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NATIONAL IVORY ACTION PLAN PROCESS (SC79 Doc. 6.6)

EIA Recommendations to the 79th meeting of the
Standing Committee

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ABOUT EIA

The Environmental Investigation Agency (EIA) investigates and campaigns against environmental crime and abuse. Our undercover investigations expose transnational wildlife crime, with a focus on elephants, pangolins and tigers, and forest crimes such as illegal logging and deforestation for cash crops. We work to avert climate catastrophe by investigating the criminal trade in refrigerant gases, strengthening and enforcing regional and international agreements that tackle fossil fuels and climate super-pollutants, including ozone-depleting substances, hydrofluorocarbons and methane, and promoting sustainable cooling. We seek to safeguard global marine ecosystems by addressing the threats posed by plastic pollution, bycatch and commercial exploitation of whales, dolphins and porpoises.

EIA UK

62-63 Upper Street,
London N1 0NY UK
T: +44 (0) 20 7354 7960
E: ukinfo@eia-international.org
eia-international.org

EIA US

PO Box 53343
Washington DC 20009 USA
T: +1 202 483 6621
E: info@eia-global.org
eia.org

Environmental Investigation Agency UK

UK Charity Number: 1182208

Company Number: 07752350

Registered in England and Wales



INTRODUCTION

The National Ivory Action Plan (NIAP) process was developed in 2013 as an important tool and framework to protect elephants from the illegal ivory trade.

Countries in the NIAP process commit to implementing time-bound measures under five thematic pillars to increase national resilience against poaching and trafficking threats. These pillars are: *legislation and regulation, law enforcement collaboration, international cooperation, public awareness and education and reporting.*

The NIAP process is currently subject to a review (see CoP20 Doc 35.2). EIA welcomes the Secretariat's proposed amendments to all five steps of the NIAP Guidelines contained in Annex 1 of CoP20 Doc. 35.2. EIA also supports the recommendation for further consideration of the Review's findings by CoP21.

There are currently 11 Parties included in the NIAP process as follows:

- **Category A (most affected by the illegal trade in ivory):** Democratic Republic of the Congo (DR Congo), Nigeria, Togo and Vietnam
- **Category B (markedly affected by the illegal trade in ivory):** Gabon and Mozambique
- **Category C (affected by the illegal trade in ivory):** Angola, Congo, Cameroon, Lao PDR and Qatar

The Elephant Trade Information System (ETIS) is the foundation upon which Parties are identified for inclusion in the NIAP process.¹

In the ETIS report to CoP20, China and the United Arab Emirates (UAE), which are not currently in the NIAP process, are flagged as Category C (*affected by illegal trade*), providing a basis for their potential inclusion in the NIAP process.

The ETIS report to CoP20 also flags that, due to ongoing involvement in illegal ivory trade, Angola, currently classified as Category C, should be escalated to Category B (*markedly affected by illegal trade*), while Mozambique, currently Category B, should be escalated to Category A (*most affected by illegal trade*).

EIA generally supports the Secretariat's recommendations in SC79 Doc. 6.6 relating to China and the UAE, which takes into account the findings of the ETIS report to CoP20. However, EIA notes the Secretariat's report to SC79 does not include recommendations relating to Angola or Mozambique, despite the ETIS report to CoP20 flagging reasons for an escalation in their categorisation.



EIA ENCOURAGES THE STANDING COMMITTEE TO:

- 1. SUPPORT INCLUSION OF THE UAE** as Category C in the NIAP process and request that the UAE develop a National Ivory and Rhino Action Plan (NIRAP)
- 2. CLOSELY MONITOR CHINA'S ONGOING ROLE** as one of the world's largest illegal markets for ivory and other wildlife products and consider inclusion in the NIAP process at the next regular meeting of the Standing Committee
- 3. CALL FOR A CHANGE IN ANGOLA'S CATEGORISATION**, from Category C to Category B, and call for Angola to develop a NIRAP
- 4. CALL FOR A CHANGE IN MOZAMBIQUE'S CATEGORISATION**, from Category B to Category A, and continue to report on the implementation of its NIRAP.

EIA's rationale for these recommendations can be found below.

CHINA

EIA SUPPORTS THE SECRETARIAT'S RECOMMENDATION *NOT* TO INCLUDE CHINA AS A CATEGORY C PARTY IN THE NIAP PROCESS.

EIA SUPPORTS THE SECRETARIAT'S RECOMMENDATION CALLING FOR CHINA TO REMAIN VIGILANT AND TO CLOSELY MONITOR IVORY TRAFFICKING TRENDS.



