 and CoP19 no longer identify Togo as a priority Party. While this is a positive development, sustained action and vigilance remain essential. Togo is encouraged to complete the implementation of its NIAP with a greater sense of urgency. In this context, the Secretariat notes that a third of the actions contained in the NIAP of Togo have not yet been commenced at the time of reporting. Togo may wish to clarify the reasons why the implementation of these actions has not yet been commenced and explain the barriers to their implementation.
42. Overall, the Secretariat finds that the report from Togo suggests that the Party has progressed the implementation of a number of NIAP actions. The Secretariat recommends an overall rating of 'limited progress' for Togo, in accordance with Step 4, paragraph e), of the *Guidelines*.

³ The Secretariat notes a discrepancy between Sections A and B and Section C in Togo's progress report. The Secretariat used the ratings in Section C for the present assessment.

National Ivory Action Plan (NIAP) Process

Parties that 'achieved' their NIAPs

Ethiopia

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Ethiopia's assessment (SC70)	20% (3 of 15 actions)	60% (9 of 15 actions)	20% (3 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)
Secretariat's assessment (SC70)	20% (3 of 15 actions)	40% (6 of 15 actions)	33% (5 of 15 actions)	7% (1 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)
Ethiopia's assessment (following SC74)	33% (5 of 15 actions)	60% (9 of 15 actions)	7% (1 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)
Secretariat's assessment (SC75)	20% (3 of 15 actions)	60% (9 of 15 actions)	20% (3 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)	0% (0 of 15 actions)

1. Ethiopia did not submit a report on progress with NIAP implementation to SC74 in accordance with the provisions of Step 4, paragraph a), of the *Guidelines*, and the Committee subsequently agreed recommendation b) in document [SC74 SR](#), directed to Ethiopia amongst others. As requested by the Committee, following SC74, the Secretariat issued a warning letter to Ethiopia on behalf of the Committee, requesting the Party to submit its NIAP progress report to the Secretariat within 60 days of the conclusion of SC74. The Secretariat received this report within the set deadline, on 23 April 2022. The Secretariat conducted an assessment of the report received and concluded that Ethiopia has made progress with NIAP implementation since SC70. The Secretariat shared its findings and observations with Ethiopia.
2. The NIAP of Ethiopia includes 13 priority actions. Upon the advice from the Secretariat, Ethiopia rearranged the order of its NIAP actions in its report on progress with NIAP implementation received following SC69, to align them with the pillars of the new template for reporting on progress. This resulted in some milestones being converted into two additional actions, and Ethiopia now reports against 15 priority actions. The self-assessment report prepared by Ethiopia for the present meeting, available as Annex 8 to document SC75 Doc. 7.4, evaluates five actions as 'achieved', nine as 'substantially achieved', and one as being 'on track'.¹ Based on its self-assessment, Ethiopia has 'achieved' its NIAP in accordance with Step 4, paragraph e), of the *Guidelines*.
3. Ethiopia has met the requirements to exit the NIAP process in accordance Step 5, paragraph a), of the *Guidelines* (i.e. a minimum of 80% of NIAP actions have been assessed as 'substantially achieved', and any remaining actions have been self-assessed as 'on track' for achievement).

¹ The Secretariat noted that there are some discrepancies between the ratings of actions 1.1, 1.2, 4.2 and 5.1 (reporting to CITES Secretariat, ETIS) in parts B (summary evaluation of actions) and C (detailed evaluation of actions) of the progress report. It appears that the ratings in part C as the same ratings that were given in Ethiopia's self-assessment prepared for SC70. The Secretariat therefore used the ratings in part B as the basis for its present assessment.

