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CONVENCIÓN SOBRE EL COMERCIO INTERNACIONAL DE ESPECIES AMENAZADAS DE FAUNA Y FLORA SILVESTRES

CIE

Septuagésima octava reunión del Comité Permanente Ginebra (Suiza), 3 – 8 de febrero de 2025

Conservación y comercio de especies

Fauna

Elefantes (Elephantidae spp.)

CATEGORIZACIÓN DE LAS PARTES BASADA EN LOS ANÁLISIS ETIS

- 1. El presente documento ha sido preparado por la Secretaría.
- 2. En su 19.ª reunión (CoP19, Ciudad de Panamá, 2022), la Conferencia de las Partes adoptó las Decisiones 19.97 y 19.98 sobre *Categorización de las Partes basada en los análisis ETIS*, como sigue:

Dirigida a la Secretaría, en consulta con el Grupo Asesor Técnico MIKE-ETIS y TRAFFIC

19.97 Sujeto a la disponibilidad de financiación externa, la Secretaría deberá, en consulta con el Grupo Asesor Técnico MIKE-ETIS y TRAFFIC, desarrollar un proyecto de criterios para la categorización de las Partes basada en los análisis ETIS y los datos de los decomisos relacionados con los especímenes de elefante sometidos a TRAFFIC; y remitir el proyecto de criterios a la consideración de la 78ª reunión del Comité Permanente.

Dirigidas al Comité Permanente

19.98 El Comité Permanente deberá considerar el proyecto de criterios para la categorización de las Partes basada en los análisis ETIS a que se hace referencia en la Decisión 19.97 y recomendar la adopción de los criterios para la categorización de las Partes, según proceda, a la 20ª reunión de la Conferencia de las Partes.

- 3. La evolución del proceso de los Planes de Acción Nacionales para el Marfil (PANM) se remonta a cuando la Conferencia de las Partes decidió por primera vez la necesidad de planes nacionales para reforzar la aplicación de la Resolución Conf. 10.10 (Rev. CoP12). Si bien las *Directrices para el proceso de los PANM* (Anexo 3 de la Resolución Conf. 10.10), se acordaron por las Partes en la 17.ª reunión de la Conferencia de las Partes (CoP17; Johannesburgo, 2016) (CoP17 Com. II. 17), las Partes objeto de preocupación con respecto al comercio ilegal de marfil han sido identificadas en documentos examinados por la Conferencia de las Partes desde la 12ª reunión (Co P12; Santiago, 2002) (documento CoP12 Doc. 34.1). Los antecedentes y la base jurídica del proceso de los PANM se exponen en los párrafos 5 a 16 del documento CoP17 Doc. 24 (Rev. 1).
- 4. A medida que el proceso y las metodologías evolucionaron, la descripción o categorización de las Partes afectadas por el comercio ilegal también evolucionó desde la CoP12 hasta la CoP19, pasando de Partes de gran preocupación, Partes implicadas en el comercio ilícito, Partes de preocupación primaria y secundaria e importantes de vigilar, a la actual categoría A, B y C¹ tal y como se describe en las Directrices para el proceso del Plan de acción nacional para el marfil que figura en el Anexo 3 de la Resolución Conf.

Partes de categoría A (más afectadas por el comercio ilegal de marfil), categoría B (afectadas de manera acentuada por el comercio ilegal), y categoría C (afectadas por el comercio ilegal de marfil).

- 10.10 (Rev. CoP19). Estas descripciones proporcionan alguna indicación para diferenciar entre las categorías, pero las Partes no se han puesto de acuerdo sobre definiciones específicas para explicar y describir el significado y los límites exactos de cada categoría.
- 5. La asignación de las Partes a las categorías (Categoría A, B y C) la realiza TRAFFIC interpretando los resultados del análisis de conglomerados basados en los datos brutos y los datos contextuales, incluida la literatura publicada que proporciona información contextual (nota: en informes anteriores no se han utilizado umbrales para diferenciar entre categorías). El informe preparado por TRAFFIC que contiene el análisis, la interpretación y la categorización se presenta al Grupo Asesor Técnico (GAT) de MIKE-ETIS para que asesore sobre el análisis y la interpretación, tal como se exige en el mandato del GAT de MIKE-ETIS.
- 6. Al aplicar la Decisión 19.97, fue necesario empezar por aclarar cómo TRAFFIC ha identificado a las Partes que requieren atención en términos de comercio ilegal de marfil y otros especímenes de elefante en el pasado. Por lo tanto, la Secretaría solicitó a TRAFFIC que proporcionara una visión general de las metodologías utilizadas, que figura en el Anexo 1 del presente documento y abarca desde la 12ª reunión de la Conferencia de las Partes (CoP12, Santiago, 2002) hasta la CoP19. Además, la Secretaría y TRAFFIC recopilaron la información asociada a las Partes identificadas y categorizadas en los informes de la CoP16 a la CoP19 (teniendo en cuenta que, según el informe de la CoP16, se pidió a 19 Partes que prepararan PANM). El resumen figura en el Anexo 2 del presente documento.
- 7. La Secretaría y TRAFFIC presentaron estos dos documentos para su consideración por el GAT de MIKE-ETIS en su 20ª reunión (GAT 20, Nairobi, noviembre de 2024) y extrajeron elementos de datos clave utilizados para categorizar a las Partes en el informe de la CoP19 de ETIS como criterios potenciales². El GAT de MIKE-ETIS:
 - a) indicó que, debido a que no existen definiciones claras para las categorías del Anexo 3 de la Resolución Conf. 10.10 (Rev. CoP19), es difícil desarrollar criterios detallados para cada categoría;
 - estuvo de acuerdo en que la información de los Anexos 1 y 2 del presente documento proporciona un resumen completo del análisis y los datos del ETIS utilizados para categorizar a las Partes desde la CoP12; y
 - c) recomendó que los elementos de datos clave utilizados para categorizar a las Partes en el informe ETIS CoP19, tal y como fueron extraídos por la Secretaría, podrían proponerse para que sirvan como criterios a considerar en la categorización de las Partes en futuros informes, pero no se pueden establecer umbrales específicos para cada uno.

Identificación de las Partes que requieren atención por parte de TRAFFIC en el contexto del Paso 1, párrafo a) de las Directrices para el Proceso del Plan de Acción Nacional para el Marfil: Proyecto de criterios que utilizará TRAFFIC

- 8. Las *Directrices para el proceso de los PANM*, Paso 1, párrafo a) indican que la base para identificar a las Partes que participarán en el proceso de los PANM es el informe del ETIS presentado en cada reunión de la Conferencia de las Partes en virtud de la Resolución Conf. 10.10 (Rev. CoP19).
- 9. Basándose en el asesoramiento proporcionado por el Grupo de asesoramiento técnico (GAT) MIKE-ETIS y tras obtener más aclaraciones de TRAFFIC sobre el uso de los elementos de datos clave, la Secretaría propone el siguiente proyecto de criterios para que TRAFFIC los utilice en el párrafo a) del Paso 1 de las Directrices para el proceso de los PANM:
 - a) Criterios de exclusión: países que <u>NO</u> deben incluirse en el análisis (según lo establecido en el análisis de tendencias del ETIS):

Partes que en un periodo de 10 años obtuvieron una puntuación inferior a 100 según los datos de decomisos de entrada o de salida utilizando la siguiente fórmula:

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Los siguientes se presentaron al MIKE-ETIS TAG: Criterios de exclusión (puntuación inferior a 100); Medida de escala (peso medio); Porcentaje/proporción de decomisos a gran escala respecto al peso medio; Índice de Percepción de la Corrupción (indicador para medir la eficacia de la aplicación de la ley); Esfuerzo de aplicación de la ley [relación sz-in/(sz-in+sz-out)]; Índice de Delincuencia Organizada (una medida del nivel de delincuencia organizada dentro de cada país o territorio); Presentación de informes (a ETIS como se detalla en cada grupo); Otros elementos (PIKE, informes anuales de la CITES).

1 x número de decomisos a pequeña escala (menos de 10 kg) +

10 x número de decomisos medianos (entre 10 kg y 100 kg) +

100 x número de decomisos a gran escala (al menos 100 kg)

- b) Criterios de categorización: basados en datos del ETIS (Nota: no se especifican los umbrales por categoría):
 - i) Criterio de categorización 1): medida de la escala del comercio basada en variables ajustadas por sesgo de entrada y salida de decomisos resumidas como:
 - A. Número de decomisos por tipo de marfil y clases de peso
 - B. Peso total
 - C. Porcentaje de volumen de comercio

El criterio supra se utilizará de la siguiente manera para determinar las tres categorías del PANM:

Categoría A: Parte con uno de los volúmenes de comercio ilegal más elevados en

comparación con otras.

Categoría B: Parte con un volumen de comercio ilegal elevado en comparación con

otras.

Categoría C: Parte con un volumen de comercio ilegal medio que podría aumentar y

convertirse en un motivo de preocupación si no se vigila de cerca y se

aborda.

ii) i) Criterio de categorización 2): Vínculos del comercio ilegal de marfil y medida del esfuerzo de aplicación de la ley [relación LE de incautación-entrada/(incautación-entrada+incautación-salida)³]

El criterio supra se utilizará de la siguiente manera para determinar las tres categorías del PANM:

Categoría A: Partes regularmente asociadas con decomisos de marfil realizados en otros lugares y que no detectan o a menudo no detectan envíos ilegales que se

originan, transitan o ingresan a sus territorios (ratio de aplicación de la ley

bajo).

