



# Global Illegal Logging and Associated Trade (ILAT) Risk Data Tool

## Summary of Data and Methodology

March 2020

This document outlines the approach and methodology used by Forest Trends and the Environmental Investigation Agency - US to better understand risk in global timber supply chains, using publicly available trade data and indicators of national governance risk for 211 countries. The Global Illegal Logging and Associated Trade Risk Assessment Tool (ILAT Risk Data Tool), presented in a dedicated Forest Trends' website,<sup>1</sup> has been designed to facilitate the very initial stages of a national risk assessment. Users can access global timber trade data, and the ILAT Risk Data Tool will also help raise flags on the risk of illegal timber entering a supply chain.<sup>2</sup>

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<sup>1</sup> Forest Trends. 2019. "ILAT Risk Homepage." Forest Trends. Available at <https://www.forest-trends.org/fptf-ilat-home/>

<sup>2</sup> Disclaimer: the analysis presented on the ILAT Risk website is by no means comprehensive and is not an absolute assessment of illegal logging risk for a source country. The analysis can therefore only offer an indication of *relative national-level "risk"* (based on corruption, governance, and political and harvest risk) associated with a trading country. This data therefore is intended to offer insight into the initial stages of risk assessment, but should not be used in isolation or as an alternative to seeking out detailed location specific assessments of forest crime. Crimes can still occur in countries rated lower risk, and there can be legal, sustainable, and/or certified timber produced in countries listed as higher risk. All robust due diligence / care systems would need to investigate further.

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## TRADE DATA

To understand global trade relationships and patterns for timber, pulp and paper products, data on imports, exports, re-imports and re-exports<sup>3</sup> was sourced from the United Nations Statistics Divisions' UN Comtrade database — the official repository for international trade statistics.<sup>4</sup> Forest Trends downloaded UN Comtrade data for the period 2012 - 2018 for 33 Harmonized System (HS) Codes under Chapters 48, 44 (4401 - 4421), 47 (4701 - 4705) and 94 (940161, 940169, 940330, 940340, 940350, and 940360). Forest Trends initially downloaded UN Comtrade data in December 2018 and again in July 2019, to capture new data reported for 2018.

In general, and where possible, data reflects the official submission of the reporting country. However, in a number of cases, countries did not report their data to UN Comtrade for one or several years between 2013 and 2018. In these instances, Forest Trends aggregated the relevant data from all other reporting countries for those years (i.e. if Country X failed to report to UN Comtrade in a given year, global imports from Country X replace the missing data for Country X's exports, and global exports to Country X replace the missing data for Country X's imports). This provides an estimate based on best-available global data but is not an official submission. A full list of the countries and years for which this "Trade Flow Switch" methodology was applied is published in Annex III.

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<sup>3</sup> Re-imports are goods imported in the same state as previously exported. Re-exports are exports of foreign goods in the same state as previously imported.

<sup>4</sup> United Nations Statistics Division. 2018. "UN Comtrade." Available at <https://comtrade.un.org/data/>

Trade data can indicate the volume and value of trade in timber, pulp and paper products as well as key relationships and trade routes globally, but does not in and of itself, reveal trade routes for illegal timber.

## RISK PROFILE OF SOURCE COUNTRIES

To indicate potential higher-risk trade routes for illegal timber, we follow a growing body of work in using existing data and metrics related to national governance.<sup>5</sup>

To date, Transparency International's Corruption Perception Index (CPI) has often been used to indicate the relative risk of corruption and links to illegality in a particular country of harvest. The CPI ranks 180 countries by perceived public sector corruption levels.<sup>6</sup> Corruption has been shown to be highly correlated with the failure of a country's public sector to enforce relevant laws or regulate industries effectively.<sup>7</sup> Nearly half of the world's forests are in nations with what Transparency International calls 'rampant' corruption<sup>8</sup> and most of the forest crimes identified by Interpol and UNEP result from the inability of state forest administrations to enforce laws that regulate timber harvesting and trade.<sup>9</sup> The complicity of government officials in corruption in many states undermines the enforcement of laws and regulations relating to forest protection and management, as well as the reliability of chain of custody systems.<sup>10</sup>

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<sup>5</sup> For further discussion see Norman, Marigold, Jade Saunders and Kerstin Canby. 2017. "National Governance Indicators. Relevance for the Regulation of the Trade in Illegal Timber." Forest Trends. Available at [https://www.forest-trends.org/wp-content/uploads/2017/03/FINAL-governance-paper-1132017\\_v3.pdf](https://www.forest-trends.org/wp-content/uploads/2017/03/FINAL-governance-paper-1132017_v3.pdf) [Forest Trends 2017]

<sup>6</sup> Transparency International. 2018. "Corruption Perceptions Index 2018." Transparency International. List for 2018 available at <https://www.transparency.org/cpi2018>

<sup>7</sup> Lawson, Sam and Larry MacFaul. 2010. "Illegal Logging and Related Trade: Indicators of the Global Response." Chatham House. Available at <https://indicators.chathamhouse.org/sites/files/reports/CHillegalloggingpaperwebready1.pdf> [Chatham House 2010]

<sup>8</sup> Sundstrom, Aksel. 2016. "Understanding Illegality and Corruption in Forest Management: A Literature Review." *Working paper series* 2016(1), The Quality of Government Institute (QOG). ISSN: 1653-8919. Available at [https://qog.pol.gu.se/digitalAssets/1558/1558490\\_2016\\_1\\_sundstrom.pdf](https://qog.pol.gu.se/digitalAssets/1558/1558490_2016_1_sundstrom.pdf) [Sundstrom 2016]

<sup>9</sup> Nellemann, C. (Editor in Chief); Henriksen, R., Kreihuber, A., Stewart, D., Kotsovos, M., Raxter, P., Mrema, E., and Barrat, S. (Eds). 2016. "The Rise of Environmental Crime – A Growing Threat To Natural Resources Peace, Development And Security – A UNEP INTERPOL Rapid Response Assessment." United Nations Environment Programme and RHIPTO Rapid Response – Norwegian Center for Global Analyses. ISBN: 978-82-690434-1-9. Available at [https://wedocs.unep.org/bitstream/handle/20.500.11822/7662/-The\\_rise\\_of\\_environmental\\_crime\\_A\\_growing\\_threat\\_to\\_natural\\_resources\\_peace%2C\\_development\\_and\\_security-2016environmental\\_crimes.pdf.pdf?sequence=3&isAllowed=y](https://wedocs.unep.org/bitstream/handle/20.500.11822/7662/-The_rise_of_environmental_crime_A_growing_threat_to_natural_resources_peace%2C_development_and_security-2016environmental_crimes.pdf.pdf?sequence=3&isAllowed=y).

