

National Ivory Action Plans Process¹

EIA Recommendations to the 75th Meeting of the CITES Standing Committee (SC75), November 2022

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China

Summary

The Secretariat recommends SC75 to *not include* China in the NIAP process. The Secretariat concludes China should continue the implementation of measures and activities to address illegal trade in ivory, and it is unlikely that requesting the Party to develop and implement a new NIAP will have any significant impact beyond the measures that the Party has already put in place and continues to pursue.

EIA does not concur with the Secretariat's assessment.

China left the NIAP process at SC70 despite showing continuing signs of ongoing ivory trafficking. The ETIS report to CoP19 continues to identify China as a Category B Party and concludes that despite showing strong commitment to curb domestic ivory trade and aggressive investigation and prosecution of its nationals involved in overseas wildlife trafficking, China still remains a *primary destination* for illegal ivory. There has been no marked improvement in ETIS' categorisation for China in recent years - ETIS reports for CoP16 and CoP17 identified China as Category A and the report to CoP18 identified China as Category B.

In Annex 4, China recognises that illegal ivory trade continues to be present a problem in the country, highlighting that seizures in country indicate the presence of the problem as well as China's determination to tackling the issue.

¹ SC75 Doc. 7.4: National Ivory Action Plans Process-Report of the Secretariat

EIA would query China's statement that the ETIS report exaggerates the scale of illegal ivory trade involving China. The ETIS report clearly states the percentage of large-scale seizures taken place in China (9 per cent). However, the estimation of the scale of illegal ivory trade involving China must take into account the seizures made in source or transit countries pointing to China as the end destination, which is what ETIS has done and based their recommendation upon. Notable large scale seizures involving China as the end destination include two of the three largest seizures ETIS ever recorded (one in China and one in Singapore). ETIS analysis showed that China ranked fourth for the total seized weight that implicated the Party. Thus, current seizure data indicates that China is a significant Party affected by the illegal ivory trade.

While EIA commends China's efforts to counter illegal ivory trade by Chinese tourists in Africa, the high quantity of worked ivory seized in China supports the notion that China continues to be a major end consumer country of illegal ivory (e.g., compared to Vietnam where mostly raw ivory was seized). There are seizures involving both raw and worked ivory in and outside China involving Chinese nationals or with China as the destination, with transport methods ranging from personal luggage, post, to sea freight. Therefore, the suggestion that the illegal trade of worked ivory is only due to tourists may be an underrepresentation of the true nature of the illegal trade. EIA would encourage China to increase its efforts to deter tourists and traffickers as the high number of seizure incidents, as well as EIA intelligence, indicates China continues to be significantly impacted by the illegal ivory trade. China should also be urgently encouraged to increase collaboration with key export countries such as Nigeria to bring Chinese ivory traders based in other countries to justice.

EIA Recommendations to SC75

- Commend China for its commitment to pursue and dismantle crime syndicates operating domestically and abroad
- In light of China's ongoing identification by ETIS as a country of concern, there is a need to urgently review the entry/exit criteria in the NIAP process as part of the review called for in CoP19 Doc 66.7. China left the NIAP process at SC70 despite displaying worrying ivory trafficking trends and four years on, continues to present concerning levels of illegal trade. A review of the NIAP process should emphasise that countries should only be allowed to leave the process when/if they no longer present as a country of concern for trafficking trends. This would prevent premature exit and "recidivist" cases such as China's identification in the most recent ETIS report.
- Noting China's response highlights its commitment to combating illegal trade, and in particular that it has been successfully making large-scale seizures "demonstrating its ability and determination to solve this problem", EIA would caution against concluding that seizures alone demonstrate long-term ability and determination to tackle trafficking. This level of commitment is instead evidenced in successful prosecution rates.
- Compared to most other countries impacted by the illegal ivory trade, China has a good online platform which publicises a portion of its wildlife crime prosecution outcomes. However, not all court verdicts are made public, and not all ivory seizure cases appear to be prosecuted. Based on the documents on non-prosecution decisions, it is unclear why certain cases were prosecuted and certain were not. The inconsistency undermines effective deterrence of the illegal trade. EIA recommends the Chinese government to be more transparent with its prosecution data to set a good example for other countries impacted by the illegal ivory trade.
- EIA rejects the Secretariat's notion that a new NIAP would not have any significant impact beyond the measures that the Party has already put in place and continues to pursue. We call upon the government of China to see a new NIAP as an opportunity and facilitating tool to standardise the law enforcement and prosecution efforts within the country, collaborate with source and transit countries of illegal ivory to disrupt the trafficking chain, bring any Chinese

nationals involved in ivory trafficking either in China or abroad to justice, and lead demand reduction efforts following the guideline published by the CITES Secretariat (CoP19 Doc. 38).