Categoría B: Partes ocasionalmente asociadas con decomisos de marfil realizados en

otros lugares, y que interceptan con éxito la mayoría de los envíos ilegales de marfil procedentes de, en tránsito por o entrando en sus territorios

(proporción de aplicación de la ley de media a alta).

Categoría C: Partes que están implicadas en decomisos de marfil por primera vez o que

forman parte de una tendencia emergente en términos de registros implicados y varían en términos de aplicación de la ley (proporción de

aplicación de la ley baja o media)

- 10. Además de los criterios del proyecto del párrafo 9 *supra*, TRAFFIC considera actualmente la siguiente información como información contextual:
 - a) *Îndice de Percepción de la Corrupción (IPC)* (indicador para medir la eficacia de la aplicación de la ley): Un IPC más alto indica que se percibe que el país tiene menos corrupción.

Relación de decomisos LE/(decomisos LE+decomisos LE). Los decomisos realizados dentro del país o territorio se denominan decomisos LE y los decomisos en los que la Parte estuvo implicada a lo largo de la cadena comercial como país o territorio de origen, reexportación, exportación o destino se denominan decomisos LE.

- b) Índice de Delincuencia Organizada (IDO) (una medida del nivel de delincuencia organizada dentro de cada país o territorio): Un IDO más alto indica niveles más altos de delincuencia organizada.
- c) Literatura publicada, informes de la CITES y literatura revisada por pares: información contextual que incluye operaciones especiales realizadas en países para reducir la delincuencia organizada, casos judiciales notables o legislación dirigida al comercio ilegal de marfil u otras especies silvestres, información basada en análisis forenses y tendencias en el movimiento de marfil desde los países de origen y exportación, y otra información relevante de los informes de la CITES y la literatura revisada por pares.
- 11. La Secretaría opina que la información supra debe seguir siendo contextual y no debe considerarse como criterio para informar la categorización de las Partes. Existen algunas preocupaciones relacionadas con los índices, incluidas las fuentes de datos que los informan y, aunque la literatura publicada, los informes de la CITES y la literatura examinada por pares proporcionan contexto, esta información se utiliza a medida que está disponible y según sea relevante y no puede aplicarse de manera consistente.

<u>Identificación de las Partes que participan en el Proceso del Plan de Acción Nacional para el Marfil por la Secretaría de la CITES</u>

- 12. En el caso de las Partes identificadas en el informe del ETIS a la CoP como Partes que requieren atención, tal como se describe en el paso 1, párrafo a) de las *Directrices*, la Secretaría de la CITES, en cooperación y consulta con la Parte en cuestión, debe determinar si se debe considerar información adicional al elaborar su recomendación al Comité Permanente con respecto a la inclusión de la Parte en el proceso. Si es necesario, la Secretaría puede colaborar con otros expertos y realizar misiones en el país para ayudar en este proceso.
- 13. La Secretaría propone el siguiente proceso en el contexto de los párrafos b) y c) del Paso 1 de las *Directrices*:
 - a) La Secretaría preparará una recopilación de la información del informe ETIS relevante para la Parte en cuestión, destacando las cuestiones clave e invitando formalmente a la Parte a presentar cualquier información adicional que considere relevante para determinar su participación en el proceso del PANM.
 - b) En su carta, la Secretaría solicitará a la Parte interesada que proporcione información adicional y específica centrada en cuestiones clave pertinentes para hacer frente al comercio ilegal de marfil de elefante. Esto incluye legislación y reglamentos, medidas de aplicación a nivel nacional y colaboración interinstitucional; colaboración internacional y regional en materia de aplicación de la ley, y divulgación, concienciación y educación del público. Se pedirá a la Parte que proporcione documentación que corrobore lo anterior a la Secretaría.
 - c) Si la Secretaría considera que se necesita más información para tomar una decisión informada, consultará formalmente con las entidades y expertos pertinentes y llevará a cabo misiones en el país para ayudar en este proceso, según sea necesario.
- 14. Basándose en la <u>plantilla para la elaboración de un Plan de acción nacional para el marfil</u> y en la Orientación a las Partes para la elaboración y aplicación de planes de acción nacionales para el marfil (<u>PANM</u>), las Partes identificadas en los informes del ETIS disponen de orientación que les permite proporcionar a la Secretaría información adicional relevante para el proceso.
- 15. Como se requiere en el paso 1, párrafo c) de las *Directrices para el proceso de los Planes de acción nacionales para el marfil*, la Secretaría formulará una recomendación al Comité Permanente sobre si una Parte debe ser incluida o no en el proceso, teniendo en cuenta el informe del ETIS y la información adicional proporcionada por las Partes.
- 16. A través de este proceso, se espera que el Comité Permanente tenga la información necesaria en relación con todos los aspectos de los PANM para considerar y determinar si una Parte debe participar en el proceso de los PANM o si la Parte parece estar tomando ya todas las medidas necesarias para hacer frente al comercio ilegal de marfil, haciendo innecesario un PANM.

Conclusiones

- 17. La Secretaría propone que TRAFFIC utilice el proyecto de criterios que figuran en el párrafo 9 a) y b) para identificar a las Partes que requieren la atención de TRAFFIC en el contexto del párrafo a) del Paso 1 de las Directrices para el proceso de los planes de acción nacionales para el marfil.
- 18. El Comité Permanente debería considerar si existen preocupaciones relacionadas con la información contextual utilizada por TRAFFIC para fundamentar la categorización y a la que se hace referencia en el párrafo 10 (IPM, IOC, literatura publicada que proporciona información contextual sobre cualquiera de las variables, incluidas las operaciones especiales realizadas en los países para reducir la delincuencia organizada, los casos judiciales notables o la legislación dirigida al marfil ilegal u otro comercio ilegal de especies silvestres, la información basada en análisis forenses y las tendencias en el movimiento de marfil desde los países de origen y exportación, y otra información pertinente de los informes de la CITES y de la literatura de revisión por pares).
- 19. La Secretaría propone en el párrafo 12 el proceso para la aplicación de los pasos 1 b) y c) de las *Directrices*, incluyendo el alcance de la información que se solicitará a las Partes para informar las recomendaciones que se elaborarán para su consideración por el Comité Permanente.

Recomendaciones

- 20. Se invita al Comité de Permanente a:
 - a) examinar el proyecto de criterios que figura en los párrafos 9 a) y b) del presente documento y estar de acuerdo en recomendar la adopción del proyecto de criterios para la categorización de las Partes en la 20ª reunión de la Conferencia de las Partes;
 - b) examinar y ponerse de acuerdo sobre la información contextual del párrafo 10 del presente documento utilizada por TRAFFIC para informar la categorización de las Partes; y
 - examinar y ponerse de acuerdo sobre el proceso propuesto por la Secretaría en el párrafo 13 del presente documento como parte del proceso de consulta con las Partes identificadas en los informes del ETIS en la aplicación de los pasos 1 b) y c) del proceso del PANM.

OVERVIEW OF METHODOLOGIES FOR THE EVALUATION OF PARTIES REQUIRING ATTENTION UNDER THE NATIONAL IVORY ACTION PLAN (NIAP) PROCESS AS PUBLISHED IN THE ELEPHANT TRADE INFORMATION SYSTEM (ETIS) REPORTS TO CITES CONFERENCE OF THE PARTIES

Prepared by TRAFFIC

- 1. This report was prepared by TRAFFIC at the request of the CITES Secretariat in relation to Decision 19.97. It covers the methodologies used to identify CITES Parties requiring attention under the National Ivory Action Plan (NIAP) process as implemented with ETIS reports to each CITES Conference of the Parties (CoP). The purpose of this report is not to track which Parties were identified as requiring attention⁴, but rather to detail the methodologies and processes used to categorize countries in the ETIS report submitted for consideration by the Conference of the Parties to CITES, and how they evolved over time.
- 2. It is noted in the context of Decision 19.97 that no precise definitions were ever published as to what constitutes Parties of NIAP Categories A, B or C. The general naming convention of *most affected (Category A)*, *markedly affected (Category B)*, and *affected (Category C)* was proposed by the Secretariat after consultation with TRAFFIC (see paragraphs 149 and 150 in SC69 Doc. 29.3). The proposal was to change Parties of 'primary concern' to Category A Parties (Category A consists of Parties most affected by the illegal trade in ivory); Parties of 'secondary concern' to Category B Parties (Category B consists of Parties markedly affected by the illegal trade in ivory) and Parties of 'importance to watch' to Category C Parties (Category C consists of Parties affected by the illegal trade in ivory). ETIS was requested to make use of the new names of the categories in reports.
- 3. The categorization by ETIS in the former "categories" was based on 1) initial statistical analysis to identify Parties with similar, low or high trade characteristics (cluster analysis), and 2) quantitative and qualitative assessment of the role of the Party in the illegal ivory trade based on volume and trade links form the ETIS data as well as contextual variables. However, as noted in the ETIS report to CoP19, no specific definitions exist as to "... what most affected, markedly affected, and affected mean in terms of quantifiable illegal trade characteristics" (Cop19 Doc. 66.6).
- 4. It is further noted that the identification of Parties of concern in the illicit trade in ivory in the ETIS reports to CoP have been conducted since CoP12 in 2002. While the Parties used the ETIS report as a foundation to inform processes such as the 'CITES action plan for the control of trade in elephant ivory' adopted at CoP13, this occurred prior to the initial implementation of the NIAP process at SC63 in 2013⁵ and prior to the adoption of the Guidelines for the NIAP Process by CoP17 in 2016.
- 5. Once the NIAP process was established, the methodologies to identify Parties requiring attention under NIAP and the subsequent ETIS reports have been reviewed by the MIKE-ETIS Technical Advisory Group (TAG) before submission to CoP. The remainder of this report covers methodologies and processes implemented as far back as the first ETIS report to CoP12, when Parties of concern in the illegal trade in ivory were first noted.
- 6. This report narrative provides definitions, logic and step by step procedures of the methodology used in each ETIS report to CoP, and it highlights changes made between analyses. Annex 1.1 provides a tabular summary of the methodologies including: the terminology of Parties identified⁶; the cluster analysis steps; the duration of time series used to summarize the ETIS data; the cluster analysis input variables and any conditions as to which Parties were included in the analyses; the dendrogram cut height and number of