4. The report of Ethiopia highlights, *inter alia*, the establishment of an Environment Crime Unit at the federal level in 2020. The unit is a joint effort of the Federal Police, National Customs Service, Attorney General, National Central Bureau of INTERPOL, Finance Intelligence and Addis Ababa Police. The report also highlights that Standard Operating Procedures for the management of ivory, rhino horn and other wildlife products have been developed in 2021 with financial and technical support from the Elephant Protection Initiative (EPI). Ethiopia also reports that four additional covert operations to deter domestic illegal ivory trade were undertaken since the Party's last reporting to SC70.
5. Regarding action 1.1 on improving the legal framework on wildlife crime with a focus on deterrents, the Secretariat notes that the draft amendment to the Wildlife Act has been resubmitted to Parliament in 2019. Ethiopia may wish to clarify if Parliament has in the meantime passed the amendment into law. In the absence of such a clarification, the Secretariat believes that a rating of 'on track' would be more appropriate for this action, noting that the milestones for this action foresee the adoption of the amendment. Regarding action 1.2, the Secretariat is of the opinion that a rating of 'on track' might be more appropriate for this action, considering that the report suggests that only one harmonized regional wildlife act has been drafted to date, and that another harmonized regional wildlife act still needs to be put in place in legislation.
6. With regard to action 3.4, Ethiopia provided the same information it provided to SC70. The Party states that further work under the GEF-6 project in the country is anticipated. Ethiopia may wish to clarify if the anticipated further work has been done.
7. Regarding action 4.2, rated as 'achieved' by Ethiopia, the Secretariat welcomes the establishment of the Environment Crime Unit (ECU) in 2020 and notes that the ECU member institutions signed a Memorandum of Understanding to enhance enforcement of wildlife laws across the country. The Secretariat notes however that the milestones for this action also foresee that strategies to improve national cooperation are to be integrated into the plans of the relevant institutions. Ethiopia may wish to clarify if this has been done in the context of the ECU. In the absence of such a clarification, the Secretariat believes that a rating of 'substantially achieved' would be more appropriate for this action.
8. Regarding action 3.1 ('Improve international cooperation & collaboration to combat illegal ivory trade & trafficking') under Pillar 3 in the progress report, it is unclear from the explanations provided by Ethiopia whether any cross-border and regional cooperation agreements provided for in priority action D3 in Ethiopia's NIAP have been signed. It is however noted that multiple other activities have been conducted to support the implementation of this action. It will be good if Ethiopia could clarify if cross-border and regional cooperation agreements might still be needed, or if the need for this has been mitigated in the light of the other activities conducted.
9. Regarding action 5.1 under Pillar 5 in the progress report ('Reporting to CITES Secretariat, ETIS'), rated as 'achieved' by Ethiopia, the Secretariat notes that Ethiopia's report on NIAP implementation was not submitted to SC74 on time. The Secretariat therefore believes that a rating of 'substantially achieved' would be more appropriate for this action.
10. The ETIS reports prepared for CoP16 and CoP17 identified Ethiopia as a Category B Party, whilst the ETIS report prepared for CoP18 identified Ethiopia as a Category C Party. The ETIS report prepared for CoP19 no longer identifies Ethiopia as a priority Party. The Secretariat consulted with TRAFFIC as the manager of ETIS, requesting information on the latest data on Ethiopia available to ETIS. The Secretariat would like to thank TRAFFIC for the information provided. TRAFFIC indicated that the quantity of ivory which was seized in Ethiopia in the period 2018 to 2020 increased, demonstrating increasing law enforcement efforts. Authorities in Ethiopia prior to export from the country made eleven seizures involving 21 kg ivory in 2018, six seizures involving 32 kg ivory in 2019 and seven seizures involving 108 kg ivory in 2020. This increase should be seen in the context of the significant decrease in the quantities of ivory seized by other countries, where Ethiopia is identified as part of the illegal trade chain, suggesting that less ivory is leaving the country. Regarding the quantities of ivory seized by other countries, where Ethiopia is identified as part of the illegal trade chain, the numbers decreased from 15 seizures involving 188 kg ivory in 2018, to 8 seizures involving 182 kg ivory in 2019, to 5 seizures involving 12 kg ivory in 2020. It is welcome to observe this positive trend in the period 2018-2020, compared to the previous period of 2015 to 2017, when both the number of seizures and the quantity of ivory seized, both in Ethiopia and by other countries where Ethiopia was identified as part of the illegal trade chain, was much higher, with a total of 381 seizures involving almost three tonnes of ivory in this three-year period. This suggests that the activities and measures implemented by Ethiopia are producing positive results, and that levels of illegal trade in ivory associated with the Party is continuously decreasing.

11. As pointed out in paragraph 1 above, a minimum of 80% of actions in the NIAP of Ethiopia are now assessed as 'substantially achieved', and the remaining actions as 'on track' for achievement. In light of the positive developments mentioned above, the Secretariat recommends that the Committee consider an overall rating of 'achieved' for Ethiopia, in line with Step 4, paragraph e), of the *Guidelines*, and to commend the Party for achieving its NIAP. The Standing Committee may further wish to encourage the Party to complete the implementation of any NIAP actions that have not yet been 'achieved'.
12. Ethiopia is no longer identified as a priority Party in the ETIS report to CoP19, and the Secretariat considers that further activities can be pursued by Ethiopia outside the NIAP process.
13. The Secretariat recommends that Ethiopia exit the NIAP process in accordance with the provisions of Step 5 of the *Guidelines*, and that illegal trade in ivory as it relates to Ethiopia continue to be monitored in accordance with Resolution Conf. 10.10 (Rev. CoP18).