Angola

Summary

Angola was first directed to develop a NIAP at SC65 and has not been required to update it since. The ETIS reports prepared for CoP16 to CoP18 identified Angola as a Category C Party. The ETIS report prepared for CoP19 no longer identifies Angola as a priority Party. Angola did not submit a progress report in time for SC74 in accordance with the Guidelines and submitted its overdue report within 60 days of the conclusion of SC74. For SC75, the Secretariat recommends an overall rating of "limited progress" for Angola.

Since 2015, Angola has emerged as a country of concern for rhino horn trafficking into Vietnam through airports. This trend coincided with concerning levels of rhino poaching in neighbouring Namibia where Vietnamese nationals have also been implicated in the trafficking of rhino horn from Namibia into Angola. Angola has also been exploited by Vietnamese-led syndicates for trafficking ivory, in which since 2022, at least 43 Vietnamese nationals have been arrested globally for trafficking ivory from Angola to Asia.

In 2019, the Supreme People's Procuracy of Vietnam has signed a Memorandum of Understanding (MOU) with the Attorney General of Angola on mutual legal assistance in criminal matters.² In June 2022, through a visit to Vietnam, the Attorney General of Angola has discussed with their Vietnam counterpart on developing a Mutual Legal Assistance Treaty (MLAT) to strengthen cooperation between two countries on tackling criminal matters.

EIA Recommendations to SC75

- Agree to the Secretariat's overall rating of "limited progress"
- Reject the Secretariat's suggestion for Angola to provide an oral update at SC75 in the absence of sufficient detail in its report to SC75. EIA reminds Parties and the Secretariat that oral updates run contrary to the NIAP Guidelines and do not provide sufficient time to assess progress or to inform decision-making
- Request Angola to accelerate its MLAT in criminal matters signing process with Vietnam to establish an official mechanism to combat transnational crimes, including ivory and rhino horn trafficking between two countries
- Request Angola to include an activity in its NIAP to develop its bilateral cooperation with Vietnam under Category C (Intelligence and Investigatory Services) to exchange intelligence and conduct joint investigations to disrupt networks trafficking ivory and rhino horns between two countries.

Cameroon

Summary

Cameroon was first requested to develop a NIAP at SC65 and has not been required to update it since.

The ETIS reports prepared for CoP16 and CoP17 identified Cameroon as a Category B Party, whilst the ETIS report prepared for CoP18 identified Cameroon as a Category C Party. The ETIS report prepared for CoP19 no longer identifies Cameroon as a priority Party. For SC74, Cameroon failed to submit a progress report in accordance with the Guidelines and submitted an overdue report

² <https://www.vksndtc.gov.vn/tin-tuc/tin-hoat-dong-vksnd-toi-cao/dam-phan-hiep-dinh-tuong-tro-tu-phap-ve-hinh-su-gi-d2-t10331.html>

within 60 days of the conclusion of SC74. For SC75, the Secretariat has recommended an overall rating of "limited progress" and calls of Cameroon to intensify its efforts to seek funding for the effective implementation of NIAP activities. EIA concurs with the Secretariat's rating of 'limited progress' though notes with concern the following:

EIA research and investigations highlight Cameroon as a key source, transit and consolidation country for ivory sourced in West and Central African region, including the involvement of trafficking networks in Cameroon that are linked to Nigeria, a key hotspot of illegal trade. EIA advises Cameroon to urgently expedite implementation of its NIAP in light of these findings.

Regarding activity 5.1.1 "undertake independent audit of ivory stockpile management": EIA notes with concern that Cameroon opted instead to undertake an internal audit "for security reasons". In interest of transparency and to adhere to Guidelines, more clarity should be sought regarding Cameroon's choice to conduct an internal audit instead of an independent audit, noting in particular that changes to NIAP activities should be undertaken in consultation with the Secretariat (and the Secretariat did not flag this in its assessment).

Regarding activity 5.7.2, Cameroon notes that the number of missions undertaken to follow up of litigation in high-pressure areas has been "substantially achieved" though also notes that this activity been on hold since 2018. EIA believes 5.7.2 should be revised to 'partial progress'.