- At SC70 in October 2018, China exited the NIAP process along with Kenya, the Philippines, Thailand, Tanzania and Uganda in accordance with Step 5 of the Guidelines.² Since then, China has made notable progress in terms of both legislation and enforcement in tackling the ivory trade. However, China continues to be one of the largest markets for illicit ivory, with Vietnam as a key conduit for illicit ivory entering China.³
- According to EIA's Global Environmental Crime Tracker, between October 2018 and July 2025, China has been implicated in more than 23 tonnes of ivory seized globally in more than 1,086 reported incidents. This includes more than 10 tonnes of ivory seized in China and 13 tonnes of ivory seized elsewhere but linked to China.⁴
- Despite the introduction of the domestic ivory ban on 31 December 2017, research has found that consumption by Chinese 'die-hard' ivory buyers has remained relatively unchanged, with consumers continuing to purchase ivory in China and when travelling abroad.⁵ Top countries and regions from where Chinese customers buy ivory have been Hong Kong, Japan, Thailand, Cambodia, Laos and Vietnam.⁶
- In the ETIS report to CoP20, between 2021-23, China accounted for 1,548 out of 2,735 (56 per cent) worked ivory seizures worldwide.⁷ The report notes 29 per cent of all seizures made in China during this period were transported by post. 63 per cent of records highlighted the use of air transportation, which the ETIS report suggests is a result of tourism. EIA's database suggests that this trend continues with at least 74 seizures of worked ivory made in China between 2024 and July 2025, of which the majority was transported by air passengers or by post.⁸
- China is one of the primary markets for ivory illegally exported from Japan, the world's largest remaining legal market for ivory.⁹ According to EIA's database, between November 2018 and July 2024, at least 76 seizures of ivory were made in China, arriving from Japan.¹⁰ The network analysis presented in Annex 2C of the ETIS report to CoP20 further indicates that Japan accounted for an estimated 10 per cent of worked ivory seizures made in China from 2006-23.¹¹
- According to Angola's NIAP progress report to SC78, between 2018-24, more than two tonnes of ivory and other specimens were seized in the country, of which the majority was linked to Chinese and Vietnamese nationals.¹²
- EIA's intelligence in 2024 also suggests that Chinese traders continue to source both raw and worked ivory in Nigeria for export to China, with worked ivory being transported via air routes, transiting through Laos or Malaysia.
- EIA's intelligence in 2024 suggests that despite a recent decline in demand for ivory in China due to increased transportation costs and stricter law enforcement, ivory continues to be purchased, concealed and smuggled from Vietnam into China across various land borders to meet ongoing demand.¹³



THE UAE

EIA SUPPORTS THE SECRETARIAT'S RECOMMENDATION TO INCLUDE THE UAE AS A CATEGORY C PARTY IN THE NIAP PROCESS.

EIA SUPPORTS THE SECRETARIAT'S RECOMMENDATION THAT THE UAE DEVELOP A *NATIONAL IVORY AND RHINO ACTION PLAN (NIRAP)*.

- According to EIA's database, between 2022-24, the UAE was recorded as the third top country implicated in global ivory seizures by weight, following Mozambique and Vietnam.¹⁴ More than nine tonnes of ivory was confiscated in more than five incidents linked to the UAE during this period, including 4.8 tonnes seized in Mozambique in March 2024¹⁵ and 4.2 tonnes seized in Malaysia in July 2022¹⁶ via sea routes. Previously, Angola had primarily been implicated in ivory smuggling to Asia via air, suggesting the sea route may be an emerging strategy.
- Between 2022-24, the UAE was exploited as a transit country in at least four incidents involving approximately 129kg of ivory from Angola to Vietnam. This is concerning as the Angola-Vietnam corridor has been well documented for both ivory and rhino horn trafficking over the past three years.
- Between 2022 and March 2025, the UAE has been implicated in seizures of more than 150kg of rhino horns in Vietnam, Angola, Malaysia and South Africa. The UAE, along with Vietnam, South Africa and Malaysia, are documented among the countries most affected by rhino horn trafficking.¹⁷ Indeed, according to the report on rhinoceroses prepared by the IUCN African and Asian Rhino Specialist Groups and TRAFFIC for CoP20, the UAE moved from the Party sixth most affected by rhino horn trafficking at CoP19 (during the period 2018-20) to the fifth most affected (during the period 2021-23).¹⁸