<sup>10</sup> For a summary of the ways in which corruption negatively impacts environmental governance, see Leitao, Alexandra. 2016. "Corruption and the Environment." *Journal of Socialomics* See 5(3). DOI: 10.4172/2167-0358.1000173. Available at <https://www.longdom.org/open-access/corruption-and-the-environment-2471-8726-1000173.pdf>.

For examples of the links between government corruption and illegal logging, see Gore, Meredith L., Jonah Ratsimbazafy and Michelle L. Lute. 2013. "Rethinking Corruption in Conservation Crime: Insights

However, corruption is not a perfect proxy for the risk of illegal wood entering a supply chain (see Disclaimer in Footnote 2); the CPI also only assesses perceptions of corruption and is just one source of data.

Forest Trends therefore sought to look at a broader set of independent indices to understand whether countries are consistently ranked relative to one another. The ILAT Risk Data Tool also draws on three main and inter-related “risk” categories: (a) political governance risk; (b) risk of product association with armed conflict; and (c) risk of export in violation of export bans. These categories, as well as the indicators and data sources are summarized in Table 1 on the following page:

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from Madagascar.” *Conservation Letters* 6(6). DOI: 10.1111/conl.12032. Available at <https://onlinelibrary.wiley.com/doi/epdf/10.1111/conl.12032>.

For a summary of the scope and results of studies on corruption and illegality in forest management see Sundstrom 2016.

**Table 1: Risk Categories, Indicators and Sources**

| Risk Category                         | Rationale and Indicator  | Source   |
|---------------------------------------|--|--|
| 1. Governance and Harvest Risk        | <p>To indicate the potential governance and harvest risk associated with a source country directly trading with an importer.</p> <p><i>Indicators/Data:</i></p> <p>Forest Trends Governance Scores, based on 13 publicly available indicators from sources such as the World Bank, the Economist Intelligence Unit and TRACE International.</p> <p>NEPCon Timber Risk Assessment, in countries which have been assessed.</p> | <p>Forest Trends, 2017,<sup>11</sup> 2019</p> <p>NEPCon Sourcing Hub, 2019<sup>12</sup></p>                                |
| 2. Conflict Risk                      | <p>To indicate the risk that trade could be funding conflict.</p> <p><i>Indicators/Data:</i></p> <p>Source/producer country on World Bank Harmonized List of Fragile Situations.</p>   | <p>World Bank Harmonized List of Fragile Situations, 2020<sup>13</sup></p>   |
| 3. Illegal Forest Product Export Risk | <p>Logs and sawnwood sourced from countries with active regulations restricting the export of these products.</p>  | <p>Compilation of national and subnational laws banning exports of logs and sawnwood, Forest Trends, 2019<sup>14</sup></p> |

<sup>11</sup> Forest Trends 2017.

<sup>12</sup> NEPCon Timber Sourcing Hub. 2019. "Timber Risk Assessment scores." NEPCon. Most recent scores available at: <https://www.nepcon.org/sourcinghub/timber> [NEPCon 2019]

<sup>13</sup> World Bank. 2020. "FY20 List of Fragile and Conflict-affected Situations." World Bank. List for 2020 available at <http://pubdocs.worldbank.org/en/179011582771134576/FCS-FY20.pdf> [World Bank 2020]

<sup>14</sup> Forest Trends. 2019. "Known Forest Product Export Bans, as of September 2019." Forest Trends. Full list available at <https://www.forest-trends.org/known-log-export-bans/>. [Forest Trends 2019]

## Governance and Harvest Risk

The ILAT Risk Score was compiled using a combination of Forest Trends Governance Scores,<sup>15</sup> which provides an average relative governance and corruption ranking for 211 countries globally, and where available, NEPCon's Timber Risk Assessment score,<sup>16</sup> which measures the risk of illegality occurring in 21 areas of law relevant to timber legality.

An average of both the NEPCon and Forest Trends scores has been calculated for 59 countries where both datasets are available. For all other countries, the ILAT Risk Score reflects Forest Trends Governance Scores. Countries scoring less than 25 are categorized as "lower-risk", while countries scoring between 25 and 50 are categorized as "medium-risk". Countries scoring above 50 are categorized as "higher-risk". Further details on the methodology of the Forest Trends and NEPCon scores are detailed below.

### *Forest Trends Governance Scores*

In 2017, Forest Trends compared national-level political, governance, business, economic and corruption indexes to determine their level of consistency in country assessments. These indices draw on a broad range of relevant underlying data from the World Bank, African Development Bank, Asian Development Bank, Inter-American Development Bank, International Fund for Agricultural Development's programming criteria, United Nations and governmental aggregated data, as well as independent surveys and other primary data (Box 2).

#### **Box 2: Indices Incorporated into Forest Trends Governance Scores<sup>17</sup>**

1. Bertelsmann Transformation Index (BTI)
2. Fragile State Index (FSI)
3. Corruption Perceptions Index (CPI)
4. Economist Intelligence Unit operational risk country rankings (EIU)
5. Ibrahim Index of African Governance (IIAG)
6. Heritage Foundation Index of Economic Freedom (IEF)
7. ND Gain Country Readiness Ranking (ND GAIN)
8. Political Risk Index (PRI)
9. TRACE Matrix (TRACE)
10. World Bank Ease of Doing Business (EDB)

<sup>15</sup> These scores have previously been called "National Governance Indicators" and "Forest Trends Average Relative Country Governance Percentile Rank." For details on the methodology underlying these scores, see Forest Trends 2017.

<sup>16</sup> NEPCon 2019.

<sup>17</sup> The 2019 update used the same approach as the initial assessment but also incorporates the Economist Intelligence Unit's Illicit Trade Environment Index for the first time, reflecting the new data now available for 84 countries (The Global Illicit Trade Environment Index 2018).

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|---|
| <ol style="list-style-type: none"><li>11. World Justice Project Rule of Law Index (WJP)</li><li>12. Worldwide Governance Indicators (WGI)</li></ol> |
|---|

Despite diverse underlying data, the results of the comparison show striking consistency in the relative governance score or ranking given to a country. Forest Trends averaged percentile ranks across the indices and then ordered countries from lowest score (suggesting a lower national corruption and governance risk) to highest score (suggesting a higher national corruption and governance risk). Compiling and comparing these indices resulted in the development of a new relative governance ranking for 211 countries, now called the Forest Trends Governance Scores.