Regarding activity 5.7.3, EIA is concerned that the ETIS report to CoP19 flags Cameroon as Category C and Secretariat notes this is a positive development, even though Cameroon has failed to make considerable progress in ivory trafficking case-follow ups (prosecutions) (5.7.3)- which is a long-term indicator of capacity and prioritisation to tackle ivory trafficking. This is especially worrying to EIA whose ongoing investigation findings show Cameroon acts as a key source, transit and consolidation country for ivory sourced across the region.

It is unclear why Cameroon rates "substantial progress" for activity 5.7.4 "monitor effective execution of court decisions", despite concluding "partial progress" has been made for activity 5.7.3 "monitoring of litigation, number of cases brought to court." Without making substantial progress to bring cases to court, it is unlikely that substantial progress can be made in the effective execution of court decisions.

EIA Recommendations to SC75

EIA recommends Parties to agree to the Secretariat's assessment of "limited progress" and request Cameroon to urgently expedite progress. Furthermore EIA:

- Calls for expedited progress to be made by Cameroon to address organised criminal syndicates involved in ivory poaching and trafficking
- Calls for Cameroon to urgently expedite case follow-up, investigations and crucially prosecutions
- In context of NIAP review CoP19 Doc.66.7, draws attention to fact Cameroon has never updated or revised its NIAP since inclusion in process at SC65
- Calls for Cameroon to revise its NIAP to include anti-corruption measures as matter of urgency
- In Step 4 of the NIAP Guidelines "monitoring of implementation", calls on the Secretariat to increase involvement of independent experts in assessments of NIAP reports. As Cameroon's progress report highlights, self-assessments may lead to unclear and inconsistent reporting which external oversight can address.
- Encourages Cameroon to continue making progress in reporting to ETIS in timely fashion (5.6.1), noting that Cameroon did not report between 2017-2020, though reported in 2021.

DR Congo

Summary

DRC was first requested to develop a NIAP in 2015 and updated it in 2018.

At SC74, DRC failed to report using the NIAP template and failed to report on all NIAP activities. As a result, DRC was requested to submit another progress report within 60 days of the conclusion of SC74 which it did. For SC75, the Secretariat recommends an overall rating of “limited progress”, which EIA concurs with.

However, DRC must be urgently called upon to expedite progress under the NIAP process as the illegal wildlife trade situation in, and linked to, DRC has deteriorated significantly. DRC has been elevated from Category C to the highest level, Category A, in the ETIS CoP19 report in recognition of the seriousness of the threats facing DRC. EIA notes that since acceding to CITES, DRC has faced persistent challenges with implementation of the Convention, including the NIAP process. For this reason, EIA concurs with the Secretariat’s recommendation that in the absence of sufficient progress by SC77, compliance proceedings should be instigated against DRC under the NIAP process.

From 2018 to 2020, the DRC had the highest volume of illegal ivory trade that was not detected in country (i.e., weight out), which in total consisted of 31% of the implicated trade volume by weight for the 65 countries included in the ETIS analysis. The report furthermore highlights that the two largest seizures ever recorded in ETIS were exported from DRC in 2019 and constituted over 83% of the 21.5 tonnes of reported seized ivory that implicated the DRC. In this context, it is worth noting that the report states that during the same time the DRC reportedly seized only 329 kg of ivory in country, and that the DRC itself has not reported to ETIS since 2016. DRC also presents extremely worrying levels of corruption as well as the highest “Organized Crime Index” score of 193 countries. However, DRC’s NIAP does not contain any activities to tackle corruption and should be requested to develop and implement these urgently.

EIA Recommendations to SC75

Agree with Secretariat’s assessment of “limited progress” and call on DRC to urgently expedite progress especially pillars C on information related to crimes and E on law enforcement operations. Furthermore:

- In the absence of sufficient progress by SC77, Parties should consider the Secretariat’s recommendation to instigate compliance proceedings
- Urge DRC to seek assistance under Compliance Assistance Programme
- Call for DRC to revise its NIAP to include anti-corruption measures and to action these as matter of urgency
- Encourage DRC to report to ETIS in a timely and proper manner
- Encourage DRC to improve regional and international collaboration to address transnational organised criminals trafficking ivory and other wildlife.

