

EIA'S RECOMMENDATIONS ON NATIONAL IVORY ACTION PLAN

SC81 Docs. 34.1, 34.2, 34.3 and 34.4



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1. OVERVIEW OF THE NATIONAL IVORY ACTION PLAN PROCESS

Established in 2013, the National Ivory Action Plan (NIAP) process supports CITES Parties identified as being of particular concern in relation to the illegal ivory trade.

At CoP19 in 2022, Parties agreed the NIAP process should be reviewed to ensure it remained effective and fit for purpose.¹ The independent Review concluded that, while the NIAP process remained a valuable tool for improving resilience to ivory trafficking and supporting implementation of CITES provisions, a number of improvements were necessary to ensure its continued effectiveness. In particular, the Review identified opportunities to strengthen implementation, assessment, verification, transparency, coordination and long-term relevance. It also highlighted concerns regarding the duration of participation and continued relevance of some NIAPs; at the time of the review, 11 of the 13 participating Parties had been in the process since 2013,

while six were still implementing original action plans which were first accepted between seven and 11 years ago.

At SC78, the Secretariat proposed amendments to the NIAP Guidelines to address aspects of the Review. While these proposals were welcomed by the Standing Committee, it was concluded that they did not fully address all of the Review's findings. Consequently, CoP20 adopted Decision 20.101, directing the Secretariat and Standing Committee to undertake further work on the Review's longer-term recommendations and report to CoP21, including on possible amendments to the NIAP Guidelines.²

The documents for SC81 represent the next phase of this process. They seek to implement elements of the Review through proposed changes relating to indicators and means of verification, consultation with Parties identified through Elephant Trade Information System (ETIS) analyses and additional considerations for identifying Parties that may warrant inclusion in the NIAP process. At the same time, the NIAP implementation assessments submitted for consideration at SC81 highlight persistent implementation gaps, weaknesses in reporting and international cooperation and broader questions

regarding how progress should be assessed and how NIAPs should be kept responsive to evolving trafficking risks.

This briefing focuses on three key issues emerging from the SC81 documents: persistent implementation gaps; the need for more objective assessment of progress and transparent decision-making; and ensuring that NIAPs remain relevant to evolving trafficking profiles and national circumstances.



2. PERSISTENT IMPLEMENTATION GAPS

As presented in SC81 Doc. 34.1, implementation progress across the 12 current NIAP Parties remains uneven.

The Republic of the Congo (Congo), a Category C Party, has completed only 12 per cent of its NIAP actions – the lowest level of progress among the assessed Parties – despite more than a decade in the process. This raises broader questions regarding how the NIAP process responds to prolonged non-implementation and whether additional measures may be needed where Parties remain in the process for extended periods with limited progress. The Secretariat notes that Mozambique and Togo (Category A) and Cameroon (Category C) have also made limited progress, prompting a recommendation to urge these Parties to accelerate implementation of their NIAP commitments and to identify any technical assistance needed to address outstanding challenges.

Across the NIAP pillars, while progress has generally been reported in legislative reform, national enforcement capacity and awareness-raising, significant gaps remain in demonstrating enforcement outcomes, operationalising regional and international cooperation and ensuring consistent reporting.

A recurring theme across Party reports is that implementation is often measured by activities undertaken rather than outcomes achieved, making it difficult to assess whether reported actions are translating into meaningful reductions in wildlife trafficking or improvements in enforcement effectiveness.

LIMITED EVIDENCE OF ENFORCEMENT OUTCOMES

Across NIAP reporting, law enforcement agencies appear to have received training and participated in meetings supported by intergovernmental organisations (IGOs) and non-governmental organisations (NGOs) to strengthen enforcement capacity and inter-agency collaboration. Nigeria, for example, established a Wildlife Law Enforcement Task Force to improve coordination. However, limited information is available on whether these initiatives have translated into measurable enforcement outcomes, including coordinated investigations, prosecutions or disruption of trafficking networks.

Furthermore, seizures remain a key indicator of enforcement activity in NIAP progress reports,

but information on subsequent investigations and prosecution outcomes is often lacking. For example, Vietnam reported nine wildlife trafficking cases between November 2024 and August 2026; however, the progress report did not include information on arrests or prosecution outcomes, limiting assessment of enforcement effectiveness.³

The current emphasis on seizure numbers and enforcement activities provides only a partial picture of implementation progress. Information on investigation outcomes, trafficking networks and key facilitators, arrests, prosecutions and convictions, asset seizures and financial investigations and evidence of disruption to trafficking operations would allow a more comprehensive assessment of enforcement effectiveness.