4 CITES maintains a website that tracks the history of NIAP process including which Parties participated in NIAP based on the ETIS analysis: https://cites.org/eng/prog/niaps/history_niaps_process

⁵ At SC63 the Standing Committee first requested the Secretariat to help eight Parties in developing national ivory action plans (<u>SC63 Summary Record</u>)

The terminology of Parties identified as requiring attention changed from Parties of primary or secondary concern and Parties to watch to Parties of NIAP categories A (most affected), B (markedly affected) and C (affected) following CoP17 (https://cites.org/eng/prog/niaps/history_niaps_process).

resulting clusters; and the contextual variables used to provide additional information on Parties identified as requiring attention. It is noted that there is a difference between *analysis input variables*, which refers to the variables input to the cluster analysis to arrive to the resulting groupings of Parties based on their illegal ivory trade characteristics, and *contextual variables*, which refers to variables that provided additional context in how to interpret the cluster analysis results in order to identify Parties requiring attention. The exact details for each variable component are described in the methodologies and processes used for each CoP analysis that follows and are summarized in the table in Annex 1.1 of this report.

ETIS report to CoP12

- 7. The first analysis to identify Parties that require attention given illegal ivory trade data related to their country or territory was explained in the ETIS report to CoP12 in 2002 (CoP12 Doc. 34.1). The report laid the foundation to the variable selection and analysis choice that were then used in subsequent CoP reports. The goal of the analysis was to answer the following questions:
 - Which countries or territories are playing leading roles in the illicit trade in ivory?
 - What are the characteristics of this involvement?
- 8. Two analysis approaches were compared: a 7-step decision tree *exploratory analysis* (Annex 1.2) and a *statistical cluster analysis*. Both approaches resulted in similar identification of Parties requiring attention, and the authors of the ETIS report to CoP12 recognized that the selection of criteria thresholds in the exploratory analysis can be subjective and arbitrary. Therefore, only the statistical cluster analysis was carried forward in subsequent ETIS reports to CoP.

Statistical cluster analysis

9. **Input data.** The input data summarized for each Party consisted of seizures made within country or territory (hereafter referred to as *seizure in*) and of seizures in which the Party was implicated along the trade chain as a country or territory of origin, re-export, export, or destination (hereafter referred to as *seizure out*). Seizure in and seizure out data were summarized for the following data elements:

- Frequency, or the number of seizures in or seizures out summarized across a specified time frame (sz-in or sz-out):
- Scale, or the total kg weight of raw ivory equivalent⁷ volume represented in the sz-in and sz-out data (wt-in or wt-out);
- Period of most activity, or a measure of difference in volume traded between early and more recent periods represented in the ETIS data; periods were defined as a yearly range for each analysis and were applied for all Parties.
- 10. General approach. Input variables derived based on these data element definitions were analyzed using an agglomerative hierarchical clustering approach and the Ward's method to identify groups of countries or territories with similar patterns of seizure data (see section A Word on Statistical Methods in Annex 2 of CoP12 Doc. 34.1). Under this statistical cluster algorithm, an initial group or cluster of two Parties was identified by calculating the Euclidean distance between the input variables of each pair of Parties and choosing the pair with the smallest distance. Subsequent groupings were made in the algorithm processing by adding Parties to cluster groups to minimize the within-cluster sum of squared errors. The algorithm results were reported as the grouping of Parties into relatively homogeneous groups with regards to the input variables, while maintaining differences between groups.
- 11. The resulting clustering was graphically displayed as a dendrogram (e.g., Figure 4 in Annex 2 of CoP12 Doc. 34.1; Annex 1.3 of this report) such that the hierarchical structure and grouping of Parties can be deduced. A cut was determined post-hoc at a height of vertical separation of five units⁸, resulting in 13 cluster groups. It is noted that while the dendrogram cut-off value chosen was primarily based on what

Raw Ivory Equivalent (RIE) weight refer to the adjusted weight for worked ivory pieces after accounting for 30% wastage as detailed in Annex 1c of SC74 Doc. 68.

See Annex 1.3 of this document for an explanation on the influence of dendrogram cut height on the grouping and classification of Parties based on their illegal trade characteristics.

was considered to be useful for interpreting the dendrogram results, the cut-off height did not affect the structure of the dendrogram or the position of any country in it; rather it simply determined the number of cluster groups for describing the ivory trade characteristics (see detailed explanation in Annex 1.3 of this report). Once cluster groups were identified, their main characteristics were summarized for contextual data that consisted of: analysis input variables that informed the cluster analysis (i.e., mean no. of seizures, mean weight kg) and additional contextual variables (also referred to in the report as subsidiary data; i.e., mean Corruption Perception Index of Transparency International, mean law enforcement ratio, mean market score)⁹.

- 12. It is stressed that only analysis input variable informed the cluster analysis and the resulting grouping of Parties, and that the contextual variables were used in the interpretation of cluster analysis results to further refine Parties of concern (e.g., for a given Party with similar input variable data characteristics, a country may be identified as being of higher concern if its law enforcement efforts are low, and mean market score is high). It is also important to note that the interpretations informing the identification of Parties of concern were made for each country or territory separately as appears in the narrative of the CoP report; however, for ease of reporting, data were summarized collectively for each group in Table 7 of the ETIS report to CoP12 (Annex 2 of CoP12 Doc. 34.1).
- 13. **Step-by-step analysis.** With the analysis input variables and statistical methods defined, the following three steps were used to identify Parties of concern in the illegal ivory trade:
 - Preliminary data screening countries or territories were included in the cluster analysis if they had at least 20 seizure cases and 100 kg of raw ivory equivalent seized as reported in the ETIS database from 1989 – 2002. This step was used to remove countries or territories with a relatively insignificant role in the illegal ivory trade.
 - 2) *Preliminary cluster analysis* to further refine the identification among remaining countries or territories, an initial cluster analysis focused on the following weight input variables:

wt.in.1 = total weight from sz-in made between 1989-1995

wt.out.1= total weight from sz-out made between 1989-1995

wt.in.2 = total weight from sz-in made between 1996-2002

wt.out.2= total weight from sz-out made between 1996-2002

wt.dif = change in total weight from seizures made between 1989-1995 and those made between 1996-2002

The period breaks (1989–1995 and 1996–2002) were justified based on change in data collection methodology, overall change in patterns of activity in ivory trade, and the change in listing of some elephant populations into Appendix II in the latter period. The preliminary cluster analysis resulted in two groups of countries or territories with relatively lower, and higher, mean weight and number of seizures.

3) Final cluster analysis – the countries or territories with the higher values based on the preliminary cluster analysis were analyzed using the following five variables derived from the most recent ETIS data (1996 – 2002):

sz.in = total number of sz-in

sz.out = total number of sz-out

sz.ratio = ratio of sz.in/(sz.in + sz.out) to indicate law enforcement effort

wt.in = total weight (raw ivory equivalent) from sz-in

wt.out = total weight (raw ivory equivalent) from sz-out

14. To further examine the characteristics of the resulting 13 groups of countries or territories, *frequency*, *scale*,

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Readers are referred to Annex 2 of CoP12 Doc. 34.1 for additional information on the derivation of law enforcement ratio (similar to current ETIS analyses e.g., CoP19 Doc. 66.6) and on the derivation of market scores (Table 6 in Annex 2 of CoP12 Doc. 34.1) and to Annex 1 of CoP12 Doc. 34.1 for reference on sources and detailed description of derivation of other ETIS subsidiary data components referenced in this report.

and *period of most activity* variables were summarized for each of the clusters (Table 7 in Annex 2 of CoP12 Doc. 34.1). Additionally, contextual variable information based on the subsidiary databases were also presented for each group. The report authors discussed the results for each cluster and identified eight Parties that have "most problematic characteristics" or of "major concern" and additional Parties with "pivotal countries or territories, which have the potential for fairly rapid movement into the above mentioned groups". These identified Parties consisted of the higher illegal trade characteristics as indicated in their dendogram grouping (Figure 4 in Annex 2 of CoP12 Doc. 34.1) and had lower degree of enforcement (as indicated by the *law enforcement effort* contextual variable; Annex 1 of this report), higher degree of corruption (as indicated by the *CPI* contextual variable), and higher market scores (as indicated by the Market Score contextual variable).

