

National Ivory Action Plan (NIAP) Process

Parties that 'achieved' their NIAPs

Egypt

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Egypt's assessment ¹ (SC70)	44% (11 of 25 actions)	40% (10 of 25 actions)	0% (0 of 25 actions)	12% (3 of 25 actions)	4% (1 of 25 actions)	0% (0 of 25 actions)
Secretariat's assessment (SC70)	44% (11 of 25 actions)	32% (8 of 25 actions)-	8% (2 of 25 actions)	12% (3 of 25 actions)	0% (0 of 25 actions)	4% (1 of 25 actions)
Egypt's assessment (SC71)	84% (21 of 25 actions)	16% (4 of 25 actions)	0% (0 of 25 actions)	0% (0 of 25 actions)	0% (0 of 25 actions)	0% (0 of 25 actions)
Secretariat's assessment (SC71)	80% (20 of 25 actions)	12% (1 of 25 actions)	4% (1 of 25 actions)	4% (1 of 25 actions)	0% (0 of 25 actions)	8% (2 of 25 actions)

1. The Standing Committee at SC70 agreed recommendation f) directed to Egypt, as presented in document [SC70 SR](#). Recommendation f) *inter alia* requested the Party to submit a revised and updated NIAP to the Secretariat for assessment in accordance with Step 3 of the *Guidelines*. Egypt did not submit a revised and updated NIAP to the Secretariat but instead submitted a report on progress with NIAP implementation. The Party reports that, in accordance with Step 5 paragraph a) of the *Guidelines*, it has assessed more than 80% of its NIAP actions as 'substantially achieved' and all remaining actions as 'on track', and therefore requests to exit the NIAP process.
2. The [NIAP of Egypt](#) was submitted to the Secretariat on 12 January 2015 and includes 25 priority actions. Egypt's self-assessment for SC71 evaluates 21 actions as 'achieved' and four actions as 'substantially achieved'. Egypt's progress report to the present meeting is available as Annex 5 to document SC71 Doc. 11.
3. The Secretariat notes that Egypt's progress report contains substantially more information than the Party's previous reports on progress with NIAP implementation, and this enabled the Secretariat to better assess progress. The report includes information on a variety of measures implemented and activities conducted to address illegal trade in ivory as it relates to Egypt. The Party reports good collaboration between different national agencies in the fight against wildlife crime, and it is worth noting that Egypt reports that as part of its capacity-building measures it has delivered trainings regarding illegal trade in wildlife to a large number of prosecutors, police officers, and customs officers in the period between August 2010 to September 2016. In addition, it is reported that customs, police, military and security staff based at border areas were targeted through nine awareness raising workshops. Egypt further reports that it has established a hotline for the public to report illegal trade in ivory and other wildlife crimes. The Party states that it applies strict security measures at its borders with Sudan and Libya, and that while seizures are

¹ The Secretariat noted a number of discrepancies between the ratings of actions against pillar C of Egypt's NIAP, in parts B (summary evaluation of actions) and C (detailed evaluation of actions) of the progress report to SC70. The Secretariat used the ratings given in part C of the report for its assessment.

made along these borders, ivory is not detected and it does not appear that ivory trafficking occurs across them.