ANGOLA

EIA RECOMMENDS THAT THE STANDING COMMITTEE CHANGE ANGOLA'S CATEGORISATION FROM CATEGORY C TO CATEGORY B AND RECOMMENDS THAT ANGOLA BE REQUESTED TO DEVELOP A *NATIONAL IVORY AND RHINO ACTION PLAN (NIRAP)*

- Between 2022-24, according to EIA's database, Angola has been implicated in more than eight tonnes of ivory seized globally. This includes the interception of 7.5 tonnes of raw ivory in Vietnam in 2023, the world's largest ivory shipment since 2019.¹⁹
- In addition to raw ivory, 385kg of worked ivory were seized in Angola destined for Vietnam in 2021²⁰ indicating the availability of ivory carving facilities in the region. This trend continues as in March 2025 a reported 1,200 pieces of worked ivory were seized in Luanda involving two Vietnamese nationals.²¹
- The Angola-Vietnam route has been exploited by traffickers to smuggle both ivory and rhino from Africa to Asia. According to Vietnam's NIRAP progress report to SC78, between 2022-23, Angola was linked to nine seizures of ivory and rhino horn made at Vietnamese airports and seaports. Angola's NIAP progress report to SC78 also highlighted the operations of Vietnamese nationals in the country in relation to illegal ivory trade via air routes.²²
- Angola has no wild rhinos and yet since 2020, according to EIA's database, the country has been linked to at least 22 seizures accounting for more than 267kg of rhino horns with the majority (13 cases) destined for Vietnam. It is understood that rhino horn is smuggled into Angola from Namibia, which has experienced a sustained and significant increase in rhino poaching since 2022.^{23,24,25} Angolan nationals have been arrested in Namibia in connection with rhino poaching on several occasions during the past five years.²⁶ The Standing Committee should consider requesting that Angola expand its NIAP into a NIRAP, which would outline targeted actions for Angola to address its role in both ivory and rhino horn trafficking. There is precedence for NIAPs evolving into NIRAPs in cases of persistent ivory and rhino horn trade (see for example Vietnam and Mozambique NIRAPs).
- At SC78, although Angola met the minimum threshold of 80 per cent implementation of its NIAP, the Standing Committee agreed that Angola should remain in the process due to its continued involvement in the illegal ivory trade and encouraged Angola to take additional measures to address the issue.²⁷ Furthermore, Angola and Vietnam were encouraged to enhance information exchange and conduct joint operations to combat the illegal trade in rhino horn affecting both countries.²⁸



MOZAMBIQUE

EIA RECOMMENDS THAT THE STANDING COMMITTEE CHANGE MOZAMBIQUE'S CATEGORISATION FROM CATEGORY B TO CATEGORY A AND ENCOURAGE MOZAMBIQUE TO CONTINUE REPORTING ON THE IMPLEMENTATION OF ITS NIRAP.

- Mozambique has been in the NIAP process since 2014. Since then, according to the Secretariat's assessment for SC78, only three out of 16 actions of its NIRAP have been "achieved" alongside seven actions as "substantially achieved", indicating slow progress.²⁹
- According to the ETIS report to CoP20, over the past few years Mozambique was involved in over 15.5 tonnes of ivory, including a large seizure of 994kg of ivory made in the country in 2022, destined for China.
- According to EIA's database, between 2022-24, Mozambique was recorded as the primary country implicated in global ivory seizures by weight. There have been four known large-scale smuggling cases of ivory totalling approximately 11 tonnes exported from Mozambique during this period, of which two (4.8 tonnes in 2024 and 4.2 tonnes in 2022) were bound for Asia by sea via the UAE.
- Between 2022-24, Mozambique has been implicated in at least 13 seizures totalling more than 180kg of rhino horns. The majority (six cases) were recorded in South Africa where Mozambican nationals were arrested for involvement in illegal rhino horn trade.
- Under NIRAP activities 3.1 and 3.2 and Decision 19.118, Mozambique has been requested to strengthen engagement and conduct joint operations with South Africa and Vietnam to tackle illegal rhino horn trade. However, it appears no tangible cooperation between Mozambique and these two countries has been reported, despite the adoption of bilateral agreements and the availability of multilateral frameworks. It is also worth noting that Mozambique failed to report on its implementation of Decision 19.118 to SC78.

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**environmental
investigation
agency**

EIA UK

62-63 Upper Street, London, N1 0NY, UK
eia-international.org
+44 (0)20 7354 7960