15. It is noted that while authors explain the degree of contextual variables that contributed to the grouping of Parties requiring attention, e.g., "largest unregulated ivory markets" or "poor law enforcement effort and efficiency", no precise thresholds of inclusion or exclusion in the categorization were specified (but see general relationship with each contextual variable as indicated in Table A1 in Annex 1.1 of this report). Additionally, unlike the exploratory analysis that was also presented in the CoP12 ETIS report and is detailed in Annex 1.2 of this report, in which countries of primary or secondary concern were identified, no conclusive final list of Parties requiring attention was provided based on the cluster analysis.

ETIS report to CoP13

- 16. The CoP12 report laid the foundation for the analyses to identify Parties requiring attention given their role in the illegal ivory trade. As previously mentioned, it was recognized that the cluster analysis is a more robust statistical method that has less subjective intervention than the 7-step exploratory analysis; hence, starting with the ETIS report to CoP13, only the cluster analysis was used in subsequent reports to identify Parties requiring attention. Additionally, as more data were collected and time series to be analyzed increased, there were slight modifications between analyses as to the definitions of period breaks (Annex 1 of this report). Finally, slight modifications were made to the definitions and bias-adjustment of the analysis input variables informing the cluster analysis as follows:
 - In the *preliminary cluster analysis*, instead of using the total weight differences between two periods (1989 1995 and 1996 2002), a weight ratio (*wt.ratio*) variable was introduced; the latter was calculated as the ratio of the total weight in the second period of the analysis over the total weight in the whole period of the analysis.
 - Additional steps were introduced between the *preliminary cluster analysis* as an attempt to account for differences in the data when considering varying reporting and seizure efforts by different Parties. Three steps were used to bias-adjust for variability in the seizure in data across Parties: 1) the number of seizures was regressed against two subsidiary variables, *ETIS data collection score* (DCS) and *Corruption Perception Index* (CPI); 2) a standardized number of seizures for each country or territory and year was calculated as the difference between the reported and predicted (based on the regression) number of seizures; 3) the total standardized number of seizures for the country was summed across all years. A similar approach was used for the adjusted total weight of seizures, where only *DCS* was used in the regression because *CPI* was not a significant predictor of the weight seized.
- 17. Similarly to the CoP12 report, the cluster analysis dendrogram was "cut" at the 2.5 unit height resulting in 13 clusters. Each cluster was described in terms of contextual variables and six Parties "most implicated in the illicit trade in ivory" were identified as well as a group of Parties that were "playing important roles in the trade". The differentiation between these categories of Parties was determined similarly to the previous report by factoring in the results of the cluster analysis with the degree of the contextual variables (Annex 1.1), but no precise thresholds for inclusion into categories of concern were set or specified.

ETIS report to CoP14

- 18. The cluster analysis methodology in the ETIS report to CoP14 followed the same methodologies used in the CoP13 report with the following changes:
 - In the *preliminary cluster analysis*, the *wt.ratio* variable was defined as the ratio of total weight between the earlier (1989 1997) and the more recent (1998 2006) reporting periods.

- The domestic ivory market score (*dims*)¹⁰ was included as an input variable in the *final cluster* analysis. The *dims* variable was constructed based on the number of items offered for sale and their weight as detected in market monitoring surveys, as well as scoring of Parties' compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets (described in detail in Annex 1 of CoP12 Doc. 34.1, and Table 6 in Annex 2 of CoP12 Doc. 34.1).
- 19. A cut was made at the 3.5 unit height of the resulting dendrogram, creating 13 clusters. Contextual variables data were used to discuss each cluster and five Parties that were "most heavily implicated in the illicit trade" were identified along with Parties "playing important roles in the illicit ivory trade" and a group of Parties "to be monitored closely" were also noted. Again, the differentiation among these categories of Parties was determined by factoring in the results of the cluster analysis with the degree of contextual variables (Annex 1), but no precise thresholds for inclusion into categories of concern were set or specified.

ETIS report to CoP15

- 20. The cluster analysis methodology in the ETIS report to CoP15 followed the same methodologies used for the CoP14 report with the introduction of an additional contextual covariate, *large-scale seizures (LSSZ)*. LSSZ was constructed to account for the presence of organized criminal activity in the illicit ivory trade. The variable was calculated as the percentage of the trade volume (kg) that consisted of large seizures equal to or greater than one tonne in total raw ivory equivalent weight¹¹.
- 21. The dendrogram was cut at a height of 3.5 units to provide 14 clusters. Countries or territories in each cluster were reviewed based on contextual covariates including LSSZ, and Parties most heavily implicated, or of secondary level of concern, or where illicit ivory trade remains a persistent challenge were identified in the report. Similar to previous analyses, the differentiation among these categories of Parties was determined by factoring in the results of the cluster analysis with the degree of contextual variables (Annex 1.1), but no precise thresholds for inclusion into categories of concern were set or specified.

ETIS report to CoP16

- 22. The CoP16 analyses represented the first time when the output transaction indices from the trend analysis were used as input variables to the cluster analysis. Therefore, the preliminary data screening and biasadjustment steps were removed as they were already included as part of the trend analyses. Additionally, a preliminary cluster analysis focused on weight variables was not performed; instead, variables related to large scale seizures equal to or greater than one tonne in weight were included as input data to the cluster analysis. The revised methodologies had the following analysis steps:
 - 1) Trend analysis using Bayesian hierarchical modeling was used to bias-adjust ETIS data for seizure and reporting rates. Law enforcement ratio based on ETIS data and the World Bank's rule of law covariates were used to model seizure rate, while the variables of ETIS data collection effort score and CITES annual reporting scores were used to model reporting rate. Model outputs were relativized to the 1998 level, which was set to 100, as this represented the first full year after the adoption of Res. Conf. 10.10, the transfer of three African elephant population from Appendix I to Appendix II, and the development of ETIS. Model outputs were reported as Transaction Indices that were estimated for six ivory class and weight categories: small (less than 10 kg), medium (10 kg to 100 kg), and large (100 kg or more) for raw and worked ivory. The Transaction Indices for each category were used as input variables to the cluster analysis.
 - 2) Cluster analysis using the following input variables for the years 2009 2011:

Transaction Index by ivory type and weight class (six variables)

Total number of large seizures over one tonne in total weight (raw and worked combined)

As specified in Annex 1 of CoP12 Doc. 34.1, the domestic ivory market score (dims) was based on the Domestic Ivory Markets Database, "...a component of ETIS to track the relative scale of major domestic ivory markets globally" that consisted of results of recent market survey studies. Additionally, cumulative scoring of compliance was done in relation to how Parties with domestic ivory markets complied on activities specified by Res. Conf. 10.10. (Rev) as requiring attention including registration of dealers, having adequate trade controls, effective reporting and effective enforcement (see example in Table 6 of Annex 2 of CoP12 Doc. 34.1).

It is noted that the threshold of large seizures was not incorporated into Res. Conf. 10.10 until Rev. CoP16, when Parties adopted a 500kg threshold to identify large seizures in the context of forensic analysis (see paragraph 53.2 of CoP16 Com. II Rec. 6 (Rev. 1), CoP16 Comm. II 26, and Res. Conf. 10.10 (Rev. CoP16)).

Total weight of large seizures over one tonne Total number of sz-out Total weight of sz-out

23. The resulting dendrogram was cut at the 5-unit height resulting in 12 clusters. The same contextual covariates were used to discuss countries or territories in each cluster group, with the exception that the *rule of law* variable was used instead of *CPI*, as the former was used instead of the latter in the bias-adjustment step. Two Parties were identified as *most heavily implicated*, with ten additional Parties identified as *a "secondary level of concern as they repeatedly play important supporting roles in the illicit ivory trade*. Similar to previous analyses, the differentiation among these categories of Parties was done factoring in the results of the cluster analysis with degree of contextual variables' value (Annex 1), but no thresholds for inclusion into categories of concern were set or specified.

ETIS report to CoP17

- 24. The following changes to the methodologies noted in the ETIS report to CoP17 were mostly related to the trend analyses that informed the input variables of the cluster analysis:
 - The analysis time frame was restricted to start in 2007 as it was seen as an infliction point based on previous trend analyses, and it was the year just before the one-off sale of ivory that took place in 2008. The transaction indices were therefore relativized to the first year in the time series, 2007.
 - The medium and large weight categories for worked ivory were unified into one large worked ivory category, as it was deemed that 10 kg, which was used as the lower limit of the medium category, is already a very large weight of worked ivory.
 - A selection criterion was introduced to determine which countries or territories to include in the trend (and therefore also cluster) analysis; the score was based on the number of seizures a Party makes (or is implicated in along the trade route) in each weight category, and a threshold score of 100 was selected for inclusion in the analysis.
 - For the bias-adjusting step of the trend analysis, only *law enforcement ratio* was selected as a predictor of seizure rates, while both *CITES annual reporting score* and *Data collection effort score* were maintained as predictors for reporting rates.
- 25. The remaining methodologies of the cluster analysis steps followed those used in the CoP16 report where: the same input variables were used, analysis was focused on the most recent 3 years of complete data, a 5-unit height cut was applied to the resulting dendrogram resulting in 13 clusters, and the same contextual variables were discussed for each cluster. It is noted that for the first time in the CoP17 report, the Parties in the 13 resulting clusters were listed under "Countries of primary concern", "Country of secondary concern", and "Countries important to watch" sections of the report, with African and Asian Parties noted under each category. Similar to previous analyses, the differentiation among these categories of Parties was determined by factoring in the results of the cluster analysis with degree of contextual variables (Annex 1.1), but no precise thresholds for inclusion into categories of concern were set or specified.