4. The Secretariat notes that Egypt reports regarding action C.4 that discussions about the development of a sampling protocol for large-scale seizures of ivory are ongoing and that the development of a framework procedure for such cases is still in the early stage. The Secretariat therefore believes that a rating of 'on track' would be more appropriate for this action.
5. Regarding actions A.3, D.3, and E.3, Egypt notes that the implementation of these actions has been affected by the political instability in the region in the wake the Arab Spring revolutions. Egypt further explains that the political developments, particularly in neighboring Libya and Sudan, made communication and discussion regarding a potential harmonization of wildlife legislation (action A.3), the establishment of a regional framework for collaboration on wildlife crime (action D.3) and the strengthening of regional cooperation and exchange of information (action E.3) difficult or impossible to implement. The Secretariat notes that Egypt rated actions A.3, D.3, and E.3 as 'substantially achieved' or 'achieved', and it is of the opinion that the actions would be more appropriately rated as 'not commenced' or having achieved 'partial progress'. However, given the exceptional circumstances explained by Egypt, the Secretariat would propose not to include these actions in the assessment of Egypt's progress with NIAP implementation. In this case, the Secretariat's assessment would consider only 22 actions, of which 20 would be rated as 'achieved' (90%), one as 'substantially achieved' (5%) and one as 'on track' (5%).
6. The ETIS report prepared for CoP16 identified Egypt as a Category B Party, whilst the ETIS report prepared for CoP17 identified Egypt as a Category C Party. The ETIS report prepared for CoP18 no longer identifies Egypt as a priority Party. The Secretariat consulted with TRAFFIC as the manager of ETIS requesting information on the latest data on Egypt available to ETIS. TRAFFIC indicated that in the period 2015 to 2017, authorities in Egypt made 12 seizures involving 499 kg of ivory prior to export. In the same period, nine seizures involving 12 kg of ivory were made by other countries where Egypt is identified as part of the illegal trade chain. Overall, this indicates that good law enforcement action is being taken by Egypt, a fact that is also reflected in the high Law Enforcement ratio for the group in which Egypt is placed in the ETIS report prepared for CoP18.
7. As pointed out in paragraph 1 above, a minimum of 80% of actions in the NIAP of Egypt are now assessed as 'substantially achieved', and the remaining actions as 'on track' for achievement. The report provided by Egypt provides sufficient details on the implemented activities to justify the allocated progress ratings, and the Secretariat recommends that the Committee in line with Step 4, paragraph e), of the *Guidelines*, consider an overall rating of 'achieved' for Egypt, 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'.
8. Egypt is no longer identified as a priority Party in the ETIS report to CoP18, and the Secretariat considers that further activities can be pursued by Egypt outside the NIAP process.
9. The Secretariat recommends that Egypt exit the NIAP process in accordance with the provisions of Step 5, paragraph d), of the *Guidelines*, and that illegal trade in ivory as it relates to Egypt continue to be monitored in accordance with Resolution Conf. 10.10 (Rev. CoP17).

Malawi

% OF NIAP ACTIONS IN EACH CATEGORY						
	Achieved	Substantially achieved	On track	Partial progress	Pending completion of another action	Not commenced
Malawi's assessment (SC70)	58% (7 of 12 actions)	17% (2 of 12 actions)	17% (2 of 12 actions)	0% (0 of 12 actions)	8% (1 of 12 actions)	0% (0 of 12 actions)
Secretariat's assessment (SC70)	42% (5 of 12 actions)	25% (3 of 12 actions)	25% (3 of 12 actions)	8% (1 of 12 actions)	0% (0 of 12 actions)	0% (0 of 12 actions)

Malawi's assessment (SC71)	83% (10 of 12 actions)	8.5% (1 of 12 actions)	8.5% (1 of 12 actions)	0% (0 of 12 actions)	0% (0 of 12 actions)	0% (0 of 12 actions)
Secretariat's assessment (SC71)	83% (10 of 12 actions)	0% (0 of 12 actions)	17% (2 of 12 actions)	0% (0 of 12 actions)	0% (0 of 12 actions)	0% (0 of 12 actions)