WEAK INTERNATIONAL AND REGIONAL ENFORCEMENT COOPERATION

Pillar 3 of the NIAP process requires Parties to report on actions taken and outcomes achieved in strengthening regional and international cooperation to combat wildlife trafficking. However, the existence of formal cooperation agreements does not necessarily demonstrate that they are being operationalised. For example, EIA is concerned by the lack of reported progress in implementing Mozambique's cooperation arrangements with Vietnam under their Memorandum of Understanding (MoU) and Mutual Legal Assistance Treaty (MLAT), signed in 2017 and 2020, respectively.⁴

The scale and geographic breadth of trafficking networks linked to Vietnam further underscore the importance of effective cross-border cooperation. According to EIA's seizure database, approximately 21 tonnes of ivory were seized in 15 large-scale seizures between 2023 and October 2026. Four of these seizures involved Vietnam, accounting for approximately 11 tonnes of ivory – more than half of the total. In addition, at least 14 rhino horn seizures, involving more than 150kg, implicated Vietnam between 2024 and October 2026. Recent trafficking cases have linked Vietnam to source, transit and destination countries across Africa and Asia, including Angola, the Democratic Republic of the Congo (DRC), Mozambique, Nigeria, South Africa, the Lao's People Democratic

Republic (Lao PDR) and Thailand. These cases underline the need for stronger coordinated enforcement across source, transit and destination countries.

EIA welcomes Vietnam's revised NIRAP for 2026-28 and its efforts to strengthen cooperation with source and transit countries, including the signing of a MLAT with Angola in August 2025 and its ongoing efforts to establish an MoU with Nigeria. These initiatives provide opportunities to strengthen cross-border enforcement, but their effectiveness will depend on implementation and demonstrable outcomes.

The NIAP process should therefore place greater emphasis on assessing the operational outcomes of international and regional cooperation, rather than the existence of formal agreements alone. Progress reporting should capture evidence of intelligence-sharing, joint investigations, coordinated operations and their outcomes, including action taken against trafficking networks operating across jurisdictions. This would enable the Standing Committee to better assess whether cooperation commitments are translating into effective action against transnational wildlife trafficking.

These challenges reinforce the findings of the independent NIAP Review, which identified the need for stronger indicators, means of verification and more objective assessment of NIAP implementation. The development of indicators and associated means of verification under SC81 Doc 34.2 provides an opportunity to address this gap. EIA considers that these should be developed through a transparent and consultative process involving Parties, International Consortium on Combating Wildlife Crime (ICWC) partners, relevant experts and observers ([see EIA's recommendations on SC81 Doc. 34.2 for further details](#)).

INCONSISTENT REPORTING AND ACCOUNTABILITY

Regular and timely reporting is essential to monitoring illegal ivory trade trends and ensuring that decisions under the NIAP process are informed by reliable, up-to-date information. However, persistent gaps in ETIS reporting and ivory stockpile declarations undermine transparency, limit the assessment of implementation progress and constrain the identification of ongoing trafficking risks.

According to ETIS Data Aggregates, reporting by several NIAP Parties remains irregular.⁵ Congo, for example, has not submitted ETIS reports since 2007, a gap highlighted by the Secretariat in SC81 Doc. 34.1. EIA is further concerned that neither Congo nor Cameroon has included the reporting pillar in its NIAP, despite this being one of the five pillars of the NIAP process under Step 2(a) of the NIAP Guidelines.^{6,7} Other Parties, including the DRC and Nigeria, have each submitted only one ETIS report since 2016. EIA therefore considers that Parties with persistent deficiencies in ETIS reporting, including Nigeria, should receive targeted recommendations to improve reporting in the same manner proposed for Congo under SC81 Doc 34.1.

In addition, as highlighted in SC81 Doc. 56, only 22 per cent of seizure records reported to ETIS between 2017-25 contained trade-route data, compared with 58 per cent between 2008-16. These gaps limit the ability to identify trafficking routes, understand the links between seizures and assess the risks posed by individual Parties.

Given the central role ETIS data plays in identifying trafficking trends and informing Party assessments, EIA considers that timely and complete ETIS reporting should form part of the indicators and associated means of verification proposed under SC81 Doc. 34.2.