ETIS Report CoP18 Doc. 69.3 (Rev. 1)

- 26. The analysis approach established in CoP1 was followed for the CoP18 report with few methodology changes:
 - A new covariate, *Trade Chain Index (TCI)*, was introduced to model seizure rate in the trend analysis to account for the fact that destination Parties may have higher law enforcement ratios simply because a shipment is less likely to leave their borders. The index characterizes the Party's role on the trade chain as a ratio of destination and non-destination scores.
 - The input data to the cluster analysis summarizing frequency and scale of large seizures was calculated at a threshold of 500 kg rather than one tonne of total seizure weight. Additional variables summarizing the bias-adjusted seizures out and the weights in and out both above and below this 500 kg threshold were introduced.
 - The Corruption Perception Index was used in place of the rule of law as a contextual covariate.

27. The dendrogram was cut at the 5-unit height resulting in 15 clusters, which were reviewed in the context of input data and additional information. For the first time, and following amendments to Res. Conf. 10.10 (Rev. CoP17), Parties were listed as requiring attention under the NIAP process as category A (most affected), B (markedly affected), or C (affected) Parties. Similar to previous analyses, the differentiation among these categories of Parties was determined by factoring in the results of the cluster analysis with degree of contextual variables (Annex 1.1), but no precise thresholds for inclusion into categories were set or specified as no published criteria for inclusion as NIAP Categories A, B, or C existed.

ETIS Report CoP19 Doc. 66.6

- 28. Methodologies used in the ETIS report to CoP19 were similar to those used in the CoP18 report with the omission of market scores and large-scale seizure to mean weight (LSSZ) as contextual variables and the addition of *Organized Crime Index* as a new contextual variable. Additionally, the cluster analysis input variables were displayed as a heat map depicting the dendrogram results whereby Parties with relatively lower input data values (yellows) were differentiated from those with relatively higher input data values (reds). Similar to CoP18 analyses, the dendrogram was cut at the 5 unit level resulting in 15 clusters, and Parties with higher input variables relating to seizures out (i.e., seizures of 500kg or more that implicated the Parties on the trade chain) were identified as A or B categories (left of dashed line in Figure 4.B in CoP19 Doc. 66.6).
- 29. As in previous analyses, to further differentiate Parties requiring attention under the NIAP process as *NIAP Category A, B,* or *C,* the results of the cluster analysis were factored in with degree of contextual variables, but no precise thresholds for inclusion into categories were set or specified as no published criteria for inclusion as NIAP Categories A, B, or C existed. However, report authors added that "...more refinements might be made in future assignments of Parties under the NIAP process to Category C, as well as Categories A and B, as better definitions are developed by the Parties as to what *most affected, markedly affected*, and *affected* mean in terms of quantifiable illegal trade characteristics."

Annex 1.1 – Summary table of methodological approaches to identify Parties that require attention based on their data on illegal ivory trade as summarized in the ETIS reports to the CITES Conference of the Parties. Party categorization refers to the terminology used to identify Parties requiring attention based on the characteristics of their illegal trade in ivory. Variable names are in bold, and grey highlights indicate a difference from the previous report. Unless otherwise specified, sz-in and wt-in refer to seizures made and total weight within the country or territory, and sz-out and wt-out refer to the total number of seizures and total weight for seizures in which the country or territory was implicated along the trade chain. Contextual variables listed are in addition to the *frequency*, *scale*, and *period of most activity* variables which were derived based on the input ETIS data to the cluster analysis. An asterisk near the time series range denotes that the most recent year(s) of ETIS data were dropped due to incomplete data.

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
CoP12 Doc. 34.1 Parties requiring attention were not listed with the cluster analysis in this report (but Parties of primary or of secondary concern were listed with	Initial screening 2. Preliminary cluster analysis	1989 – 2002 1989 – 1995 1996 – 2002	Include if: ≥20 total sz-in and sz-out AND ≥100kg total wt-in and wt-out wt.in.1: Total weight of sz-out 1989-1995 wt.out.1: Total weight of sz-out 1989-1995 wt.in.2: Total weight of sz-in 1996-2002 wt.out.2: Total weight of sz-out 1996-2002 wt.out.2: Total weight of sz-out 1996-2002 wt.dif: Change in total weight from 1989-1995 to		
the exploratory analysis detailed in Annex 1.2 of this report)	3. Final cluster analysis	1996 – 2002	sz.in: total no. of sz-in sz.out: total no. of sz-out sz.ratio: ratio of sz-in/(sz-in+sz-out) wt.in: total weight (RIE) of sz-in wt.out: total weight (RIE) of sz-out	5 units, 13 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.

CoP Report and Party categorization	Cluster Time series Analysis input variables and conditions orization analysis considered steps		analysis considered steps		Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
CoP13 Doc. 29.2 Parties most highly	Initial screening	1989 – 2004	Include if: ≥20 total sz-in and sz-out AND ≥100kg total wt-in and wt-out			
implicated or of important role in trade	2. Preliminary cluster analysis	1989 – 1996 1997 – 2004	wt.in.1: Total weight of sz-in 1989-1996 wt.in.2: Total weight of sz-in 1997-2004 wt.out.1: Total weight of sz-out 1989-1996 wt.out.2: Total weight of sz-out 1997-2004 wt.ratio: ratio of total weight in 1997-2004 to total weight in 1989-2004			
	3. Final cluster analysis	1997 – 2002*	sz.in.adj: standardized no. of sz-in as the difference between the reported sz-in and the predicted sz-in based on linear regression: sz-in ~ Data collection score (DCS) + Corruption Perception Index (CPI) sz.out: total no. of sz-out sz ratio: ratio of sz-in/(sz-in+sz-out) wt.in.adj: standardized wt-in as the difference between the reported wt-in and the predicted wt-in based on linear regression: wt-in ~ Data collection score (DCS) wt.out: total weight (RIE) of sz-out	2.5 units, 13 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.	
CoP14 Doc. 53.2 Parties most heavily	1. Initial screening	1989 – 2006	Include if: ≥20 total sz-in and sz-out AND ≥100kg total wt-in and wt-out			
implicated, of important role in trade or to be closely monitored	2. Preliminary cluster analysis	1989 – 1997 1998 – 2006	 wt.in.1: Total weight of sz-in 1989-1997 wt.in.2: Total weight of sz-in 1998-2006 wt.out.1: Total weight of sz-out 1989-1997 wt.out.2: Total weight of sz-out 1998-2006 wt.ratio: ratio of total weight in 1989-1997 to total 			

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
	3. Final cluster analysis	1998 – 2006	weight in 1998-2006 sz.in.adj: standardized no. of sz-in as the difference between the reported sz-in and the predicted sz-in based on linear regression: sz-in ~ Data collection score (DCS) + Corruption Perception Index (CPI) sz.out: total no. of sz-out sz ratio: ratio of sz-in/(sz-in+sz-out) wt.in.adj: standardized wt-in as the difference between the reported wt-in and the predicted wt-in based on linear regression: wt-in ~ Data collection score (DCS) wt.out: total weight (RIE) of sz-out dims: domestic ivory market score	3.5 units, 13 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.
CoP15 Doc. 44.1 Parties most heavily	1. Initial screening	1989 – 2009	Include if: ≥20 total sz-in and sz-out AND ≥100kg total wt-in and wt-out		
implicated, or of secondary level of concern, or where illicit trade remains a persistent challenge	Preliminary cluster analysis	1989 – 1998 1999 – 2009	wt.in.1: Total weight of sz-in 1989-1998 wt.in.2: Total weight of sz-in 1999-2009 wt.out.1: Total weight of sz-out 1989-1998 wt.out.2: Total weight of sz-out 1999-2009 wt.ratio: ratio of total weight in 1989-1998 to total weight in 1999-2009		
	3. Final cluster analysis	1999 – 2009	sz.in.adj: standardized no. of sz-in as the difference between the reported sz-in and the predicted sz-in based on linear regression: sz-in ~ Data collection score (DCS) + Corruption Perception Index (CPI) sz.out: total no. of sz-out sz ratio: ratio of sz-in/(sz-in+sz-out) wt.in.adj: standardized wt-in as the difference	3.5 units, 14 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input. A higher