Ethiopia

Summary

The ETIS reports prepared for CoP16 and CoP17 identified Ethiopia as a Category B Party, whilst the ETIS report prepared for CoP18 identified Ethiopia as a Category C Party. The ETIS report prepared for CoP19 no longer identifies Ethiopia as a priority Party and the Secretariat recommends SC75 permit Ethiopia to leave the NIAP process on account of Ethiopia self-assessing that 80% of NIAP actions have been substantially achieved, with remaining NIAP activities “on track”.

Ethiopia did not submit a progress report to SC74 in accordance with the Guidelines and as directed by SC74 submitted a late report within 60 days of the end of SC74.

EIA Recommendations to SC75:

- To prevent premature exit from the NIAP process, which has been the case for many Parties, it is recommended that the Standing Committee seeks clarity from Ethiopia regarding the status of the following key NIAP activities:
 - 1.1 improving legal framework on wildlife crime: in particular, to determine whether the draft amendment to the Wildlife Act has been passed into law.
 - 3.1 improve international cooperation and collaboration to combat illegal ivory trade and trafficking: to determine whether Ethiopia has signed any cross-border and regional cooperation agreements
- EIA encourages SC75 to review the Secretariat's assessment of Ethiopia's progress report which draws conclusions of enforcement effort based on essentially one indicator. In the first instance the increase in seizures made by Ethiopia between 2018-2020 is interpreted as "demonstrating increasing law enforcement efforts", while the same analysis characterises the decrease in seizures linked to Ethiopia as a "positive result". SC75 should consider the reliability on seizure data in making conclusions about Ethiopia's progress under the NIAP process. Instead, emphasis should be placed on assessing the *impact* of NIAP activities. Seizures alone are a poor indicator of both trafficking incidents and effective, sustainable law enforcement response in investigating, prosecuting and dismantling wildlife trafficking networks, and do little to showcase impact of NIAP activities. Seizures alone do not *prevent* poaching/trafficking. Instead, a range of indicators, including prosecution rates, should be used as a measure of a country's law enforcement effort. There is no evidence in Ethiopia's progress report of any criminal justice outcomes for ivory trafficking cases. Activity 2.1 'increase prosecution rates for illegal ivory trade and trafficking', does not provide evidence of impactful change (such as reported increases in number of prosecution/conviction outcomes), but lists numerous trainings delivered for prosecutors, judges etc.
- EIA recommends seeking clarity on these points before considering Ethiopia's exit from the process.

Mozambique

Summary

Mozambique was first requested to develop a NIAP at SC65 and upon request later finalised an updated National Ivory and Rhino Action Plan (NIRAP) after SC71. Mozambique failed to submit a progress report to SC74 in accordance with the NIAP Guidelines timelines and reporting templates and later submitted, as directed by the SC, its overdue report within 60 days of the end of SC74.

The ETIS report prepared for CoP18 identified Mozambique as a Category A Party whilst the ETIS report prepared for CoP19 identifies Mozambique as a Category B Party.

For SC75, the Secretariat recommends an overall rating of "partial progress" though explicitly encourages Mozambique to expedite progress in tackling Vietnamese crime syndicates operating from the country by undertaking joint operations and further strengthening information and intelligence exchange, drawing upon relevant agreements signed with Vietnam as appropriate. Of the rhinoceros specimen seizures made in Mozambique for which information on the country of destination was available, 75% of seizures were destined for Vietnam. Similarly, of the seizures made elsewhere that identified Mozambique as country as origin, 64% indicated Vietnam as country of destination.

In 2017, Mozambique and Vietnam agreed an MoU on Cooperation in Wildlife Conservation and Protection, followed in 2018, by the adoption of a Mutual Legal Assistance Treaty (MLAT), which came into effect in September 2020, to facilitate law enforcement cooperation between the two countries to tackle wildlife trafficking. However, there has been little cooperation between Mozambique and Vietnam to conduct joint investigations to disrupt Vietnamese-led transnational crime networks implicated in ivory and rhino horns, as highlighted in CoP18 Doc. 83.1. According to Mozambique's NIRAP progress report, only three traffickers have been detained (two in Vietnam, one in Mozambique) under the scope of the MLAT implementation to date.

Mozambique has provided few details on joint-law enforcement investigations with Vietnam (or other Parties) in recent years. As highlighted in CoP19 Doc. 75 (Rev. 1) Annex 4, Mozambique did not provide a written or oral report on rhino horn seizures or law enforcement activity at SC74 despite being directed to report to the Standing Committee on these activities pursuant to Decision 18.111. The "establishment of a formal Ivory and Rhino Horn Stockpile Management Programme" is a core feature of Mozambique's NIRAP, however Mozambique has not declared rhino horn stockpile information to the CITES Secretariat since 2018.