Ivory stockpile reporting presents a related concern. The Secretariat's analysis in SC81 Doc. 56 identified 15 Parties that recovered ivory at MIKE sites between 2021-25 but did not submit stockpile reports during the same period and 36 Parties that reported ivory seizures to ETIS but have never submitted a stockpile report. Despite some overlap in the Parties identified in both analyses, these findings nevertheless highlight significant gaps in the information available on the disposition, management and potential storage of recovered and seized ivory.

Half of the Parties currently participating in the NIAP process were identified through one or both analyses, despite being among those countries subject to enhanced scrutiny because of their involvement in the illegal ivory trade. Against a backdrop of approximately 21 tonnes of ivory seized in large-scale seizures between 2023 and October 2026, these findings reinforce the need for improved stockpile reporting, forensic analysis and traceability measures. Forensic analysis can help identify the origins of seized ivory, support investigations and prosecutions, and strengthen understanding of potential links between stockpiles and illegal trade ([see EIA's recommendations on SC81 Doc. 56 for further details](#)).

In the *World Wildlife Crime Report 2024*, UNODC cited approximately 1,500 tonnes of ivory in registered government stockpiles in 2022, based on CITES analysis available at the time.⁸ By February 2026, CITES had received declarations totalling 797 tonnes from 24 Parties.⁹ These figures are not directly comparable, as reporting coverage and the Parties declaring their stocks may differ; nevertheless, the disparity underscores the need for consistent declarations and transparent explanations of significant changes in reported stock levels. This is particularly important given continued large-scale seizures since 2023. Incomplete stockpile information makes it harder to assess whether ivory from government-held or other stockpiles may be entering illegal trade and to interpret seizure trends alongside reported changes in poaching.

The reporting gaps identified above have implications beyond transparency and accountability. Limited ETIS reporting, incomplete trade-route information and inconsistent stockpile declarations constrain the ability to assess implementation progress, identify emerging trafficking risks and determine whether existing NIAPs remain appropriately targeted. These factors should therefore be taken into account when evaluating implementation progress and considering future actions under the NIAP process.

3. THE NEED FOR MORE OBJECTIVE ASSESSMENT AND TRANSPARENT DECISION-MAKING

Assessing NIAP implementation requires more than recording actions reported by Parties; it requires verification as to whether those actions have been implemented and delivered meaningful outcomes.

While Parties' progress reports are an essential source of information, self-reporting alone cannot provide a sufficiently objective basis for assessing progress where supporting evidence and measurable outcomes are lacking.

The Secretariat's assessments have consistently indicated lower levels of implementation than those reported by Parties, underscoring the need for a more systematic and evidence-based approach to verification. The NIAP Guidelines already allow the Secretariat to call on experts as relevant, providing a basis for strengthening this process. EIA reiterates its willingness to support the Secretariat in assessing Parties' progress reports.

The review of the NIAP process recognised the need for more objective and consistent assessments, including through indicators and associated means of verification, and consideration of an advisory mechanism. Several of the recommendations presented under SC81 Docs. 34.2, 34.3 and 34.4 seek to operationalise these findings, but could be further strengthened.

In particular, EIA welcomes the Secretariat's proposals to develop indicators and means of verification under SC81 Doc 34.2, but considers that these should be developed together through consultation with Parties, ICCWC partners, relevant experts and observers and submitted to the Standing Committee for consideration before implementation.

The Review also suggested consideration of an advisory mechanism to strengthen verification and objectivity

within the NIAP process. EIA therefore encourages the Standing Committee to explore how existing mechanisms, including the MIKE-ETIS Technical Advisory Group, could support independent review, verification and assessment of NIAP implementation. This would provide a practical means of strengthening verification and objectivity while addressing the resource and membership concerns raised by the Secretariat regarding a dedicated advisory body.

Separately, decisions on which Parties may warrant inclusion in the NIAP process must also draw on a broader and more transparent evidence base. EIA welcomes the proposals in SC81 Docs. 34.3 and 34.4 to strengthen consultation with Parties identified through ETIS analyses and consider additional factors, including organised criminal activity, law enforcement responses and international cooperation. These factors can provide important context that seizure data alone cannot capture. EIA recommends also including forensic analysis of seized ivory and ivory stockpile reporting and management, which can help clarify trafficking routes, identify criminal networks and assess potential sources of ivory entering illegal trade. The relevance of these considerations should be assessed transparently, with a clear rationale for decisions on a case-by-case basis.

Together, these measures would strengthen the credibility and consistency of the NIAP process by ensuring that assessments of implementation are supported by verifiable evidence and that decisions on Party participation are based on a transparent assessment of trafficking risks.