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
			between the reported wt-in and the predicted wt-in based on linear regression: wt-in ~ Data collection score (DCS) wt.out. total weight (RIE) of sz-out dims: domestic ivory market score		score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Percentage of large-scale seizures to mean weight (LSSZ): the percentage of the traded weight generated by seizures equal to or greater than one tonne of RIE in weight; a higher score indicates larger involvement of organized crime in the illegal trade. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.
CoP16 Doc. 53.2.2 (Rev. 1) Parties most heavily implicated of major concern, transit Parties of concern, source Parties of greatest concern, or Parties of secondary level of concern ¹²	1. Trend analysis	1996 – 2011*	Bias adjustment variables: Law enforcement ratio 1-year lag effect: ratio of sz-in/(sz-in+sz-out) based on previous year's data Rule of law: from the World Bank's governance indicators CITES annual reporting score: the number of years the Party has submitted an annual report to CITES over the total number of years the Party has been a signatory to CITES. Data collection effort score: describing the process under which the ETIS data were collected: targeted, routine, prompted or passive.		
	Cluster	2009 – 2011	transaction indices: by ivory type and weight class	5 units, 12	Rule of law: from the World Bank's

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In Paragraph D of the Comments from the Secretariat in CoP16 Doc. 53.3.3. (Rev. 1), the Secretariat categorized as Parties of primary concern the nine countries or territories categorized by the ETIS report as most heavily implicated or of major concern, transit Parties of concern, source Parties of greatest concern. The 10 countries or territories categorized as secondary concern in the ETIS report remained referenced as Secondary concern so in the Secretariat's Comments.

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
	analysis		as derived from trend analysis results seizures >1 tonne: total number of large seizures over 1 tonne weight >1 tonne: total weight of large seizures over 1 tonne sz-out: total number of seizures out wt-out: total weight of seizures out	clusters	governance indicators. A higher score indicates better rule of law. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Percentage of large-scale seizures to mean weight (LSSZ): the percentage of the traded weight generated by seizures equal to or greater than one tonne of RIE in weight; a higher score indicates larger involvement of organized crime in the illegal trade. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.
CoP17 Doc. 57.6 (Rev. 1) Parties of Primary concern, Secondary concern, and Important to watch	1. Trend analysis	2007 – 2014*	Inclusion criterion: Sum of inclusion criterion score is ≥100 points, where 1 point, 10 points, or 100 points are respectively given for every implicated seizure in small, medium and large weight classes.		
			Bias adjustment variables: Law enforcement ratio 1-year lag effect: ratio of sz-in/(sz-in+sz-out) based on previous year's data CITES annual reporting score: the number of years the Party has submitted an annual report to CITES over the total number of years the Party has been a signatory to CITES. Data collection effort score: describing the process		

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual variables presented for each cluster group to provide additional information on Parties identified as requiring attention
			under which the ETIS data were collected: targeted, routine, prompted or passive.		
	2. Cluster analysis	2012 – 2014	transaction indices: by ivory type and weight class as derived from trend analysis results seizures >1 tonne: total number of large seizures over 1 tonne weight >1 tonne: total weight of large seizures over 1 tonne sz-out: total number of seizures out wt-out: total weigh to of seizures out	5 units, 13 clusters	Rule of law: from the World Bank's governance indicators. A higher score indicates better rule of law. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Percentage of large-scale seizures to mean weight (LSSZ): the percentage of seizures equal to or greater than one tonne of RIE in weight; a higher score indicates larger involvement of organized crime in the illegal trade. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in narrative to each cluster.
CoP18 Doc. 69.3 (Rev. 1) Parties of NIAP Category A (most affected), B (markedly affected), or C (affected) as defined in Annex 3 of Res. Conf.	1. Trend analysis	2008 – 2017	Inclusion criterion: Sum of inclusion criterion score is ≥100 points, where 1 point, 10 points, or 100 points are respectively given for every implicated seizure in small, medium and large weight classes. Bias adjustment variables: Law enforcement ratio 1-year lag effect: ratio of sz-in/(sz-in+sz-out) based on previous year's data Trade chain index (TCI): characterizes a Party's role in the illegal trade chain.		

CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
10.10 (Rev. CoP17). ¹³			CITES annual reporting score: the number of years the Party has submitted an annual report to CITES over the total number of years the Party has been a signatory to CITES. Data collection effort score: describing the process under which the ETIS data were collected: targeted, routine, prompted or passive.		
	2. Cluster analysis	2015 – 2017	transaction indices: by ivory type and weight class as derived from trend analysis results sz-out <500 kg: total of seizures out less than 500 kg sz-out ≥500 kg: total of seizures out over 500 kg wt-in <500 kg: total of weights in less than 500 kg wt-in ≥500 kg: total of weights in over 500 kg wt-out <500 kg: total of weights out less than 500 kg wt-out ≥500 kg: total of weights out over 500 kg	5 units, 13 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Percentage of large-scale seizures to mean weight (LSSZ): the percentage of seizures equal to or greater than one tonne of RIE in weight; ; a higher score indicates larger involvement of organized crime in the illegal trade. Market Score: constructed based on the no. of items and weight detected in market surveys as well as scoring of compliance with Res. Conf. 10.10 regulations of legal domestic ivory markets. A total higher score indicates more ivory was detected at the markets and lower compliance was recorded with the regulation of the markets. Reporting status: to ETIS as detailed in

Following Decision 17.74 and as reported at SC69, the Secretariat reviewed current names of the categories used in the ETIS report and suggested that Parties of primary concern become Category A Parties (most affected by the illegal trade in ivory), Parties of secondary concern become Category B Parties (markedly affected), and Parties of importance to watch become Category C Parties (affected). No additional information on the definition of these categories was provided. The Standing Committee adopted the Secretariat's recommendation and requested ETIS to use the new names in future ETIS reports.

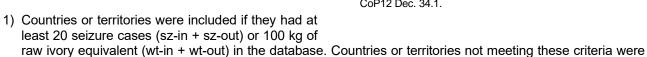
CoP Report and Party categorization	Cluster analysis steps	Time series considered	Analysis input variables and conditions	Dendrogram cut height and no. of clusters	Contextual <i>variables</i> presented for each cluster group to provide additional information on Parties identified as requiring attention
CoP19 Doc. 66.6 Parties of NIAP Category A (most affected), B (markedly affected), or C (affected) as defined in Annex 3 of Res. Conf. 10.10 (Rev. CoP18).	1. Trend analysis	2008 – 2020	Inclusion criterion: Sum of inclusion criterion score is ≥100 points, where 1 point, 10 points, or 100 points are respectively given for every implicated seizure in small, medium and large weight classes. Bias adjustment variables: Law enforcement ratio 1-year lag effect: ratio of sz-in/(sz-in+sz-out) based on previous year's data Trade chain index (TCI): characterizes a Party's role in the illegal trade chain. CITES annual reporting score: the number of years the Party has submitted an annual report to CITES over the total number of years the Party has been a signatory to CITES. Data collection effort score: describing the process under which the ETIS data were collected: targeted, routine, prompted or passive.		narrative to each cluster.
	2. Cluster analysis	2018 – 2020	transaction indices: by ivory type and weight class as derived from trend analysis results. sz-out <500 kg: total of seizures out less than 500 kg sz-out ≥500 kg: total of seizures out over 500 kg wt-in <500 kg: total of weights in less than 500 kg wt-in ≥500 kg: total of weights in over 500 kg wt-out <500 kg: total of weights out less than 500 kg wt-out ≥500 kg: total of weights out over 500 kg	5 units, 15 clusters	Corruption Perception Index (CPI): proxy to measure law enforcement efficiency. A higher score indicates the country is perceived as having less corruption. Law enforcement effort: ratio of sz-in/(sz-in+sz-out); same as sz.ratio input variable. A higher score indicates better law enforcement effort at intercepting seizures that originate, are exported, transited or destined to the country. Organized Crime Index: a measure of the level of organized crime within each country or territory. A higher score indicates higher levels of organized crime. Reporting status: to ETIS as detailed in narrative to each cluster.

Annex 1.2 - Description of Exploratory analysis implemented in the ETIS report to CoP12.

Figure A2.1 (originally Figure 3 in Annex 2 of CoP12 Doc. 34.1) outlines the steps of the exploratory analysis based on summaries of ETIS data ranging from 1989 - 2002. The criteria for inclusion at each step related to ETIS data elements summarized for each Party while taking into account seizures made by the Party in country or territory (sz-in) as well as those that implicated the Party on the trade chain (sz-out). The definition of the data elements were:

- Frequency, or the number of sz-in + sz-out summarized across a specified time series;
- Scale, or the total kg weight of raw ivory equivalent¹⁴ volume represented in the sz-in and sz-out;
- Period of most activity, or a measure of difference in volume traded between early (1989 – 1995) and more recent (1996 – 2002) periods represented in the ETIS data.

Using these three variables, the following seven steps were implemented to differentiate countries or territories of *primary* and *secondary concern* among over 150 countries or territories that were represented in the illegal ivory trade data in the ETIS database:



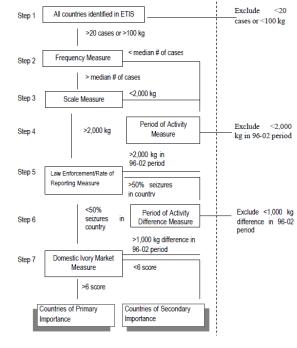


Figure A2.1. The exploratory model for identifying countries of primary and secondary importance as published originally in CoP12 Dec. 34.1.