10. At SC70, the Standing Committee agreed recommendation h) as presented in document [SC70 SR](#), concerning Malawi. The Committee welcomed the progress made by Malawi in implementing its NIAP, and agreed an overall rating of 'partial progress'. Although the next report on progress with NIAP implementation from Malawi was only due at SC73, the Party chose to submit a report to the present meeting.
11. The [NIAP of Malawi](#) contains 12 priority actions, and in its report prepared for the present meeting Malawi's self-assessment evaluates ten actions as 'achieved', one as 'substantially achieved', and one as 'on track'. In accordance with Step 5, paragraph a), of the *Guidelines*, the Party reports that it has assessed more than 80% of its NIAP actions as 'substantially achieved' and all remaining actions as 'on track', and therefore requests to exit the NIAP process.
12. The report received from Malawi is available as Annex 8 to document SC71 Doc. 11. It outlines a variety of measures and activities implemented to address illegal trade in wildlife, in particular illegal trade in ivory. It is worth noting that Malawi reports that the efforts of its specialized Wildlife Crime Investigations and Intelligence Unit (WCIIU), which is jointly staffed by wildlife and police investigators, have since its formation in 2016 resulted in the seizure of more than 1.4 tonnes of ivory and more than 300 arrests. The Party further reports that it now has a 95% prosecution and conviction rate for wildlife crime and a custodial sentence rate of above 90%. It is reported that a sentencing guidelines and legislation handbook has also been produced and is in use, and that approximately 90% of magistrates countrywide have been trained. Malawi also reports that in 2018 there were no seizures of wildlife contraband outside of the country, which had originated from or transited through Malawi.
13. Upon review of Malawi's progress report to the present meeting, the Secretariat believes that the report provides sufficient details on the implemented activities to justify the progress ratings allocated, with the exception of action 3.1. The Secretariat notes that milestone M2 for action 3.1 is not yet achieved and implementation of a joint cross border intelligence-led operation with the United Republic of Tanzania and Mozambique is yet to be initiated. In light of this, a rating of 'on track' for this action might be more appropriate.
14. The Secretariat notes that while the ETIS report to CoP17 identified Malawi as a Category A Party, the ETIS report to CoP18 no longer identifies Malawi as a priority Party. The Secretariat consulted with TRAFFIC as the manager of ETIS requesting information on the latest data on Malawi available to ETIS. TRAFFIC indicated that since the inclusion of Malawi in the NIAP process following SC69, the Party has demonstrated a more than 10-fold improvement in the making and reporting of ivory seizures to ETIS. TRAFFIC indicated that authorities in Malawi prior to export from the country made 79 seizures involving 1,077 kg of ivory in the period from 2015 to 2017, while in the same period four seizures involving 441 kg of ivory were made by other Parties where Malawi is identified as part of the illegal trade chain. TRAFFIC pointed out that two-thirds of the seizures made by Malawi were reportedly detected owing to intelligence-driven activities and investigative work, and that in conjunction with these cases, at least 136 individuals were arrested, including four Chinese and two South Korean nationals, that were convicted and sentenced to up to 14 years in prison. Overall, this indicates that good law enforcement action is being taken in Malawi, and that efforts have been significantly scaled up. Good law enforcement effort is also reflected by the high Law Enforcement ratio for the group in which Malawi is placed in the ETIS report prepared for CoP18.
15. The extensive measures and activities undertaken by Malawi to implement its NIAP are commendable. As pointed out in paragraph 11 above, a minimum of 80% of actions in the NIAP of Malawi are now assessed as 'substantially achieved', and the remaining actions as 'on track' for achievement. In light of this, the Committee may wish to in line with Step 4, paragraph e), of the *Guidelines*, consider an overall rating of 'achieved' for Malawi, 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'.

16. Malawi implemented comprehensive measures and activities to combat illegal trade in ivory and is no longer identified as a priority Party in the ETIS report prepared for CoP18. The Secretariat believes that further activities by Malawi to address illegal ivory trade, can be pursued outside the NIAP process.
17. The Secretariat recommends that Malawi exit the NIAP process in accordance with the provisions of Step 5, paragraph d), of the *Guidelines*, and that illegal trade in ivory as it relates to Malawi continue to be monitored in accordance with Resolution Conf. 10.10 (Rev. CoP17).