In 2019, Forest Trends updated the 2017 assessment of national relative governance scores to capture new data for 2017 and 2018. The full list of 2019 updated Forest Trends Governance Scores is included in Annex II and shows minimal change in the results compared with the original 2017 assessment.<sup>18</sup> The average change was a 0.6% shift for countries ranked on the list. This suggests that not only is there a high degree of consistency in countries' assigned relative scores or rankings across a broad set of credible and independent indices, but that certain countries consistently rank as higher-risk based on governance over time.

### *NEPCon Timber Risk Assessment Scores*

Governance and corruption indicators do not specifically reflect the risk of illegal harvest in a source country. To capture the best available information on illegal harvest risk, this project also uses NEPCon's Timber Risk Assessment scores, which measure the risk of illegality occurring in 21 areas of law relevant to timber legality. NEPCon has completed timber risk assessments for 59 countries globally.<sup>19</sup> NEPCon's scores have been flipped to ensure compatibility with Forest Trend's scoring/ranking system, where higher numbers are associated with greater governance and corruption challenges.

A full list of country ILAT Risk Scores and Risk Profile Categories is published in Annex I.

## Risk and Conflict

A further indicator of risk associated with sourcing illegal timber is the prevalence of armed conflict. Fragile and conflict-affected states face particularly severe development challenges and are characterized by weak institutional capacity, ineffective rule of law, poor governance, political instability, and the threat or reality of on-going, small-scale violence.<sup>20</sup> Armed conflicts

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<sup>18</sup> Forest Trends 2017.

<sup>19</sup> NEPCon 2019.

<sup>20</sup> Woolcock, Michael. 2014. "Engaging with Fragile and Conflict-Affected States." Harvard Kennedy School Faculty Research Working Paper Series. Available at <https://research.hks.harvard.edu/publications/getFile.aspx?Id=1091>

frequently erupt in rural areas, often in forests, which are generally far from centers of government oversight, and provide a context for concealing armed forces. Forests also represent an opportunity to exploit valuable natural resources by cutting and selling timber either locally or internationally, meaning that forests have often been implicated in patterns of conflict in fragile states.<sup>21,22</sup> Therefore, there is a risk that the forestry sector is affected by, and even fueling the outbreak or continuation of violent conflict, undermining national endeavors towards development, good governance, and rule of law.

Even in post-conflict states, ceasefires often fail within a decade and countries can fall back into a “conflict trap” of repeating cycles of violence that undermine both development and good governance as well as natural resource management.<sup>23</sup> This dynamic poses a risk for sourcing timber products from a country currently in conflict or recently emerging, post-conflict. At the same time, supporting well-governed, sustainably managed forests, and a responsible global trade in legal forest products, is an effective way to create rural jobs and the stable economic conditions in which growth and peace can occur.

To categorize “fragile and conflict-affected state” for this analysis, we refer to the World Bank’s annual assessment of fragile and conflict situations, released as the Harmonized List of Fragile Situations.<sup>24</sup> The concept and the list have evolved in line with World Bank’s understanding of the development challenges in countries affected by violence and instability. The list for Financial Year 2020 was used for this assessment recognizing that violence tends to erupt in fragile situations within a ten to twenty-year timeframe. While the list provides a national-level classification, it is important to note that the list belies the reality that conflict is generally a spatially explicit phenomenon. Conflict often occurs in a certain place and that is not necessarily at the country-level. To understand the full complexity of conflict and illegal logging would therefore require a sub-national/spatially explicit analysis, which is currently outside the scope of this analysis. This also means that countries not on the list may experience pockets of regionally or area specific armed conflict, and as such, it is important to consider all potential conflict situations on a case-by-case basis.

While it is possible to buy legal wood in a fragile and conflict-affected state, the political instability, weak governance, and violence inherent to these situations indicates a significant likelihood of buying illegal wood. Responsible buyers must negotiate unclear political mandates, contested laws, weak governance and a lack of state enforcement of laws and regulations

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<sup>21</sup> US Agency for International Development. 2005. “Forests and Corruption: A Toolkit for Intervention.” USAID. Available at [https://pdf.usaid.gov/pdf\\_docs/PNADE290.pdf](https://pdf.usaid.gov/pdf_docs/PNADE290.pdf)

<sup>22</sup> Cheng, Christine and Dominik Zaum. 2016. “Corruption and the Role of Natural Resources in Post-Conflict Transitions.” In *Governance, Natural Resources, and Post-Conflict Peacebuilding*, edited by Carl Bruch, Carroll Muffett, and Sandra S. Nichols. Oxon: Environmental Law Institute and United Nations Environment Programme.

<sup>23</sup> Canby, Kerstin, Arb Blundell and Emily Harwell. 2016. “How REDD+ Can Help Countries Recovering from Armed Conflict.” *Forest Trends*. Available at <https://www.forest-trends.org/blog/how-redd-can-help-countries-recovering-from-armed-conflict/>

<sup>24</sup> World Bank 2020.



relating to forest protection and a significant vulnerability to fraud and forgery in official documents, premised on the likelihood of corruption.<sup>25</sup>

## Illegal Forest Product Export Risk

In addition to national-level risk assessments and value/volumes of trade, a further flag for potential illegality is the presence of active country export bans on specific forest products.

Over the past several decades, more than 55 countries – most in tropical timber-producing areas – have enacted policies to restrict or prohibit the export of certain (often unprocessed) products such as logs and sawnwood.<sup>26</sup> Export restrictions range from comprehensive bans on all raw or crudely processed timber, to more narrow, partial bans targeting certain forest products, specific tree species, or distinct regions of harvest within a given country. In some countries, the wording of the policy may be ambiguous or difficult to interpret, and in some cases, exemptions can be granted by government officials under special circumstances.

The aim of export ban policies, largely known as Forest Product Export Bans (FPEBs), has in many cases been both economic and environmental. Requiring timber to be processed in-country before it is being exported creates jobs and enables higher sale prices (and taxes) for the semi-processed or finished wood products. It is also more difficult for illegal timber harvesters to “cut-and-run” with raw logs stolen from a country’s forests when a log must be transported to a domestic mill, where nearby roads and checkpoints can be more closely monitored. Forest Product Export Bans are also often politically easier to implement than addressing the more difficult issues that may be contributing to illegal logging or the under-development of a country’s domestic timber industry (e.g., corruption, lack of investment). Despite their seeming simplicity, FPEBs are difficult to enforce for various reasons, ranging from the low capacity of government agencies to outright fraud and corruption within one or multiple links along the supply chain.<sup>27</sup> Due in part to these enforcement challenges, products covered under an export ban often continue to be exported from countries, in many cases in violation of these policies.