4. KEEPING NIAP RELEVANT TO NATIONAL TRAFFICKING PROFILES

Wildlife trafficking increasingly involves convergence across different commodities, with overlapping trafficking routes, transit hubs, facilitators and organised criminal networks.

Although the NIAP process was established to address Parties of particular concern in the illegal ivory trade, several Parties, including Mozambique, Vietnam and the UAE, have recognised links between ivory and rhino horn trafficking through the development of National Ivory and Rhino Action Plans (NIRAPs).

As trafficking patterns evolve, it is important that NIAPs remain aligned with the most significant ivory trafficking risks associated with participating Parties. In some cases, these risks may be linked to broader trafficking networks which are also involved in other wildlife commodities, particularly rhino horn. Periodic review of NIAPs can therefore help ensure that actions remain targeted, proportionate and responsive to

changing trafficking dynamics, while maintaining a clear focus on addressing illegal ivory trade.

Recent evidence concerning Angola and Lao PDR raises the question of whether their existing NIAPs adequately reflect their current trafficking profiles. EIA's seizure database links Angola to at least 12 rhino horn seizures since 2023, eight of which also involved Vietnam. Lao PDR has been implicated in at least 11 rhino horn trafficking cases since 2024, including a 2025 seizure in South Africa of more than 55kg destined for the country. In June 2026, Lao authorities seized more than 500 pieces of rhino horn in raw, semi-worked and worked forms.¹⁰

For both countries, the evidence suggests that rhino



horn trafficking has become a significant component of their current wildlife crime profile. EIA therefore recommends expanding their action plans to address rhino horn trafficking alongside ivory to support a more coordinated response through existing enforcement and cooperation mechanisms, including intelligence-sharing, investigations, prosecutions, financial investigations and international collaboration ([see EIA's recommendations on SC81 Doc 34.1 for further details](#)). Such an approach would also reflect the increasing convergence of ivory and rhino horn trafficking and the role of organised criminal networks operating across multiple wildlife commodities.

Given the significant involvement of both Angola and Lao PDR in rhino horn trafficking cases, limiting their action plans to ivory may fail to address some of the principal wildlife crime risks currently associated with these Parties. Revising their NIAPs into NIRAPs, while maintaining progress on outstanding NIAP

commitments, would help ensure that the process remains responsive to evolving trafficking risks without expanding its scope indiscriminately. This would be consistent with the approach already adopted by Mozambique and Vietnam.

Maintaining the relevance of NIAPs also depends on access to reliable information on current and emerging trafficking risks. While ETIS analyses remain central to identifying Parties of concern in the illegal ivory trade, the complementary considerations proposed in SC81 Doc. 34.4 could help provide a more complete picture of national trafficking profiles, particularly where ETIS reporting is incomplete or where emerging risks may not be fully reflected in seizure data alone. Incorporating these additional sources of information could support more targeted and responsive action plans, helping to ensure that NIAPs continue to reflect current trafficking challenges and enforcement priorities.



5. CONCLUSION AND RECOMMENDATIONS

The NIAP process remains an important mechanism for addressing illegal ivory trade and supporting Parties in strengthening their responses to ivory trafficking.

EIA welcomes the continued engagement of all 12 current NIAP Parties and recognises the progress made by several Parties towards achieving their action plan objectives. However, the assessments presented for SC81 demonstrate that significant challenges remain.

The ongoing implementation of the NIAP Review provides an important opportunity to address these challenges. EIA therefore encourages the Standing Committee to build on the Secretariat's proposals in SC81 Docs. 34.1, 34.2, 34.3 and 34.4 by strengthening objective assessment and oversight of implementation, developing

indicators and associated means of verification through a transparent and consultative process, improving reporting and accountability and ensuring that NIAPs remain aligned with current trafficking profiles and risks.

Together, these measures would help ensure that the NIAP process remains credible, targeted and effective in addressing evolving illegal ivory trafficking threats.

EIA's specific recommendations regarding SC81 Docs. 34.1, 34.2, 34.3 and 34.4 are provided below.

DOC. 34.1 IMPLEMENTATION OF THE NATIONAL IVORY ACTION PLAN PROCESS [(RESOLUTION CONF. 10.10 (Rev. COP20), ANNEX 3), STEP 4]]

EIA encourages the Standing Committee to support recommendations in paragraph 34 of the document with an additional proposed recommendation 34 (c)(iii) directed to Nigeria and further amendments to recommendations 34(f)(ii) directed to Angola; 34(h)(ii) directed to Cameroon; 34(i)(iii) directed to Congo; and 34(j)(ii) directed to Lao PDR, as follows (additions are underlined and deletions are in ~~strikethrough~~):

NIGERIA

c) The Standing Committee is invited to:

iii) urge Nigeria to submit information on seizures of elephant ivory to the Elephant Trade Information System (ETIS) in advance of the next assessment.

