

# National Ivory Action Plan Process (Doc. 33.13.1)

## EIA recommendations to the 78th meeting of the CITES Standing Committee

February 2025



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# Introduction

The National Ivory Action Plan (NIAP) process, developed in 2013, is an important elephant conservation tool and framework. EIA commends the progress made so far by Parties participating in the NIAP process and the Secretariat for its efforts in the assessment. In particular, EIA congratulates the 13 Parties participating in the NIAP process for submitting progress reports to SC78 – this is the first time since SC65 that all NIAP Parties have reported.

At CoP19, Parties agreed a review of the NIAP process was necessary to ensure it remained effective and fit for purpose after a decade in use (Decisions 19.68- 19.70). The extensive findings of the Review are presented in SC78 Doc. 33.13.2. While EIA welcomes these findings, it is concerned that the Secretariat has only recommended minimal changes to the NIAP Guidelines outlined in Annex 3 of Resolution Conf. 10.10 (Rev. CoP19) (see EIA's [cross campaign briefing for SC78](#) for further analysis and proposed additional amendments to the Steps 3-5 of the NIAP Guidelines).

There are currently 13 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): Cambodia, Gabon, Malaysia and Mozambique
- Category C (affected by the illegal trade in ivory): Angola, Congo, Cameroon, Lao PDR (hereafter Laos) and Qatar.

While EIA generally supports the Secretariat's recommendations in SC78 Doc. 13.13.1, it is concerned that numerous gaps in implementation remain that warrant the focussed attention of the Standing Committee, in particular under Pillar 3 of the NIAP on *International and regional enforcement collaboration*.

Insufficient progress is being made by most NIAP Parties to collaborate with source, transit and destination countries to investigate, prosecute and deter ivory traffickers. This is a significant gap that undermines the long-term resilience of Parties to elephant poaching and ivory trafficking. Below, EIA provides an analysis of the progress made by seven NIAP Parties which have been in the process for a decade.

## **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendations for Cambodia and Malaysia to exit the NIAP process at SC78**
- **directs the Secretariat to continue monitoring illegal trade in ivory relating to Cambodia and Malaysia in accordance with Resolution Conf. 10.10 (Rev. CoP19) and bring any matter of concerns to the attention of the Standing Committee**
- **supports the Secretariat's recommendations to issue a written caution requesting Congo, Qatar and Togo to submit a progress report to the Secretariat in accordance with Step 4, paragraph f) of the Guidelines**
- **supports the Secretariat's recommendation that Angola continues to remain in the NIAP process and strengthen international cooperation with Vietnam to tackle illegal ivory trade and report to SC81**
- **rejects the Secretariat's recommendation that urges all Parties in the process to achieve their NIAPs by SC81. This is an arbitrary deadline and is unrealistic as some Parties achieved less than 50 per cent of their NIAP by SC78. Exit from the NIAP process should not become the primary goal of Parties in the process at the expense of making effective legislative and enforcement improvements to tackle ivory and other wildlife trafficking**
- **urges all Parties, particularly those in Categories A and B and Angola, to strengthen international law enforcement cooperation to tackle ivory and other wildlife trafficking pursuant to Resolution Conf. 11.3 (Rev. CoP19)**
- **considers appropriate measures at SC81, in accordance with Step 4 paragraph f) of the Guidelines and Resolution Conf. 11.3 (Rev. CoP19), if Category A and B Parties, especially those that have been in the process for a decade, fail to make adequate progress in the implementation of their NIAP.**

# Category A country assessments and recommendations

## Democratic Republic of the Congo (DR Congo)

When DR Congo was first included in the NIAP process in 2014, it was listed as a Category B Party. At CoP17, it moved to Category C. However, most recently at CoP19 in 2022, it was escalated to Category A – the highest level of prominence – due to significant levels of ivory trafficking within or originating from the country, marking the most concerning shift amongst all NIAP Parties.

DR Congo submitted a late report to SC77, after which the Secretariat conducted a technical mission to the country in light of changes to the DR Congo CITES Management Authority leadership and the lack of understanding regarding NIAP reporting requirements. As a result, DR Congo's progress report to SC78 shows major improvements.