The analysis of trade statistics represents only a starting point for further investigation of specific imports from countries with FPEBs. Digging deeper into trade flows reveals that the imports either do in fact fall within a window of exemption under the exporting country’s partial policy or are in fact violating the terms of a FPEB. Experience over the past 18 months in analyzing trade data and digging deeper into specific import flows has shown the importance of this additional investigation. The presence of a FPEB signals a need for additional risk assessment and

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<sup>25</sup> Norman, Marigold and Jade Saunders. 2017. “Timber-Sourcing from Fragile and Conflict-Affected States.” Forest Trends. Available at [https://www.forest-trends.org/wp-content/uploads/2017/09/doc\\_5616.pdf](https://www.forest-trends.org/wp-content/uploads/2017/09/doc_5616.pdf)

<sup>26</sup> Forest Trends 2019.

<sup>27</sup> United Nations Office on Drugs and Crime. 2016. “World Wildlife Crime Report, Chapter 3 (Furniture Case Study: Rosewood Logs), Wildlife and the Tropical Hardwood Furniture Trade.” UNODC. Available at [https://www.unodc.org/documents/data-and-analysis/wildlife/WLC16\\_Chapter\\_3.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/WLC16_Chapter_3.pdf)

mitigation actions to ensure that the import of certain products from these countries does not violate the specific laws and regulations of the relevant source countries.

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## ANNEX I - ILAT Risk Score & Risk Profile Categorization

ILAT Risk Scores are based on a) Forest Trends Governance Rankings (2019 Update - see Annex II) and b) NEPCon ratings where available.

Risk Profile Categorizations:

- ILAT Risk Score of 0 - 24.99: Lower Risk
- ILAT Risk Score of 25 - 49.99: Medium Risk
- ILAT Risk Score of 50 - 100: Higher Risk
- Conflict States: Based on the World Bank Harmonized List of Fragile Situations (2020).  
These designations are:
  - High-Intensity Conflict
  - Medium-Intensity Conflict
  - High Institutional and Social Fragility

| Country             | ILAT Risk Score | Risk Categorization |
|---------------------|-----------------|---------------------|
| Afghanistan         | 90.97653091     | Conflict State      |
| Albania             | 41.68971537     | Medium Risk         |
| Algeria             | 76.84567605     | Higher Risk         |
| American Samoa      | 20.37914692     | Lower Risk          |
| Andorra             | 40.8575237      | Medium Risk         |
| Angola              | 87.01560559     | Higher Risk         |
| Anguilla            | 20.85308057     | Lower Risk          |
| Antigua and Barbuda | 36.7754041      | Medium Risk         |
| Argentina           | 63.13170036     | Higher Risk         |
| Armenia             | 48.484983       | Medium Risk         |

| Country            | ILAT Risk Score | Risk Categorization |
|--------------------|-----------------|---------------------|
| Aruba              | 29.80770581     | Medium Risk         |
| Australia          | 4.356984399     | Lower Risk          |
| Austria            | 4.601445411     | Lower Risk          |
| Azerbaijan         | 57.70483628     | Higher Risk         |
| Bahamas            | 33.09115502     | Medium Risk         |
| Bahrain            | 43.88698534     | Medium Risk         |
| Bangladesh         | 79.53722794     | Higher Risk         |
| Barbados           | 32.26642972     | Medium Risk         |
| Belarus            | 33.23789339     | Medium Risk         |
| Belgium            | 8.127777867     | Lower Risk          |
| Belize             | 65.5391274      | Higher Risk         |
| Benin              | 58.34537742     | Higher Risk         |
| Bermuda            | 54.31990521     | Higher Risk         |
| Bhutan             | 31.34399094     | Medium Risk         |
| Bolivia            | 75.96290858     | Higher Risk         |
| Bosnia Herzegovina | 54.17740826     | Higher Risk         |
| Botswana           | 26.36050166     | Medium Risk         |
| Brazil             | 57.01142298     | Higher Risk         |
| Brunei Darussalam  | 31.45553055     | Medium Risk         |
| Bulgaria           | 34.55116861     | Medium Risk         |
| Burkina Faso       | 59.97371382     | Higher Risk         |
| Burundi            | 90.52063468     | Conflict State      |
| Cabo Verde         | 39.47160622     | Medium Risk         |

| Country                     | ILAT Risk Score | Risk Categorization |
|-----------------------------|-----------------|---------------------|
| Cambodia                    | 81.07096602     | Higher Risk         |
| Cameroon                    | 80.85385296     | Higher Risk         |
| Canada                      | 3.059945728     | Lower Risk          |
| Cayman Isds                 | 40.4903458      | Medium Risk         |
| Central African Rep.        | 84.15247037     | Higher Risk         |
| Chad                        | 93.00606156     | Higher Risk         |
| Chile                       | 43.28433387     | Medium Risk         |
| China                       | 40.9561703      | Medium Risk         |
| Colombia                    | 64.04120434     | Higher Risk         |
| Comoros                     | 77.23391705     | Conflict State      |
| Congo                       | 86.61039715     | Conflict State      |
| Costa Rica                  | 28.17723315     | Medium Risk         |
| Côte d'Ivoire               | 77.65045528     | Conflict State      |
| Croatia                     | 31.25171735     | Medium Risk         |
| Cuba                        | 66.83078366     | Higher Risk         |
| Cyprus                      | 25.97556146     | Medium Risk         |
| Czech Republic              | 7.97762033      | Lower Risk          |
| Dem. People's Rep. of Korea | 95.32161911     | Higher Risk         |
| Dem. Rep. of the Congo      | 93.79528552     | Conflict State      |
| Denmark                     | 2.735468939     | Lower Risk          |
| Djibouti                    | 79.69776436     | Conflict State      |
| Dominica                    | 32.87144106     | Medium Risk         |
| Dominican Rep.              | 57.87129757     | Higher Risk         |