- excluded from further consideration.

 2) Remaining countries or territories were included if they had at least 55 seizure cases: 55 was chosen as it
- 3) Remaining countries or territories were included if the total volume of ivory trade exceeded 2,000 kg. It is noted that the median of the distribution of total volume of ivory trade per country or territory was 5,000 kg, but this was determined to be too high, and 2,000 kg was used as a criterion instead.

was the median of the number of seizure cases per country or territory in the database.

- 4) Excluded countries or territories from step 2 and 3 were re-evaluated in terms of shifts in periods of activity in the illegal trade summarized for the periods 1989 1995 and 1996 2002; if the difference in the total volume of trade between the more recent and the less recent periods was greater than 2,000 kg, then the country or territory was added to the remaining countries or territories under consideration.
- 5) Remaining countries or territories were included if their law enforcement ratio, calculated as sz-in/(sz-in+sz-out), was less than 50%.
- 6) Excluded countries or territories from step 5 were re-evaluated in terms of shifts in periods of activity in the illegal trade summarized for the periods 1989 1995 and 1996 2002. This is similar to step 4, only the criterion to include countries or territories was a total difference of more than 1,000 kg.
- 7) Using the subsidiary data in ETIS on domestic ivory markets, a domestic ivory market score was used to evaluate the Parties. The score was a sum of a market monitoring score for the number and total weight of ivory products found based on market surveys, as well as scoring of compliance with the directive of Res. Conf. 10.10. (Rev.) in terms of registrations, controls, reporting and effective enforcement of domestic ivory markets (see Table 6 in Annex 2 of CoP12 Doc. 34.1). Using the cumulative final score, the remaining countries or territories were considered as *Countries of Primary Importance* if they had a score of 6 or more, while countries with a score of less than 6 were defined as *Countries of Secondary Importance* (Table 6 of CoP12 Doc. 34.1).

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¹⁴ Raw Ivory Equivalent (RIE) weight refer to the adjusted weight for worked ivory pieces after accounting for 30% wastage as detailed in Annex 1c of SC74 Doc. 68.

Annex 1.3 – A note about the selection of cut height on the cluster analyses dendrogram.

The cluster analysis produces the dendrogram presented in the ETIS reports to CoP whereby, based on input variables summarizing ETIS data for each Party, clustering or grouping of Parties with similar illegal ivory trade characteristics is produced (Burn and Underwood (2013), Underwood et al. (2013), CoP19 Doc. 66.6). Parties with relatively low input values are grouped together, and the dendrogram cut-off values (or cut height) determines the resulting number of groups. As explained in SC69 Inf. 22, the cut-off is determined post-hoc once the dendrogram has been produced; it is a relative measure and the value chosen is primarily based on what is considered to be useful for interpreting the results. Determination of the cut-off point is not a technical statistical decision, nor is it necessarily based on previous analyses, and all ETIS reports have described between 12 and 15 clusters. Importantly, and as depicted in Figure A3.1, the cut-off point doesn't affect the structure of the dendrogram or the position of any country in it; rather it simply determines the number of clusters for describing the ivory trade characteristics. The dendrogram is purposely included in the report so that Parties can see for themselves the similarities and differences between countries and assess how changing the cut-off would alter the number of groups.

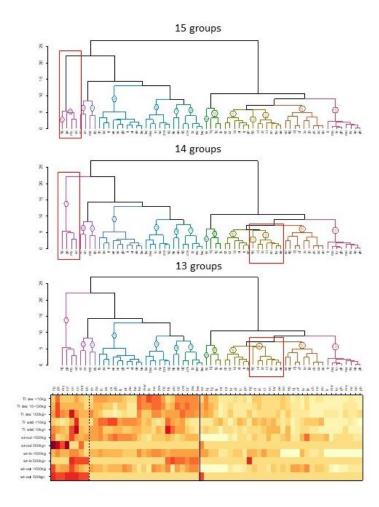


Figure A3.1 – Three different cluster analysis dendrogram cut-off heights resulting in 13, 14, and 15 cluster groups based on illegal ivory trade characteristics for data analyzed for the ETIS report for CoP19 (CoP19 Doc. 66.6). Input variables used in analysis are depicted in heatmap at bottom panel while the dendrograms are specified at different cut height to produce 13 – 15 groups. As the number of groups changes, the order of the countries remains the same. Red rectangles demonstrate the change in clustering with different number of groups.

ETIS - CATEGORISATION OF PARTIES: CoP16 to CoP19

Prepared by the CITES Secretariat and TRAFFIC

CoP	Notes re: analysis	Country / -ies	Justification
CoP16	Transaction Index - new feature in ETIS analysis:	Priorities of greatest concern	
CoP16 Doc. 53.2.2	Depicts global illegal ivory trade in 6 ivory type and weight	in the illicit trade in ivory:	Measure of scale (Mean weight): from 10,923 to 28,804kg
(Rev. 1)	categories and provides a measure of the frequency of	Thailand,	Percentage of weight in recent period: 75 – 83
	raw and worked ivory transactions occurring from 1996	Malaysia,	Percentage of large-scale ivory seizures to mean weight: 0.65 – 0.94
[NIAP process initiated	onwards.	Philippines,	Mean market score: 5.7 – 7.5 (one cluster with Hong Kong SAR, ZA, KE, TZ
at CoP16 where		Viet Nam,	with mean market score of 1.6 – lower than other clusters)
Decisions were adopted	The 6 ivory type and weight categories are:	Hong Kong SAR of China,	
relating to engagement	- Raw <10 kg	South Africa,	These groups are regularly involved in illicit ivory trade and collectively account
with Parties of	- Worked <10 kg	Kenya,	for three quarters of the total mean weight of the ivory represented by the ETIS
secondary concern to	- Raw 10 – 100 kg	Tanzania,	data in Table 2 of document CoP16 Doc. 53.2.2 (Rev.1).
develop country specific	 Worked 10 – 100 kg 	China	
actions and deadlines	- Raw 100kg+		Trade chain perspective considered:
(CoP16 Com. II 22)]	- Worked 100 kg+		- Destinations of illicit trade (China & Thailand),
			- Transit countries and trade routes for large quantities of illicit ivory (Hong
Report to CoP16	Weight Index – relative weight of ivory in trade by ivory		Kong SAR of China, Malaysia, Philippines and Viet Nam),
submitted by TRAFFIC	type and in three weight classes (<10kg, 10 – 100 kg and		- source and exit points for large amounts of ivory leaving Africa (Kenya,
but amendment to	100kg+)		Tanzania and South Africa)
Annex 1 to Res Conf.			
10.10 adopted – The	Cluster analysis: Clusters on the far right-hand side of the		All four of these groups have been far more active in the illicit ivory trade over
CITES Secretariat to	dendrogram, have the greatest degree of separation		the last three years and are prominently involved or implicated in large-scale
report on ETIS to CoP (see CoP16 Com. II. 26)	from all other clusters in the analysis (priorities of greatest		transactions of ivory that represent higher-level criminal activity.
(See COP 16 Com. II. 26)	concern).		In some cases, government issues sould be an inhibiting factor lying behind
			In some cases, governance issues could be an inhibiting factor lying behind seizure and reporting rates for these countries and territories.
			seizure and reporting rates for these countries and territories.
			Finally, these groups contain some of the largest ivory markets in the world at
			that point in time.
			1.0.1 FORM 1.1.1 1.1.1.0
			Issues highlighted:
			- Large consignments
			- Law enforcement at retail markets rare (consumer countries)
			- Requirements of Res Conf. 10.10 (Rev.CoP15) for internal ivory trade
			in ivory are not fully implemented
			- Market surveys – no of carvers / persons active in markets (consumer
			countries)
			- Compliance with regulatory provisions
			- Reporting to ETIS