EIA Recommendations to SC75

Agree to the Secretariat's assessment of "partial progress" though urge expedited progress by Mozambique, in particular:

- Request Mozambique and Vietnam to increase their enforcement collaboration to conduct intelligence-led and financial-led investigations into Vietnamese crime networks trafficking ivory and rhino horns between two countries in accordance with Decision 18.111 and draft decision 19.DD in CoP19 Doc. 75 (Rev. 1), noting that detailed information and intelligence on Vietnamese syndicates have been shared with relevant law enforcement authorities in Vietnam and Mozambique by a range of stakeholders.
- Request Mozambique to declare its rhino horn stocks to the Secretariat pursuant to paragraph 2 a) of Resolution Conf. 9.14 (Rev. CoP17) as a matter of urgency.

Nigeria

Summary

Nigeria was first directed by SC65 to develop a NIAP in 2014. At CoP18, Nigeria moved from Category C to that of highest concern, Category A, given the rampant illegal trade in and from Nigeria, as well as the country's weak enforcement. In light of the serious situation, SC71 requested Nigeria to revise and update its NIAP. Nigeria's compliance with the NIAP process has been a recurring issue at CITES meetings. Most recently, Nigeria failed to submit a progress report to SC74 in accordance with the NIAP Guidelines, resulting in the Secretariat issuing a recommendation to instigate compliance proceedings under Res Conf. 14.3 (Rev CoP18).

As directed, Nigeria submitted its overdue progress report within 60 days of the conclusion of SC74. Nigeria has made numerous steps to establish frameworks to better tackle its central role in illegal ivory trafficking. This includes the finalisation of the National Strategy on Wildlife and Forest Crime in Nigeria 2022 – 2026 and seeking assistance under the newly established Compliance Assistance Programme. Nigeria has received considerable support from the United Nations Office on Drugs and Crime (UNODC), Africa Nature Investors and EIA in the development of anti-wildlife crime measures.

In light of the steps taken, EIA agrees with the Secretariat's overall rating of "partial progress" for Nigeria though continues to note levels of illegal ivory trade remain exceptionally high. The ETIS

report to CoP19 notes the ongoing alarming role of Nigeria in illegal ivory trade- from 2018 to 2020, Nigeria ranked the second largest of all Parties in terms of total weightout in the illegal trade in ivory, accounting for 29% of the implicated trade volume and including the third largest seized amount ever reported to ETIS. The report further notes that, during the same period, Nigeria made few seizures in country and that the Party has not reported to ETIS since 2016. EIA investigations align with findings by ETIS that Nigeria serves as an export country for large illegal shipments of wildlife moving from Africa to Asia and that these activities are likely facilitated by organized crime groups.

EIA remains concerned that out of twelve reported wildlife seizures in the NIAP between 2018 - 2022, Nigeria's report emphasises seizures made by Customs from 2021 as being the ones subject of investigation and prosecution. Nigeria ought to provide detailed accounts of law enforcement action on *all* the reported wildlife seizures for the period. To make the NIAP Report reliable on this point, the report on law enforcement action should include the charge numbers of prosecuted cases and the courts in which they are being prosecuted. The report is also noticeably silent on measures to improve cooperation and coordination amongst the various enforcement agencies to address IWT, which is also a required action under Nigeria's Article XIII compliance proceedings.

EIA Recommendations to SC75

Adopt Secretariat's recommendation of "partial progress" but encourage Nigeria to expedite progress in particular by:

- Addressing ongoing involvement of organised criminal syndicates in ivory poaching, including through aligning activities with the implementation of the new National Strategy.
- Urge Nigeria to undergo ICCWC Toolkit assessment and to rapidly implement recommendations stemming from the assessment.
- Seek clarity regarding how Nigeria's role in the Compliance Assistance Programme can expedite Nigeria's progress under the NIAP process.
- Urge Parties in West and Central Africa to expedite the development of measures to address wildlife trafficking, including the adoption of the WASCWC by the ECOWAS Parliament, the formal establishment of the West Africa Network to Combat Wildlife Crime (WAN) and the development of National Wildlife Crime Strategies and Wildlife Law Enforcement Task Forces.
- Prioritising anti-corruption measures in NIAP, which is also a requirement under Nigeria's Article XIII compliance proceedings
- Strengthening international cooperation, in particular between Nigeria and Vietnam in light of the persistent illegal trade route between the two countries. This should include urgently signing the MoU between the relevant CITES Management Authorities.
- Implementing swift legislative action to enact the Endangered Species Conservation and Protection Bill 2022.
- Increasing transparency around wildlife seizures and of stockpiles records, including by reporting to ETIS in timely fashion.