| Country           | ILAT Risk Score | Risk Categorization |
|-------------------|-----------------|---------------------|
| Ecuador           | 80.74121791     | Higher Risk         |
| Egypt             | 76.76714992     | Higher Risk         |
| El Salvador       | 50.09108094     | Higher Risk         |
| Equatorial Guinea | 90.01505463     | Higher Risk         |
| Eritrea           | 95.05232465     | Conflict State      |
| Estonia           | 5.737645483     | Lower Risk          |
| Ethiopia          | 82.20053632     | Higher Risk         |
| Fiji              | 47.78333863     | Medium Risk         |
| Finland           | 2.481021866     | Lower Risk          |
| France            | 9.605153439     | Lower Risk          |
| French Guiana     | 19.24960506     | Lower Risk          |
| Gabon             | 84.26313376     | Higher Risk         |
| Gambia            | 73.66642675     | Conflict State      |
| Georgia           | 26.17533327     | Medium Risk         |
| Germany           | 4.565391464     | Lower Risk          |
| Ghana             | 55.93351069     | Higher Risk         |
| Greece            | 43.15421045     | Medium Risk         |
| Greenland         | 7.680358083     | Lower Risk          |
| Grenada           | 37.94721928     | Medium Risk         |
| Guam              | 25.11848341     | Medium Risk         |
| Guatemala         | 73.47858179     | Higher Risk         |
| Guinea            | 80.3573579      | Higher Risk         |
| Guinea-Bissau     | 88.47696603     | Conflict State      |

| Country                 | ILAT Risk Score | Risk Categorization |
|-------------------------|-----------------|---------------------|
| Guyana                  | 59.54254483     | Higher Risk         |
| Haiti                   | 86.24866541     | Conflict State      |
| Honduras                | 84.18281782     | Higher Risk         |
| Hong Kong               | 6.827888095     | Lower Risk          |
| Hungary                 | 37.01566116     | Medium Risk         |
| Iceland                 | 7.122497163     | Lower Risk          |
| India                   | 65.37489242     | Higher Risk         |
| Indonesia               | 51.51187134     | Higher Risk         |
| Iran                    | 79.74454296     | Higher Risk         |
| Iraq                    | 90.35000726     | Conflict State      |
| Ireland                 | 5.781201746     | Lower Risk          |
| Israel                  | 26.04606869     | Medium Risk         |
| Italy                   | 38.3364057      | Medium Risk         |
| Jamaica                 | 39.44213053     | Medium Risk         |
| Japan                   | 6.520982251     | Lower Risk          |
| Jersey, Channel Islands | 9.952606635     | Lower Risk          |
| Jordan                  | 43.66797888     | Medium Risk         |
| Kazakhstan              | 53.41030019     | Higher Risk         |
| Kenya                   | 70.16078974     | Higher Risk         |
| Kiribati                | 63.94882764     | Conflict State      |
| Kosovo                  | 43.38033485     | Medium Risk         |
| Kuwait                  | 46.06131422     | Medium Risk         |
| Kyrgyzstan              | 66.51673744     | Higher Risk         |

| Country         | ILAT Risk Score | Risk Categorization |
|-----------------|-----------------|---------------------|
| Laos            | 88.53903491     | Higher Risk         |
| Latvia          | 15.34909673     | Lower Risk          |
| Lebanon         | 76.76856276     | Conflict State      |
| Lesotho         | 61.48493701     | Higher Risk         |
| Liberia         | 76.55472854     | Conflict State      |
| Libya           | 96.58992626     | Conflict State      |
| Liechtenstein   | 7.762531266     | Lower Risk          |
| Lithuania       | 12.26341463     | Lower Risk          |
| Luxembourg      | 9.157278266     | Lower Risk          |
| Macao           | 36.55878094     | Medium Risk         |
| North Macedonia | 38.69184943     | Medium Risk         |
| Madagascar      | 76.17161901     | Higher Risk         |
| Malawi          | 66.0213212      | Higher Risk         |
| Malaysia        | 32.77396839     | Medium Risk         |
| Maldives        | 64.00248909     | Higher Risk         |
| Mali            | 71.15676399     | Conflict State      |
| Malta           | 21.72887453     | Lower Risk          |
| Marshall Isds   | 51.96527994     | Conflict State      |
| Martinique      | 14.69194313     | Lower Risk          |
| Mauritania      | 75.27804822     | Higher Risk         |
| Mauritius       | 19.61919847     | Lower Risk          |
| Mexico          | 68.09008945     | Higher Risk         |
| FS Micronesia   | 55.33922111     | Conflict State      |

| Country          | ILAT Risk Score | Risk Categorization |
|------------------|-----------------|---------------------|
| Moldova          | 56.56808575     | Higher Risk         |
| Monaco           | 12.11960242     | Lower Risk          |
| Mongolia         | 44.01579993     | Medium Risk         |
| Montenegro       | 37.96157394     | Medium Risk         |
| Morocco          | 55.89293748     | Higher Risk         |
| Mozambique       | 79.46118399     | Conflict State      |
| Myanmar          | 91.46150904     | Conflict State      |
| Namibia          | 41.2694215      | Medium Risk         |
| Nauru            | 58.43330371     | Higher Risk         |
| Nepal            | 67.2679201      | Higher Risk         |
| Netherlands      | 7.981386886     | Lower Risk          |
| New Zealand      | 1.582630798     | Lower Risk          |
| Nicaragua        | 71.11523514     | Higher Risk         |
| Niger            | 70.94993568     | Higher Risk         |
| Nigeria          | 80.45908403     | Higher Risk         |
| Norway           | 1.82273392      | Lower Risk          |
| Oman             | 38.89200982     | Medium Risk         |
| Pakistan         | 82.83940397     | Higher Risk         |
| Palau            | 46.51617844     | Medium Risk         |
| Panama           | 40.95285516     | Medium Risk         |
| Papua New Guinea | 81.84558807     | Conflict State      |
| Paraguay         | 54.95256994     | Higher Risk         |
| Peru             | 65.29353056     | Higher Risk         |