ETIS data indicates that since 2020, more seizures of ivory, including large-scale volumes (>500kg), have been made in DR Congo, a possible sign of increased enforcement efforts in the country. However, an increase in seizures of large amounts of worked ivory may indicate the existence of ivory processing facilities for export out of the country.

Furthermore, although DR Congo's progress report provides some information regarding prosecutions of ivory traffickers from 2018-21, only one additional conviction is reported for 2021-24 (action 2.4). Consequently, EIA disagrees with the Secretariat's conclusion that action 5.3 is 'substantially achieved' as this determination appears to be based primarily on seizure data and not on prosecution data.

Illegal ivory trade networks cannot be dismantled through ivory seizures alone – post-seizure investigations, prosecutions and convictions are essential to disrupt and deter further trafficking. Additionally, as the Secretariat suggests, DR Congo should step up training events (action 2.1) not just for the ICCN, but also for judicial personnel, particularly the public prosecutor's office, underscoring potential gaps in the Party's long-term capacity to combat ivory trafficking.

Although DR Congo reports progress in strengthening cooperation with regional neighbours, there is no mention of its efforts to cooperate with transit or consumer countries in Asia, such as Vietnam, in order to disrupt transnational organised crime networks responsible for large-scale ivory shipments linked to DR Congo (for example the large-scale ivory seizure intercepted in 2019, the largest ever reported to ETIS.<sup>1</sup>)

EIA agrees with the Secretariat's assessment that DR Congo should prioritise enhancing its ivory stockpile management. Concerns regarding leakage of DR Congo's ivory stockpiles onto the illegal market, coupled with the increase in worked ivory seizures and ongoing raw ivory seizures, make the country extremely vulnerable to organised criminal activity. Furthermore, by the time of SC77, DR Congo had never submitted an ivory stockpile report and it remains unclear whether it submitted one between SC77 and SC78 as per Resolution Conf. 10.10 (Rev. CoP19) on *Trade in elephant specimens*.<sup>2</sup>

DR Congo's Corruption Perception Index (CPI) score remains high<sup>3</sup>, as does its Organized Crime Index score.<sup>4</sup> However, its NIAP does not include any anti-corruption measures, while SC78 Doc. 35.5 also notes a lack of a strategy combating corruption linked to wildlife crime in DRC.

### EIA recommends that the Standing Committee:

- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for DR Congo**
- **requests DR Congo to revise and update its NIAP with inclusion of anti-corruption measures pursuant to Resolution Conf. 17.6 (Rev. CoP19)**
- **requests DR Congo to report on its ivory stockpile to SC81 pursuant to paragraph 7 e) Resolution Conf. 10.10**
- **considers appropriate measures in accordance with Step 4 paragraph f) of the NIAP Guidelines and Resolution Conf. 14.3 (Rev.CoP19) if DR Congo fails to make progress by SC81, in particular on measures to strengthen ivory stockpile management and international cooperation.**

## Nigeria

Nigeria was first included in the NIAP process as a Category B Party in 2014 and escalated to Category A at CoP18 in 2017 due to the country's central role as a source and transit country of illegally traded ivory.

EIA supports the Secretariat's assessment that Nigeria has made "partial progress" in the implementation of its NIAP

activities and calls on Nigeria to step-up efforts to expedite progress, in particular strengthening legislation and regional and international cooperation.

In its NIAP progress report to SC78, Nigeria updated that the new Endangered Species Conservation and Protection Bill passed its second reading in the House of Representatives in May 2024 and highlighted that the Bill is now awaiting signature by the President. However, SC78 Doc. 33.9 (Application of Article XIII in Nigeria) emphasises that the Bill is awaiting its third reading at the House of Representatives (date unknown). The Standing Committee should therefore seek clarity regarding the process and status of the Bill and urge Nigeria to expedite its adoption and to ensure its implementation.