Mozambique

18. Mozambique 'achieved' its National Ivory and Rhinoceros Action Plan (NIRAP) in accordance with Step 4, paragraph e), of the *Guidelines to the NIAP process*, and the Standing Committee at SC70 agreed recommendations p) and q) directed to Mozambique, as presented in document [SC70 SR](#). The Committee commended Mozambique for achieving its NIRAP, but considered that it was premature for Mozambique to exit the NIAP process at the time. The Committee agreed to consider at SC73 whether Mozambique should revise and update its NIRAP, exit the NIAP process, or if any other measures need to be taken, in accordance with Step 5, paragraph d) of the *Guidelines*. The Committee requested Mozambique to at SC73 report on any further measures and activities it has implemented to address poaching and illegal trade in ivory and rhinoceros horn as it affects Mozambique, with a particular focus on the measures and activities specified in recommendation p) iii) A to C, agreed by the Committee at SC70. The Committee also requested the Secretariat to continue to monitor progress in accordance with paragraph 9 of Resolution Conf. 10.10 (Rev. CoP17), and to bring any issues of concern that may arise to the attention of the Committee.
19. In this context the Secretariat notes that Mozambique has made the most significant shift amongst all Parties identified by the ETIS report prepared for CoP18.² The ETIS report prepared for CoP17 identified Mozambique as a Category C Party. In the ETIS report prepared for CoP18, Mozambique has moved to the category of highest prominence, and it is now identified as a Category A Party.
20. The ETIS report to CoP18 groups Mozambique together with Malaysia and Nigeria and states that these Parties collectively exhibit the fifth highest mean number of seizures made in the time period under analysis and also have the second largest weight value, indicating that frequency and scale in the illegal ivory trade are important factors. The report states that nearly 60% of the total weight of ivory seized related to seizures of 500 kg or more, suggesting that the bulk of the illicit ivory traffic moving through and from these three Parties represents higher-level organised criminal activity. The report notes that in terms of making seizures, the Law Enforcement Ratio (21%) of the three Parties is the fourth poorest in the ETIS cluster analysis and that this indicates that only one in five seizures in which these Parties are part of the trade chain is being made by one of them. The report further notes that the Corruption Perception Index (CPI) value for governance is the fourth lowest for these Parties and it states that this means that corruption could potentially be a serious issue inhibiting performance against illegal ivory trade.
21. The ETIS report to CoP18 further highlights that the estimated weight value for illegal ivory trade coming from Mozambique and Nigeria has increased by some 40% in the period 2015-2017, compared to the previous three years. The report states that partially in response to Kenya, the United Republic of Tanzania and Uganda collectively moving to strengthen law enforcement within their borders, there is evidence that transnational criminal syndicates previously operating in those countries have shifted their operations to Mozambique and Nigeria. It is stated that Mozambique has seen much of its elephant population severely impacted by poaching for illegal ivory trade, and that although the presence of ivory in Mozambique's physical markets has contracted, ready under-the-counter availability continues if specifically requested. The report also notes that since CoP17, ivory theft from official government stockpiles has occurred in Mozambique, at a scale that is of serious nature, and that the stolen ivory was subsequently seized in a large-scale seizure in Cambodia.
22. In addition to the ETIS report to CoP18, open source information suggests that since SC70 Mozambique was significantly affected by illegal trade in ivory and rhinoceros horn. This is exemplified by the seizure of 3.2 tonnes of raw ivory originating from Mozambique, made by authorities in Cambodia in December

² <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-069-03-R1.pdf>

2018,³ and the seizure of 34 kg of rhinoceros horn from Mozambique, made by authorities in Turkey in the same month.⁴

23. Mozambique's movement to the highest category of prominence in the ETIS analysis prepared for CoP18, and the additional available information on recent trends as highlighted, demonstrate that there is an urgent need for further action and stepped up efforts in Mozambique. Against this background, the Secretariat considers that it would be appropriate for the Standing Committee to consider the participation of Mozambique in the NIAP process at the present meeting, rather than postponing this decision to SC73.
24. In light of the findings of the ETIS report to CoP18 and other available information, the Secretariat recommends that the Standing Committee request Mozambique to revise and update its NIRAP in accordance with Step 2 of the *Guidelines*, to commence implementation as soon as it is assessed as 'adequate', and provide associated reporting.

³ https://www.theguardian.com/environment/2018/dec/16/cambodia-seizes-record-three-tonne-haul-of-african-ivory?CMP=share_btn_fb

⁴ <https://www.dailysabah.com/turkey/2018/12/09/turkish-authorities-seize-22-million-worth-of-rhino-horns-at-ataturk-airport>