| Country                          | ILAT Risk Score | Risk Categorization |
|----------------------------------|-----------------|---------------------|
| Philippines                      | 60.94328831     | Higher Risk         |
| Poland                           | 15.73848724     | Lower Risk          |
| Portugal                         | 15.30834987     | Lower Risk          |
| Puerto Rico                      | 40.54993625     | Medium Risk         |
| Qatar                            | 26.86694352     | Medium Risk         |
| Rep. of Korea                    | 14.9278513      | Lower Risk          |
| Reunion                          | 21.80094787     | Lower Risk          |
| Romania                          | 49.38442732     | Medium Risk         |
| Russia                           | 80.70062007     | Higher Risk         |
| Rwanda                           | 40.2466132      | Medium Risk         |
| Saint Kitts and Nevis            | 35.27321916     | Medium Risk         |
| Saint Lucia                      | 29.95804201     | Medium Risk         |
| Saint Vincent and the Grenadines | 33.8523472      | Medium Risk         |
| Samoa                            | 35.7813841      | Medium Risk         |
| San Marino                       | 24.16634447     | Lower Risk          |
| Sao Tome and Principe            | 61.83217119     | Higher Risk         |
| Saudi Arabia                     | 47.84521377     | Medium Risk         |
| Senegal                          | 49.0722729      | Medium Risk         |
| Serbia                           | 43.93001517     | Medium Risk         |
| Seychelles                       | 35.7940643      | Medium Risk         |
| Sierra Leone                     | 75.19792549     | Higher Risk         |
| Singapore                        | 8.280160662     | Lower Risk          |
| Slovakia                         | 17.9306449      | Lower Risk          |

| Country             | ILAT Risk Score | Risk Categorization |
|---------------------|-----------------|---------------------|
| Slovenia            | 19.03901875     | Lower Risk          |
| Solomon Isds        | 69.06012962     | Conflict State      |
| Somalia             | 98.97274403     | Conflict State      |
| South Africa        | 21.25151751     | Lower Risk          |
| South Sudan         | 97.90380224     | Conflict State      |
| Spain               | 18.05274039     | Lower Risk          |
| Sri Lanka           | 54.55463856     | Higher Risk         |
| Sudan               | 93.85873961     | Conflict State      |
| Suriname            | 60.98955967     | Higher Risk         |
| Swaziland           | 48.58999389     | Medium Risk         |
| Sweden              | 2.29609081      | Lower Risk          |
| Switzerland         | 2.474339737     | Lower Risk          |
| Syria               | 96.525601       | Conflict State      |
| Taiwan              | 12.90440898     | Lower Risk          |
| Tajikistan          | 80.38459792     | Higher Risk         |
| Tanzania            | 64.61253841     | Higher Risk         |
| Thailand            | 60.22993589     | Higher Risk         |
| Timor-Leste         | 78.48286469     | Conflict State      |
| Togo                | 71.98659929     | Conflict State      |
| Tonga               | 40.66241131     | Medium Risk         |
| Trinidad and Tobago | 48.4754141      | Medium Risk         |
| Tunisia             | 52.40407488     | Higher Risk         |
| Turkey              | 56.31267847     | Higher Risk         |

| <b>Country</b>        | <b>ILAT Risk Score</b> | <b>Risk Categorization</b> |
|-----------------------|------------------------|----------------------------|
| Turkmenistan          | 88.79657324            | Higher Risk                |
| Tuvalu                | 51.71458662            | Conflict State             |
| Uganda                | 68.99875897            | Higher Risk                |
| Ukraine               | 69.12434236            | Higher Risk                |
| United Arab Emirates  | 20.21872796            | Lower Risk                 |
| United Kingdom        | 4.225553251            | Lower Risk                 |
| Uruguay               | 23.2300954             | Lower Risk                 |
| USA                   | 8.830692512            | Lower Risk                 |
| Uzbekistan            | 80.22981837            | Higher Risk                |
| Vanuatu               | 39.55262147            | Medium Risk                |
| Venezuela             | 95.69489917            | Higher Risk                |
| Viet Nam              | 64.49662522            | Higher Risk                |
| Virgin Islands (U.S.) | 22.27488152            | Lower Risk                 |
| West Bank and Gaza    | 63.41232227            | Higher Risk                |
| Yemen                 | 96.40651477            | Conflict State             |
| Zambia                | 62.50908919            | Higher Risk                |
| Zimbabwe              | 92.42934262            | Conflict State             |

## ANNEX II - Forest Trends Governance Scores (2019 Update)

| Country        | FT Governance Score 2019 |
|----------------|--------------------------|
| New Zealand    | 3.17                     |
| Norway         | 3.65                     |
| Sweden         | 4.59                     |
| Switzerland    | 4.95                     |
| Finland        | 4.96                     |
| Denmark        | 5.47                     |
| Canada         | 6.12                     |
| Australia      | 6.71                     |
| Hong Kong      | 6.83                     |
| Iceland        | 7.12                     |
| Greenland      | 7.68                     |
| Liechtenstein  | 7.76                     |
| Netherlands    | 7.98                     |
| Singapore      | 8.28                     |
| United Kingdom | 8.45                     |
| Germany        | 9.13                     |
| Luxembourg     | 9.16                     |
| Austria        | 9.20                     |

| Country              | FT Governance Score 2019 |
|----------------------|--------------------------|
| Jersey, Channel Isds | 9.95                     |
| USA                  | 10.66                    |
| Estonia              | 11.48                    |
| Ireland              | 11.56                    |
| Monaco               | 12.12                    |
| Taiwan               | 12.90                    |
| Japan                | 13.04                    |
| Martinique           | 14.69                    |
| Czech Republic       | 15.96                    |
| Belgium              | 16.26                    |
| Lithuania            | 16.53                    |
| Chile                | 17.57                    |
| Rep. of Korea        | 17.86                    |
| Slovenia             | 19.04                    |
| France               | 19.21                    |
| French Guiana        | 19.25                    |
| Mauritius            | 19.62                    |
| Latvia               | 19.70                    |
| United Arab Emirates | 20.22                    |
| American Samoa       | 20.38                    |
| Anguilla             | 20.85                    |

| Country           | FT Governance Score 2019 |
|-------------------|--------------------------|
| Portugal          | 21.62                    |
| Malta             | 21.73                    |
| Reunion           | 21.80                    |
| Virgin Isds (US)  | 22.27                    |
| Poland            | 22.48                    |
| Spain             | 23.11                    |
| Uruguay           | 23.23                    |
| Slovakia          | 23.86                    |
| San Marino        | 24.17                    |
| Guam              | 25.12                    |
| Cyprus            | 25.98                    |
| Israel            | 26.05                    |
| Georgia           | 26.35                    |
| Botswana          | 26.36                    |
| Qatar             | 26.87                    |
| Costa Rica        | 28.18                    |
| Aruba             | 29.81                    |
| Saint Lucia       | 29.96                    |
| Croatia           | 31.25                    |
| Bhutan            | 31.34                    |
| Brunei Darussalam | 31.46                    |