СоР	Notes re: analysis	Country / -ies	Justification
	•	-	Transit points for large-scale movements of ivory
			- Ivory stock management
		Second tier level of concern:	
		Nigeria,	Measure of scale (mean weight): 1088 – 2042 kg
		Ethiopia,	Percentage of weight in recent period: 15 & 59
		Egypt,	Percentage of large-scale ivory seizure to mean weight. 0.24
		Gabon,	Mean market score: 4.5 – 6.4
		Congo,	Mily of course control \$460 and out countries and towitories for illigit
		Uganda,	Mix of source, entrepôt/transit and exit countries and territories for illicit consignments of ivory from Africa or, in the case of Taiwan Province of China, a
		Mozambique, Democratic Republic of Congo,	potential transit point for ivory moving through Asia.
		Taiwan province of China,	
		Cameroon	Egypt, the Democratic Republic of Congo, Mozambique and Nigeria all have
		Cameroon	important domestic ivory markets in their major cities that remain unregulated.
			These countries and territories typically exhibit poor values for law enforcement
			effort and are occasionally involved in large-scale movements of ivory,
			especially Nigeria, Mozambique, Uganda and Cameroon, which indicates the involvement of organised crime syndicates.
			Issues highlighted:
			- Sources of illicit ivory
			- Unregulated domestic markets
			- Transit / Transport hub
			- Large scale movements
		Emerging concerns -	-
		important to watch:	Measure of scale (mean weight): 709 kg
		Angola,	Percentage of weight in recent period: 60
		Laos	Percentage of large-scale ivory seizure to mean weight. 0.23
		Cambodia	Mean market score: 5.1
		Qatar	
		United Arab Emirates	Key export or transit countries for large consignments of illicit ivory
		Japan	(Japan – as ivory importing country)
CoP17	Assignment of country of origin to ivory seizures following	Countries of primary	
<u>CoP17 Doc 57.6</u>	DNA assessment: records modified for the period 2005 –	concern:	Greatest quantity of illegal ivory in trade according to seizure data in ETIS
(Rev. 1)	2014 to reflect outcomes of DNA assessments	China,	· · · · · · · · · · · · · · · · · · ·
		Hong Kong SAR of China,	Measure of scale (Mean weight): 3,220 – 41,257 kg
	Note on methods:	Kenya,	Percentage of weight in recent period: No longer included in table
	Period: 2007 – 2014	Malawi,	Proportion (no longer percentage) of large-scale ivory seizure to mean weight.
	Weight classes: medium (10 – 100kg) and large	Malaysia,	0.56 – 0.95
	(>100kg) weight classes combined	Singapore,	Mean market score: -1.5 to 7.0(KE and TZ -1.5)
	Selection of countries: Scoring system based on	Tanzania,	
	weight classes used to assess each country	Togo,	Countries have been highly implicated in illicit ivory trade movements over the
		Uganda,	last three years.

СоР	Notes re: analysis	Country / -ies	Justification
	(countries need to score at least 100 points over eight years of data to be considered in the analysis) • Bias adjustment of ETIS seizure data: Bias arises owing to differences in the ability of countries, firstly, to make seizures and, secondly, to report the seizures they do make to ETIS. Bias correction makes it possible to produce relative estimates of seizure and reporting rates for each country in each year which allows for meaningful comparisons to be made between countries over time. TRAFFIC identified the following proxy variables to account for differences in seizure and reporting rates over time: • law enforcement effort (LE) ratio – proxy for law enforcement effort	Viet Nam	Part of the trade chains in 94% of the large-scale ivory seizures reportedly made that represent higher-level criminal activity since 2009. Six of these countries, plus Hong Kong SAR of China, were previously identified as first-tier priorities in the analysis to CoP16 and are already part of the NIAP process which is unfolding under the direction of the CITES Standing Committee. On the basis of the analysis, Malawi, Singapore and Togo emerged as countries which the Parties could consider for inclusion in the CITES oversight process to address illegal trade in ivory.
	 a single covariate was used to determine the seizure rate a combination of the CITES Annual Reporting Score and the Data Collection Effort Score, which is accorded to each individual seizure record to describe the process under which it was collected (i.e. targeted, prompted or passive) – proxy for reporting These bias adjusting factors were applied to the data to obtain relative indicators of numbers and weights of illegal ivory transactions by ivory type and weight class. 	South Africa,	Measure of scale (Mean weight): 180 - 3,220 kg Percentage of weight in recent period: No longer included in table Proportion (no longer percentage) of large-scale ivory seizure to mean weight: 0.51 - 0.83 Mean market score: 4.8 - 5.4 Countries repeatedly play important supporting roles in the illicit ivory trade, especially large movements of ivory. Five of these countries were previously assigned this category of prioritisation at CoP16. Thailand and Cambodia already have developed NIAPs and are engaged in implementation.
		Countries important to watch: Angola, Democratic Republic of Congo, Egypt, Japan, Lao PDR, Mozambique, Philippines,	Other countries which fall in residual cluster groups that may not adequately highlight the salient attributes of their involvement in ivory trade, several countries are noted as 'countries important to watch'. This is done in order to raise attention and track existing and emerging developments which could potentially become problematic in terms of sources, trade routes or markets in future iterations of the ETIS analysis. Measure of scale (Mean weight): 601 – 2,960 kg
CoD19		Qatar United Arab Emirates	Percentage of weight in recent period. No longer included in table Proportion (no longer percentage) of large-scale ivory seizure to mean weight. 0.90 – 0.98 (some clusters 0.00) Mean market score: 3.0 – 6.3 All of these countries were previously prioritized in the CoP16 analysis.
CoP18		Category A:	Measure of scale (Mean weight): 16,849 – 32, 054 kg Percentage of weight in recent period: No longer included in table

СоР	Notes re: analysis	Country / -ies	Justification
CoP18 Doc. 69.3 (Rev. 1)	Troite for analysis	Malaysia, Mozambique, Nigeria and Viet Nam Category B: Kenya, United Republic of Tanzania, Uganda, China and Hong Kong SAR of China	Proportion (no longer percentage) of large-scale ivory seizure to mean weight. 0.69 – 0.75 Mean market score: 4.67 – 6.00 Collectively account for over half (51%) of the seized and reported estimated ivory weight in this time period, of which nearly three-quarters represents large-scale seizure events that point to higher-level criminal activity Measure of scale (Mean weight): 11,836 – 13,919 kg Percentage of weight in recent period: No longer included in table Proportion (no longer percentage) of large-scale ivory seizure to mean weight: 0.57 – 0.59 Mean market score: 1.33 – 6.50 Account for another 27% of the estimated ivory weight between 2015-2017, with 58% representing transactions involving large-scale movements of ivory that are
		Category C: Democratic Republic of Congo, Congo, South Africa, Cameroon, Gabon, Zimbabwe Angola, United Arab Emirates, Ethiopia, Cambodia,	believed to be put together by organised criminal syndicates. Whilst the scale of involvement in illegal ivory trade is significant, these groups exhibit the highest LE Ratio values Measure of scale (Mean weight): 2,490 – 3,589 kg Percentage of weight in recent period: No longer included in table Proportion (no longer percentage) of large-scale ivory seizure to mean weight: 0.00 – 0.45 Mean market score: 3.43 – 4.17
		Singapore, Lao People's Democratic Republic, Turkey	 Countries in Africa continue to be major sources of ivory in a subregion where elephant populations have experienced major declines, but still exhibits the highest percentage of illegally killed elephants (PIKE) values for 2017, indicating a very serious poaching threat still remains. Although their identification as countries of origin in many illegal ivory transactions is often lost in terms of the known trade route information, all of these countries have relatively high weight values in the period 2015-2017.
			Countries in Asia three countries have relatively high weight values when ivory trade flows are considered using trade chain information irrespective of where seizures actually occurred some countries primarily function as end-use destinations with growing domestic ivory markets, but also sometimes play the role of transit countries for ivory moving to other locations
CoP19 Doc. 66.6		Category A Nigeria,	Category A and B selection of these countries was based on: - higher overall illegal trade activity within country,

СоР	Notes re: analysis	Country / -ies	Justification	
		Democratic Republic of the Congo, Viet Nam	 higher large-scale illegal trade activities that occurred in the country undetected – i.e., large seizures in which the country was implicated as country of origin, export/re-export, or transit, or destination in the illegal trade chain. 	
			Differentiation to determine ranking of the Parties in those clusters as Category A or B was done in the context of the overall bias-adjusted illegal trade volume (or weight seized), and the reported role, of the country in the illegal trade chain.	
			Large-scale seizures in which the illegal trade chain implicated the country	
		Category B Gabon, Malaysia, China, Mozambique, Cambodia	Countries with more small-scale seizures made in country	
		Category C South Sudan	Data for one seizure-in was obtained from open sources, and the country was also implicated by another Party submitting seizure data to ETIS (notable seizure – 3.2 tonnes of raw ivory).	
			Lowest CPI score indicating high corruption in the country	
			Estimated low LE ratio of 0.33	

SIMPLIFIED SUMMARY - COUNTRIES PER CATEGORY

Priority ranking	ETIS REPORT TO COP16 ¹⁵	ETIS REPORT TO COP17 ¹⁶	ETIS REPORT TO COP18	ETIS REPORT TO COP19
'primary concern' / Cat A -	Malaysia, the Philippines, South	China, Hong Kong SAR, Kenya, Malawi , Malaysia, Singapore, Tanzania, Togo , Uganda, Viet Nam		Nigeria, Democratic Republic of the Congo, Viet Nam,

Parties highlighted in blue were requested to develop NIAPs at SC63 (<u>SC63 SR</u>) and Parties highlighted in green were requested to develop NIAPs in paragraph b) of Decision 16.79 (<u>Decisions adopted at CoP16</u>)

Parties in bold were requested to develop NIAPs by the Standing Committee through a postal procedure after CoP17 (Notification to the Parties No. 2017/042)

Countries of 'secondary concern' / Cat B - Parties markedly affected by illegal trade in ivory	Republic of the Congo, Egypt,	Ethiopia, Gabon, Nigeria, Sri	. •	Gabon, Malaysia, China, Mozambique, and Cambodia
Countries 'important to watch' / Cat C - Parties affected by illegal trade in ivory	PDR, Qatar, United Arab Emirates		Democratic Republic of Congo, Congo, South Africa, Cameroon, Gabon, Zimbabwe Angola, United Arab Emirates, Ethiopia, Cambodia, Singapore, Lao People's Democratic Republic, Turkey	South Sudan