ANGOLA

f) The Standing Committee is invited to:

ii) agree that Angola should remain in the NIAP process at present and request the Party to revise and update its NIAP into a National Ivory and Rhino Action Plan (NIRAP), ~~incorporating actions~~, in accordance with Step 5, paragraph b), subparagraph i) of the Guidelines, to address current and emerging illegal trade risks concerning ivory, ~~including, if appropriate, actions concerning~~ and specimens of rhinoceros, while continuing the implementation of outstanding NIAP actions; and

CAMEROON

h) The Standing Committee is invited to:

iii) request Cameroon to revise and update its NIAP in accordance with Step 2) paragraph a) subparagraph ii) of the Guidelines and urge Cameroon to accelerate implementation of the outstanding actions in its NIAP and to provide clear, updated and action-specific information against the actions' milestones and indicators in its progress report to be submitted to the next regular meeting of the Standing Committee; and

CONGO

i) The Standing Committee is invited to:

iii) request Congo to revise and update its NIAP in accordance with Step 2) paragraph a) subparagraph ii) of the Guidelines and urge Congo to accelerate implementation of the outstanding actions in its NIAP;

LAO PDR

j) The Standing Committee is invited to:

ii) agree that the Lao People's Democratic Republic should remain in the NIAP process at present due to significant levels of illegal trade in ivory and request the Party to revise and update its NIAP into a National Ivory and Rhino Action Plan (NIRAP); and

DOC. 34.2 REVIEW OF THE NATIONAL IVORY ACTION PLANS PROCESS (DECISION 20.101)

EIA encourages the Standing Committee to support the Secretariat's proposed recommendations under paragraphs 25(a), 25(c) and 25(d) and to amend paragraph 25(b) as follows (additions are underlined and deletions are in ~~strikethrough~~):

b) request the Secretariat to:

i) amend the templates for the development of NIAPs and NIAP progress reports to include ~~means of verification linked to NIAP actions and~~ provision for the submission of relevant supporting documentation with the reports, as well as information on the renewal or extension of timelines for NIAP actions that were not achieved within the originally established timeframe;

ii) to the extent possible, publish progress reports on the NIAP webpage within 10 days of their receipt from Parties; and

~~iii) compile a list of indicators used in previous and existing NIAPs that are considered sufficiently relevant and adaptable for use in other contexts for Parties to consider when developing or revising their NIAPs; to issue a Notification to the Parties seeking the views of Parties, ICCWC partners, relevant experts and observers on indicators and associated means of verification for the NIAP process; to compile, on the basis of the responses received, a repository of indicators and associated means of verification; and~~

iv) further consider options for strengthening verification and objectivity in the NIAP process, including by consulting with the MIKE-ETIS TAG on the potential for them to play an advisory role in the review of NIAP progress; and

v) consider, where a Party remains in Category A across successive ETIS analyses, experiences a deterioration in ETIS categorisation, or is implicated in significant ivory seizures, whether the Party's NIAP remains fit for purpose and, where appropriate, provide recommendations to the Standing Committee.

DOC. 34.3 CONSULTATION PROCESS WITH PARTIES IDENTIFIED IN THE ETIS REPORTS IN THE IMPLEMENTATION OF STEP 1 b) AND c) OF THE NIAP PROCESS (DECISION 20.95)

EIA encourages the Standing Committee to support the adoption of the recommendations in SC81 Doc. 34.3 and note the relevance of this document in discussions regarding SC81 Doc. 34.2 concerning verification and objectivity in the NIAP process.

DOC. 34.4 GUIDANCE ON PARTY-SPECIFIC COMPLIANCE MEASURES INFORMED BY THE ETIS REPORT (*DECISION 20.102*)

EIA encourages the Standing Committee to adopt the recommendations in SC81 Doc. 34.4, subject to the following two additions to the indicative and complementary elements proposed for inclusion under paragraph d) of Step 1 of the Guidelines to the National Ivory Action Plan Process, contained in the annex of this document:

- Forensic analysis of seized ivory, particularly large-scale ivory seizures, and the use of resulting information to support enforcement action;
- Ivory stockpile reporting and stockpile management information;



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