| Country                          | FT Governance Score 2019 |
|----------------------------------|--------------------------|
| Barbados                         | 32.27                    |
| Italy                            | 32.67                    |
| Malaysia                         | 32.77                    |
| Dominica                         | 32.87                    |
| Bahamas                          | 33.09                    |
| Saint Vincent and the Grenadines | 33.85                    |
| Bulgaria                         | 34.55                    |
| Saint Kitts and Nevis            | 35.27                    |
| Samoa                            | 35.78                    |
| Seychelles                       | 35.79                    |
| Macao                            | 36.56                    |
| Antigua and Barbuda              | 36.78                    |
| Hungary                          | 37.02                    |
| Romania                          | 37.77                    |
| Grenada                          | 37.95                    |
| Montenegro                       | 37.96                    |
| North Macedonia                  | 38.69                    |
| Oman                             | 38.89                    |
| Jamaica                          | 39.44                    |
| Cabo Verde                       | 39.47                    |
| Vanuatu                          | 39.55                    |

| Country      | FT Governance Score 2019 |
|--------------|--------------------------|
| Rwanda       | 40.25                    |
| Cayman Isds  | 40.49                    |
| Puerto Rico  | 40.55                    |
| Tonga        | 40.66                    |
| Andorra      | 40.86                    |
| Panama       | 40.95                    |
| Namibia      | 41.27                    |
| Albania      | 41.69                    |
| South Africa | 42.50                    |
| Peru         | 42.59                    |
| Colombia     | 43.08                    |
| Greece       | 43.15                    |
| Kosovo       | 43.38                    |
| Jordan       | 43.67                    |
| Bahrain      | 43.89                    |
| Serbia       | 43.93                    |
| Mongolia     | 44.02                    |
| Kuwait       | 46.06                    |
| Palau        | 46.52                    |
| Ghana        | 46.87                    |
| Fiji         | 47.78                    |



| Country             | FT Governance Score 2019 |
|---------------------|--------------------------|
| Saudi Arabia        | 47.85                    |
| Thailand            | 48.46                    |
| Trinidad and Tobago | 48.48                    |
| Armenia             | 48.48                    |
| Senegal             | 49.07                    |
| El Salvador         | 50.09                    |
| Argentina           | 51.26                    |
| Indonesia           | 51.51                    |
| Tuvalu              | 51.71                    |
| India               | 51.75                    |
| Marshall Isds       | 51.97                    |
| Tunisia             | 52.40                    |
| Mexico              | 53.18                    |
| Kazakhstan          | 53.41                    |
| Bosnia Herzegovina  | 54.18                    |
| Bermuda             | 54.32                    |
| Sri Lanka           | 54.55                    |
| China               | 54.91                    |
| Paraguay            | 54.95                    |
| FS Micronesia       | 55.34                    |
| Turkey              | 55.63                    |

| Country               | FT Governance Score 2019 |
|-----------------------|--------------------------|
| Morocco               | 55.89                    |
| Brazil                | 56.02                    |
| Moldova               | 56.57                    |
| Azerbaijan            | 57.70                    |
| Dominican Rep.        | 57.87                    |
| Benin                 | 58.35                    |
| Nauru                 | 58.43                    |
| Solomon Isds          | 59.12                    |
| Guyana                | 59.54                    |
| Burkina Faso          | 59.97                    |
| Viet Nam              | 59.99                    |
| Belarus               | 60.48                    |
| Philippines           | 60.94                    |
| Suriname              | 60.99                    |
| Lesotho               | 61.48                    |
| Sao Tome and Principe | 61.83                    |
| Zambia                | 62.51                    |
| State of Palestine    | 63.41                    |
| Kiribati              | 63.95                    |
| Maldives              | 64.00                    |
| Côte d'Ivoire         | 64.30                    |

| Country          | FT Governance Score 2019 |
|------------------|--------------------------|
| Tanzania         | 64.61                    |
| Guatemala        | 64.96                    |
| Belize           | 65.54                    |
| Malawi           | 66.02                    |
| Kyrgyzstan       | 66.52                    |
| Papua New Guinea | 66.69                    |
| Cuba             | 66.83                    |
| Swaziland        | 67.18                    |
| Nepal            | 67.27                    |
| Russia           | 67.40                    |
| Honduras         | 68.37                    |
| Gabon            | 68.53                    |
| Uganda           | 69.00                    |
| Ukraine          | 69.12                    |
| Ecuador          | 69.48                    |
| Kenya            | 70.16                    |
| Niger            | 70.95                    |
| Nicaragua        | 71.12                    |
| Mali             | 71.16                    |
| Bolivia          | 71.93                    |
| Togo             | 71.99                    |

| Country      | FT Governance Score 2019 |
|--------------|--------------------------|
| Gambia       | 73.67                    |
| Liberia      | 75.11                    |
| Sierra Leone | 75.20                    |
| Mauritania   | 75.28                    |
| Madagascar   | 76.17                    |
| Egypt        | 76.77                    |
| Lebanon      | 76.77                    |
| Algeria      | 76.85                    |
| Laos         | 77.08                    |
| Comoros      | 77.23                    |
| East Timor   | 78.48                    |
| Mozambique   | 79.46                    |
| Bangladesh   | 79.54                    |
| Djibouti     | 79.70                    |
| Iran         | 79.74                    |
| Uzbekistan   | 80.23                    |
| Guinea       | 80.36                    |
| Tajikistan   | 80.38                    |
| Nigeria      | 80.46                    |
| Cambodia     | 81.07                    |
| Ethiopia     | 82.20                    |

| Country                     | FT Governance Score 2019 |
|-----------------------------|--------------------------|
| Pakistan                    | 82.84                    |
| Myanmar                     | 82.92                    |
| Cameroon                    | 83.71                    |
| Haiti                       | 86.25                    |
| Congo                       | 86.61                    |
| Angola                      | 87.02                    |
| Guinea-Bissau               | 88.48                    |
| Turkmenistan                | 88.80                    |
| Equatorial Guinea           | 90.02                    |
| Central African Rep.        | 90.30                    |
| Iraq                        | 90.35                    |
| Burundi                     | 90.52                    |
| Afghanistan                 | 90.98                    |
| Zimbabwe                    | 92.43                    |
| Chad                        | 93.01                    |
| Dem. Rep. of the Congo      | 93.80                    |
| Sudan                       | 93.86                    |
| Eritrea                     | 95.05                    |
| Dem. People's Rep. of Korea | 95.32                    |
| Venezuela                   | 95.69                    |
| Yemen                       | 96.51                    |

| Country     | FT Governance Score 2019 |
|-------------|--------------------------|
| Syria       | 96.53                    |
| Libya       | 96.59                    |
| South Sudan | 97.90                    |
| Somalia     | 98.97                    |