In terms of regional and international cooperation under Pillar C of its NIAP, only one action (C1) aims to strengthen transboundary frameworks with neighbouring countries including Benin, Chad, Cameroon and Niger. However, no information is provided regarding measures taken by Cameroon and Nigeria to operationalise the bilateral MoU signed in April 2024.

Furthermore, it is extremely concerning that international law enforcement cooperation with relevant Parties in Asia is not reflected in Nigeria's NIAP, given the country's significant role as an export country of African ivory and other illicit wildlife to Asia, particularly Vietnam since 2015.

During the past decade, at least 18 tonnes of ivory have been confiscated implicating both Nigeria and Vietnam, underscoring the ongoing existence of an illicit trade corridor. However, limited efforts have been made by Nigeria to exchange communication and law enforcement with Vietnam, Singapore and other relevant Asian countries in accordance CITES Resolution Conf. 11.3 (Rev. CoP18) on *Compliance and Enforcement*. Furthermore, the Memorandum of Understanding (MoU) on combating the illegal wildlife trade between Nigeria and Vietnam has been awaiting finalisation for more than two years.

In relation to action B11 on anti-corruption and anti-bribery measures, there are no updates on measures undertaken to tackle corruption facilitating wildlife crime in Nigeria in comparison to its progress report to SC77.

Given the continuous export of illegal ivory from Nigeria ports, Nigeria should be urged to implement anti-corruption measures at these exit points, which should include relevant agencies such as the Independent Corrupt Practices Commission (ICPC) and the Economic and Financial Crimes Commission (EFCC).

In 2023, Nigeria's performance in the CPI was still low (25/100),<sup>5</sup> raising serious concerns in securing criminal justice to tackle wildlife crime in the country.

#### **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for Nigeria**
- **urges Nigeria to adopt the new Endangered Species Conservation and Protection Bill and ensure its implementation**
- **urges Nigeria to expedite the implementation of the MoU with Cameroon to tackle regional ivory trafficking and report to SC81**
- **requests Nigeria to update and revise its NIAP with inclusion of international law enforcement cooperation with Vietnam, Singapore and relevant Asian countries to tackle ivory trafficking pursuant to Resolution Conf. 11.3 (Rev. CoP19)**
- **requests Nigeria to report to SC81 on the implementation of action B11 regarding anti-corruption measures pursuant to Resolution Conf. 17.6 (Rev. CoP19)**
- **considers appropriate measures in accordance with Step 4 paragraph f) of the NIAP Guidelines and Resolution Conf. 14.3 (Rev.CoP19) if Nigeria fails to make sufficient progress regarding efforts to conduct joint operations with relevant countries in Africa and Asia to tackle ivory and other wildlife trafficking by SC81.**

## **Vietnam**

Vietnam has been included in the NIAP process as a Party of primary concern since the initiation of the process in 2013.

For more than a decade, Vietnam continues to be exploited by wildlife traffickers as a significant hub for global ivory, rhino horn and other wildlife trafficking. Despite efforts made by the Government to address their involvement, gaps remain particularly in pursuing international cooperation with source and transit countries to conduct investigations to gather tangible evidence to support prosecutions – key actions listed in the Pillar 3 on *International and regional enforcement collaboration* of the Vietnam's NIAP.

Between 2023-24, Vietnam was implicated in the confiscation of approximately 10 tonnes of ivory, accounting for approximately 43 per cent of reported global ivory trafficking cases. This includes more than 7.6 tonnes arriving from Angola in March 2023 and approximately 1.6 tonnes arriving from Nigeria in March 2024.<sup>6</sup>

During this time, Vietnam was also linked to the confiscation of more than 100kg of rhino horn, including 19 horns seized at Maputo airport, Mozambique in February 2024<sup>7</sup>. However, no information relating to intelligence exchange with Angola, Nigeria and Mozambique is provided under Activity 3.2 in Vietnam's progress report to SC78.<sup>8</sup> This is non-compliant with paragraph 14 d) of Resolution Conf. 11.3 (Rev. CoP19) on *Compliance and enforcement*.