South Sudan

Summary

South Sudan is not a Party to CITES. The ETIS report to CoP19 identifies South Sudan as Category C though the Secretariat recommends that South Sudan *not be included* in the NIAP process.

The ETIS report to CoP19 states that the most notable seizure associated with South Sudan occurred in 2019 and consisted of a 3.2 tonne shipment of raw ivory that was seized by Ugandan

officials and was reportedly destined to Vietnam. The report notes that it has been reported that some of the ivory in that seizure bore the markings of tusks that derived from the 83-tonne Burundi government stockpile that was first registered in 1989 and each piece marked by the CITES Secretariat. The report notes that the long route used to move ivory that is believed to have originated in Burundi through the Democratic Republic of the Congo to South Sudan before moving it back to Kampala, suggests that South Sudan may now be serving as transit point in the regional illegal wildlife trade. Worryingly, South Sudan displays high levels of corruption, as evidenced in the Corruption Perceptions Index score, as well as a low "law enforcement ratio".

As a non-Party to CITES, South Sudan has yet to enact critical laws on wildlife conservation and tourism, which would act as legal cornerstones for South Sudan to combat wildlife poaching, illegal wildlife trade, and enhance the protection and monitoring of endangered species including elephants.

EIA recommendations to SC75

- Note that South Sudan is not yet a Party to CITES and encourage South Sudan to accede.
- Agree with the Secretariat's recommendation to not include South Sudan in the NIAP process at this time, as it is unclear if inclusion would result in considerable impact at this point in time, given that South Sudan has yet to enact critical legal frameworks for combating wildlife crime including IWT.
- Encourage South Sudan to develop and implement the necessary legislative frameworks to address, *inter alia*, illegal wildlife trade.
- Encourage South Sudan to undergo an ICCWC Toolkit Assessment as a first step to identify gaps and priority areas for action.
- Encourage South Sudan to report to ETIS on voluntary basis to assist with trend analysis and to assist South Sudan with its future formalisation of NIAP.
- Noting the apparent linkages of Burundi ivory stockpiles and illegal ivory seizures in/related to South Sudan, EIA would encourage Parties to support CoP19 66.2.1 which provides additions to Decisions 18.184 and 18.185 regarding declaration and reporting of stockpiles.

Togo

Summary

Togo first developed a NIAP in 2018 which has not since been updated. The ETIS reports prepared for CoP17 identified Togo as a Category A Party. The ETIS reports prepared for CoP18 and CoP19 no longer identify Togo as a priority Party. Togo did not submit a progress report in time for SC74 and submitted its overdue report within 60 days of the conclusion of SC74.

For SC75, the Secretariat recommends an overall rating of "limited progress", which EIA agrees with. However, a third of the actions contained in Togo's NIAP have not yet been started, for reasons that are unclear. A number of these activities are critical baselines in Togo's fight against ivory trafficking and SC75 should urgently request Togo to commence the following activities in particular, as a matter of urgency:

- Activity 2.2: Strengthen land and sea controls of illegal trade including at airports, ports, border checkpoints, craft markets, jewellery stores, by strengthening abilities of technical and operation departments tasked with tackling wildlife trafficking.
- Activity 2.3: Establish secure store for seized ivory
- Activity 2.6: Establish risk-profiles specific to national level and indicators to tackle wildlife trafficking, in particular ivory trafficking.
- Activity 5.1: Carry out an audit and inventory of seized ivory
- Activity 5.2: Improve seizure reporting to ETIS

EIA recommendations to SC75

- Agree to the Secretariat's rating of "limited progress" and urgently call on Togo to rapidly commence Activities 2.2, 2.3, 2.6, 5.1 and 5.2.
- In the absence of sufficient progress by Togo to commence key activities by SC77, Parties should consider compliance proceedings to expedite progress.
- Urge ECOWAS to adopt the WASCWC and call on Parties to establish the West Africa Network to Combat Wildlife Crime (WAN), as well as development of National Wildlife Crime Strategies and Taskforces.