## ANNEX III - Nonreporting Countries & Missing UN Comtrade Data (2013 - 2018)

In a number of cases, countries did not report their data to UN Comtrade for one or several years between 2013 and 2018. In these instances listed below, Forest Trends aggregated the relevant data from all other reporting countries for those years (i.e. if Country X failed to report to UN Comtrade in a given year, global imports from Country X replace the missing data for Country X's exports, and global exports to Country X replace the missing data for Country X's imports). This provides an estimate based on best-available global data but is not an official submission.

| Country     | Years of Missing Comtrade Data |
|-------------|--------------------------------|
| Afghanistan | 2013 - 2017                    |
| Algeria     | 2018                           |
| Andorra     | 2015 - 2017                    |
| Angola      | 2016 - 2018                    |
| Bahamas     | 2016 - 2018                    |
| Bahrain     | 2017, 2018                     |
| Bangladesh  | 2014, 2016 - 2018              |
| Benin       | 2017, 2018                     |

| Country                     | Years of Missing Comtrade Data |
|-----------------------------|--------------------------------|
| Bhutan                      | 2013 - 2018                    |
| Br. Virgin Isds             | 2013 - 2018                    |
| Burkina Faso                | 2017, 2018                     |
| Burundi                     | 2018                           |
| Cambodia                    | 2017, 2018                     |
| Cameroon                    | 2018                           |
| Cayman Isds                 | 2014, 2016 - 2018              |
| Central African Rep.        | 2017, 2018                     |
| Chad                        | 2013 - 2018                    |
| China                       | 2018                           |
| Comoros                     | 2014 - 2018                    |
| Congo                       | 2015, 2016, 2018               |
| Costa Rica                  | 2017, 2018                     |
| Côte d'Ivoire               | 2016 - 2018                    |
| Cuba                        | 2013 - 2018                    |
| Curacao                     | 2013 - 2018                    |
| Dem. People's Rep. of Korea | 2013 - 2018                    |
| Dem. Rep. of the Congo      | 2013 - 2018                    |
| Djibouti                    | 2013 - 2018                    |
| Dominica                    | 2013 - 2018                    |
| Dominican Rep.              | 2018                           |
| Equatorial Guinea           | 2013 - 2018                    |
| Eritrea                     | 2013 - 2018                    |
| Ethiopia                    | 2017, 2018                     |
| Faeroe Isds                 | 2018                           |

| Country          | Years of Missing Comtrade Data |
|------------------|--------------------------------|
| French Polynesia | 2016 - 2018                    |
| FS Micronesia    | 2014 - 2018                    |
| Gabon            | 2013 - 2018                    |
| Gambia           | 2015, 2017, 2018               |
| Ghana            | 2014, 2015                     |
| Gibraltar        | 2013 - 2018                    |
| Greenland        | 2017, 2018                     |
| Grenada          | 2013 - 2018                    |
| Guatemala        | 2017, 2018                     |
| Guinea           | 2016 - 2018                    |
| Guinea-Bissau    | 2013 - 2018                    |
| Haiti            | 2013 - 2018                    |
| Honduras         | 2013, 2018                     |
| Iran             | 2013 - 2018                    |
| Iraq             | 2013, 2015 - 2018              |
| Jamaica          | 2018                           |
| Jordan           | 2018                           |
| Kenya            | 2014 - 2016                    |
| Kiribati         | 2017, 2018                     |
| Kyrgyzstan       | 2014                           |
| Laos             | 2017, 2018                     |
| Lebanon          | 2015, 2017, 2018               |
| Lesotho          | 2013 - 2018                    |
| Liberia          | 2013 - 2018                    |
| Libya            | 2013 - 2018                    |



| Country               | Years of Missing Comtrade Data |
|-----------------------|--------------------------------|
| Macao                 | 2013, 2017, 2018               |
| Madagascar            | 2018                           |
| Malawi                | 2016 - 2018                    |
| Maldives              | 2017                           |
| Mali                  | 2013 - 2015, 2018              |
| Malta                 | 2017                           |
| Marshall Isds         | 2013 - 2018                    |
| Mauritania            | 2015, 2018                     |
| Mongolia              | 2017                           |
| Morocco               | 2017, 2018                     |
| N. Mariana Isds       | 2013 - 2018                    |
| New Caledonia         | 2016 - 2018                    |
| Niger                 | 2017, 2018                     |
| Nigeria               | 2015                           |
| Oman                  | 2018                           |
| Palestine             | 2013 - 2018                    |
| Panama                | 2017, 2018                     |
| Papua New Guinea      | 2013 - 2018                    |
| Qatar                 | 2017                           |
| Rwanda                | 2017, 2018                     |
| Saint Kitts and Nevis | 2018                           |
| Saint Lucia           | 2017, 2018                     |
| Saint Maarten         | 2013 - 2018                    |
| San Marino            | 2013 - 2018                    |
| Saudi Arabia          | 2017                           |

| Country               | Years of Missing Comtrade Data |
|-----------------------|--------------------------------|
| Sierra Leone          | 2013, 2018                     |
| Somalia               | 2013 - 2018                    |
| South Sudan           | 2013 - 2018                    |
| Sudan                 | 2013, 2014, 2016, 2018         |
| Suriname              | 2015                           |
| Swaziland             | 2013 - 2018                    |
| Syria                 | 2013 - 2018                    |
| Tajikistan            | 2013 - 2018                    |
| Thailand              | 2017                           |
| Timor-Leste           | 2014 - 2016, 2018              |
| Togo                  | 2018                           |
| Tonga                 | 2015 - 2018                    |
| Trinidad and Tobago   | 2016 - 2018                    |
| Tunisia               | 2018                           |
| Turkmenistan          | 2013 - 2018                    |
| Turks and Caicos Isds | 2013 - 2018                    |
| Tuvalu                | 2013 - 2018                    |
| U.S. Virgin Isds      | 2013 - 2018                    |
| United Arab Emirates  | 2017, 2018                     |
| Uzbekistan            | 2013 - 2018                    |
| Vanuatu               | 2013 - 2018                    |
| Venezuela             | 2014 - 2018                    |
| Viet Nam              | 2017, 2018                     |
| Yemen                 | 2016 - 2018                    |
| Zambia                | 2016                           |

| Country  | Years of Missing Comtrade Data |
|----------|--------------------------------|
| Zimbabwe | 2017                           |