In addition, prosecutions for large-scale ivory seizures are rare, undermining deterrence and disruption of ivory trafficking in/to Vietnam. Since 2018, only one of the seven large-scale seizures<sup>9</sup> of ivory (totaling approximately 25 tonnes) made at seaports in Vietnam has been prosecuted.<sup>10</sup> The low rate of prosecutions for these incidents suggests challenges in Vietnam's investigative processes, which may be hindered by factors such as corruption, political will and lack of resources.

In the only large-scale ivory case prosecuted, the defendant was convicted to 10 years' imprisonment for trafficking 615kg of ivory from Nigeria to Vietnam in 2023, although Vietnam failed to conduct a joint investigation with Nigeria to further investigate and target the wider network responsible for the shipment.<sup>11</sup>

Similarly, Vietnam did not pursue cooperation with Nigeria or South Africa in the investigation or prosecution of one defendant implicated in trafficking 10 tonnes of ivory, pangolin scales, rhino horns and lion bones from Nigeria and South Africa to Vietnam between July 2021 and January 2022.<sup>12</sup>

In addition to the need to strengthen cooperation with its counterparts in Africa, Vietnam is also encouraged to engage more effectively with non-governmental organisations, as flagged by the Secretariat under action 3.3, to assess and act on information relating to wildlife crime shared by these organisations.

Corruption plays a critical role in facilitating wildlife trafficking into Vietnam, particularly at key border crossings and ports. Between 2022-23, the CPI score of Vietnam decreased, indicating increasing levels of corruption.<sup>13</sup> Furthermore, Vietnam remains on the 2024 grey list of the Financial Action Task Force (FATF), requiring increased monitoring to tackle money laundering and terrorist financing.<sup>14</sup> However in its current NIRAP 2018-20, anti-corruption measures are not included to tackle ivory and rhino horn trafficking in accordance with Resolution Conf. 17.6 (Rev. CoP19) and paragraph 9 d) of Resolution Conf. 11.3 (Rev. CoP19).

In terms of action 5.1 on developing the national database system of seizures, prosecutions and convictions, EIA agrees with the Secretariat that Vietnam must implement this action to better manage its confiscated ivory, rhino horns and other wildlife specimens. Implementing this action would also aid Vietnam in assessing the progress of prosecutions relating to large-scale seizures as mentioned above.

#### **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for Vietnam**
- **requests Vietnam to update and revise its NIRAP with amendments to include anti-corruption measures pursuant to Resolution Conf. 17.6 (Rev. CoP19)**
- **urges Vietnam to strongly implement actions under Pillar 3 through increasing international law enforcement cooperation with Angola, Mozambique, Nigeria, South Africa and other relevant countries to tackle the illegal trade in ivory and rhino horns pursuant to Decision 19.118 and Resolution Conf. 11.3 (Rev. CoP19)**
- **urges Vietnam to develop the national database of wildlife crime seizures, prosecutions and convictions**
- **considers appropriate measures in accordance with Step 4 paragraph f) of the NIAP Guidelines and Resolution Conf. 14.3 (Rev.CoP19) if Vietnam fails to make progress regarding efforts to conduct joint operations with source and transit countries in Africa to tackle ivory and rhino horn trafficking by SC81.**

## **Category B country assessments and recommendations**

### **Gabon**

Gabon has been in the NIAP process since 2014 as a Party of secondary concern. Even though Gabon submitted its report in time to SC78, the Secretariat's assessment notes that Gabon's report mainly addresses progress from 2022-23, missing the majority of the reporting period in question and is therefore considered incomplete.

Noting the lack of reported progress in Gabon's self-assessment as well as the repetition of information provided in previous self-assessments to SC70, SC74 and SC77, EIA agrees with the Secretariat's proposed lower ratings than those put forward by Gabon. In particular, the limited progress on key activities previously flagged by the Secretariat in its SC77 assessment are of concern, notably D.1 (the signing and/or strengthening of inter-State collaborative protocols on the fight against poaching and ivory trafficking with Cameroon, Central African Republic, Congo and Equatorial Guinea) which appears to have had no progress since the last report, but has been self-assessed as 'substantially achieved'.

Gabon is home to the largest populations of forest elephants and is a major source country for ivory smuggled to Cameroon for export to Asia via Nigeria.<sup>15</sup> Therefore, Gabon should be called upon to increase collaboration with Cameroon and relevant countries in the region to tackle the illegal ivory trade.

The lack of an update regarding Activity E.9 and the associated burning of ivory stocks was also flagged as a gap in Gabon's NIAP reporting at SC77 and EIA agrees with the Secretariat's suggestion that an assessment of 'achieved' is currently premature without further substantive information. While Gabon has provided some further information under activity C.3 (Setting up a local information exchange) regarding the development of a regional Trade in Wildlife Information Exchange (TWIX), EIA concurs with the Secretariat's assessment that using TWIX amounts to "information exchange system at the local level", and therefore progress on this activity should still be rated as 'on track'.

The lack of progress on C.3 further impedes progress on activity D.5 regarding strengthened collaboration for intelligence exchange with specialised agencies, although Gabon has assessed progress on this activity as 'substantially achieved'. EIA suggests a rating of 'partially achieved' is more appropriate.

Having been in the NIAP process for more than a decade, EIA recommends the Standing Committee to urge Gabon to prioritise progressing the implementation of activities D.1 and C.3 in particular and the incomplete activities under Pillar A – Legislation and regulations. With only 12 of 32 priority activities achieved, EIA concurs with the Secretariat's overall assessment of 'partial progress'.

EIA is concerned that Gabon has never been asked to revise its NIAP since inclusion in the NIAP process and encourages the Standing Committee to recommend that Gabon revises and updates its NIAP to ensure it continues to be relevant and effective.

#### **EIA recommends that the Standing Committee:**

- **urges Gabon to prioritise the implementation of activities under Pillar A and activities D.1 and C.3 and to provide more substantive updates in its next progress report to SC81**
- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for Gabon**
- **strongly encourages Gabon to revise and update its NIAP in accordance with the NIAP Guidelines.**

## **Mozambique**

Mozambique has been in the NIAP process as a Category B country 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.

In March 2024, Mozambican authorities intercepted 651 pieces of ivory weighing 4,800kg at Maputo port. This marks the third reported large-scale seizure of elephant ivory exported from Mozambique since 2022. In May 2023, Tanzanian authorities confiscated 166 tusks that had arrived from Mozambique's Pemba airport and the following year Malaysian Customs seized six tonnes of ivory – alongside other wildlife including rhino horns and pangolin scales – exported from Mozambique's Maputo port. However, in its NIAP progress report to SC78, Mozambique does not provide any information on its efforts to investigate these seizures, including whether it has exchange intelligence with the other countries involved.

Since 2020, Mozambique has been implicated in the interception of more than 200kg of rhino horns.<sup>16</sup> Key countries linked to these seizures include South Africa and Vietnam. 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 taken, despite the adoptions 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.



#### **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for Mozambique**
- **urges Mozambique to strongly implement actions under Pillar 3 through increasing international law enforcement cooperation with South Africa, Tanzania and Vietnam to tackle the illegal trade in ivory and rhino horns pursuant to Decision 19.118 and Resolution Conf. 11.3 (Rev. CoP19)**
- **requests Mozambique to report to Decision 19.118 in advance of SC79**
- **considers appropriate measures in accordance with Step 4 paragraph f) of the NIAP Guidelines and Resolution Conf. 14.3 (Rev.CoP19) if Mozambique fails to make progress regarding efforts to conduct joint operations with countries involved to tackle ivory and rhino horn trafficking by SC81.**

## **Category C country assessments and recommendations**

### **Angola**

Angola has been included in the NIAP process as a Category C Party since 2014. EIA believes Angola should remain in the NIAP process despite meeting the minimum threshold of 80 per cent of its NIAP, given the recent and ongoing ivory and rhino horn trafficking implicating Angola during the past two years. Remaining in the process would be in accordance with Step 5 paragraph b) ii) of the NIAP Guidelines.

In March 2023, Vietnamese authorities confiscated a large volume of ivory (7.6 tonnes) arriving from Angola and at SC77 Angola was assessed as an emerging exit point for illegal rhino horn and ivory consignments from Africa to Asia.<sup>17</sup> In its progress report to SC78, Angola notes the involvement of Vietnamese and Chinese nationals in the seizures of more than two tonnes of ivory made at 4 de Fevereiro International Airport between 2018-24. Furthermore, Angola is also recognised as a transit country for rhino horn trafficked out of southern Africa, including Namibia, to Asia. Between 2022-24, more than 200kg of rhino horn have been seized implicating Angola.<sup>18</sup>

However, the current NIAP of Angola does not include any activities promoting international law enforcement cooperation with destination countries in Asia under its fourth Pillar (Pillar D) on "National and international cooperation in combating wildlife crime". This is a major gap in building Angola's long-term resilience to tackle wildlife crime which necessitates a multi-agency and multinational approach.

EIA recommends the Standing Committee to urgently call on Angola to improve communication and intelligence exchange with Vietnam and Namibia to investigate and hold individuals and entities accountable for their offences and report to SC81 on these measures.

#### **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendation that Angola continues to remain in the NIAP process**
- **requests Angola to revise and update its NIAP to include international cooperation measures with Vietnam, Namibia and other relevant transit/destination countries under Pillar D on "National and international cooperation in combating wildlife crime" and report to SC81.**

### **Lao People's Democratic Republic (Laos)**

Laos has been in the NIAP process as a Category C Party since 2014. In more than a decade, Laos has made limited progress, achieving approximately 50 per cent of its NIAP. Laos is currently subject to Article XIII compliance proceedings, including for issues relating to live trade in Asian elephants.

In terms of legislative actions under Pillar A, EIA welcomes the adoption of the CITES Decree in 2022 and the revised Wildlife Law in 2023. However, significant gaps in both documents remain which hinder effective protection against illegal trade threats facing Appendix I listed species, including elephants. For example, the revised Wildlife Law contains an ambiguous interpretation of the concept of "wildlife development" which may in practice still allow breeding of the highly protected species for commercial purposes. The Secretariat should be requested to continue communications with Laos and request a report on progress in addressing gaps and inadequacies remaining in these legislative documents as mentioned under action 1.1.

Regarding action 3.2 on strengthening cooperation with relevant African and Asian countries to tackle ivory trafficking, EIA agrees with the Secretariat's assessment that listing meetings between countries is not a sufficient measure of progress as it does not demonstrate results or impact. Instead, Laos should be encouraged to provide information relating to how intelligence and best practices are shared and used between countries to tackle ivory trafficking.

In its report to SC78, Laos provides limited information on regional cooperation with Vietnam and China, although makes no mention of activities undertaken to cooperate with African source/transit countries. EIA intelligence from 2024 suggests that criminal syndicates continue to exploit Laos as a transit country to smuggle African ivory and other illicit wildlife products into Vietnam and Laos should be requested to increase international cooperation.

In addition, there was limited information regarding ivory seizures and prosecutions during the reporting period between November 2023 and October 2024. Only one case involving ivory (quantity unknown) was detected at Vientiane airport in January 2024. Furthermore, the Golden Triangle Special Economic Zone in Laos has long been recognised as a significant hub for illegal ivory trade targeting Chinese customers. Furthermore, seizures of other elephant parts, such as bones and skins, have been recorded in Laos, including 20kg of skin seized in April 2024.<sup>19</sup> This raises concerns about the illegal trade in non-ivory elephant products, which may threaten Laos' wild elephant populations, especially given reports that 12 individuals were poached in 2023 alone.<sup>20</sup>

#### **EIA recommends that the Standing Committee:**

- **supports the Secretariat's recommendation to agree an overall rating of "partial progress" for Laos**
- **requests Laos to report on efforts made to address gaps and inadequacies remaining in the CITES Decree (2022) and revised Wildlife Law (2023) to SC81**
- **urges Laos to increase cooperation activities with Vietnam and other relevant countries to tackle ivory trafficking and report to SC81.**



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