

## Elephant Trade Information System (ETIS) Report: Overview of seizure data and progress on requests from the 69<sup>th</sup> and 70<sup>th</sup> meetings of the Standing Committee (SC69 and SC70)

September 2020

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**TRAFFIC**  
the wildlife trade monitoring network



1. This report was prepared by TRAFFIC.

#### *Background*

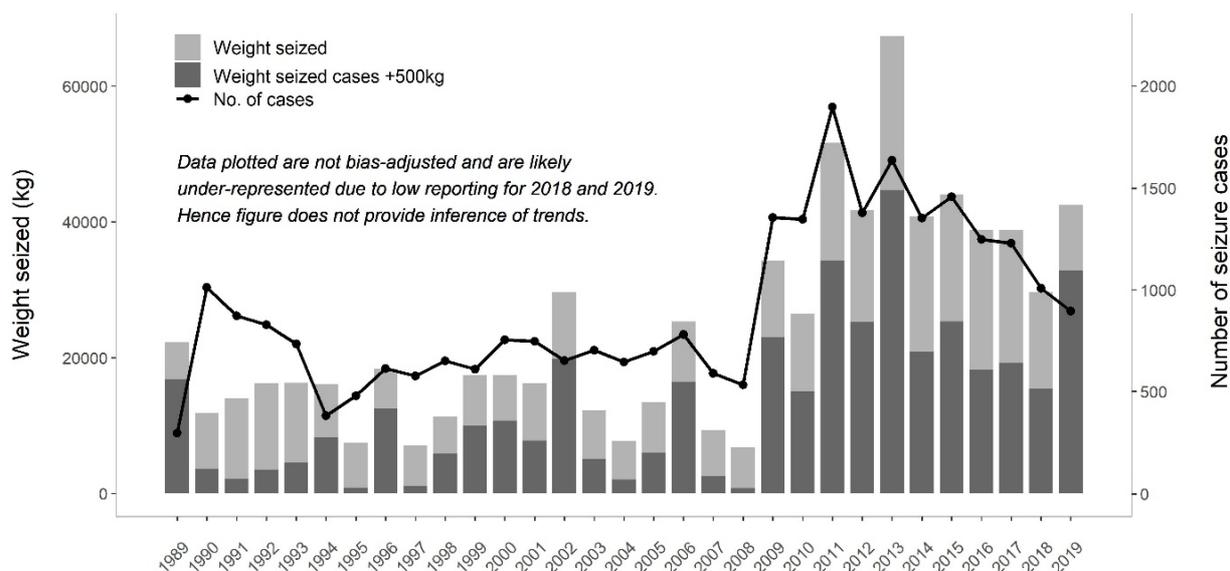
2. The Elephant Trade Information System, commonly known as ETIS, was established by the Conference of the Parties (CoP) to CITES at its 10th Meeting (Harare, 1997), and is conducted in accordance with the provisions in Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens*.
3. ETIS is a comprehensive and global information system whose central feature is a database holding the details of law enforcement records for seizures or confiscations of elephant ivory and other elephant specimens which have been reported to occur since 1989. ETIS also maintains a series of subsidiary information on law enforcement effort and efficiency, rates of reporting, governance issues, background economic data and other factors.
4. ETIS is managed and coordinated by TRAFFIC in consultation with the MIKE-ETIS Technical Advisory Group (TAG) and in collaboration with the CITES Secretariat. TRAFFIC secures the funding to operate ETIS, partially from the CITES Secretariat, which provides support through European Union (EU) funding.

#### *Overview of seizure data*

5. By the closing date of 8 July 2020, datasets for both 2018 and 2019 were not received from some key Parties<sup>1</sup> (see paragraphs 8-11). This inhibited the ability of ETIS to conduct trend analyses in illegal ivory trade, and upon consultation with the MIKE-ETIS Technical Advisory Group (TAG) on 2 July 2020, it was decided to further pursue missing data before estimating trends for 2018-2019. Consequently, only non bias-adjusted data summaries are described in this report.
6. As of 8 July 2020, there were 30,736 records in ETIS from 1989-2019, of which 27,961 represented ivory seizures (Figure 1), whilst the remainder comprises non-ivory elephant products. In cases where only the number of pieces, rather than the weight, of the seizure were provided in the raw data, weights were estimated from the number of pieces by using methodologies from Milliken et al. 2018 and Underwood et al. 2013. TRAFFIC cautions that Figure 1 should not be interpreted as a trend, nor is it suggestive of absolute quantities of ivory seized over time, because of inherent bias in the seizure data submitted owing to variable rates of making and reporting seizures to ETIS between and within countries over time.
7. The number of ivory seizure cases reported to ETIS for 2018 (1,007 total records) and 2019 (895 total records), respectively represent 18% and 27% fewer records compared to 2017 (**Annex 1**). The main reason is likely that a few key countries had not submitted data in time for this analysis; of the 45 countries that have submitted data continuously for the previous five years from 2013-2017, 23 (51%) had not submitted 2018, 2019, or both years' data by the close date of the analyses (July 8, 2020). Collectively, these 23 Parties accounted on average for 17% of the transactions and over 35% of the total seizure weight in the past five-year period (2013-2017). Furthermore, none of the five Parties identified as Category A, or most affected by the illegal trade in ivory, for the NIAP process had submitted data for both 2018 and 2019; one Party submitted data only for 2019 while the other four did not submit any reports for either year. Of the 15 Parties identified as Category C, or affected by the illegal trade in ivory, two had submitted partial data for 2018 or 2019, and two did not submit any reports (the other 11 submitted both years' data).

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<sup>1</sup> Key Parties are defined in paragraph 6 as Parties that submitted data continuously for the previous five years from 2013-2017 and/or Parties that are identified as Category A, B or C for the National Ivory Action Plan (NIAP) process (although may not be participating in that process; <https://www.cites.org/eng/niaps>).

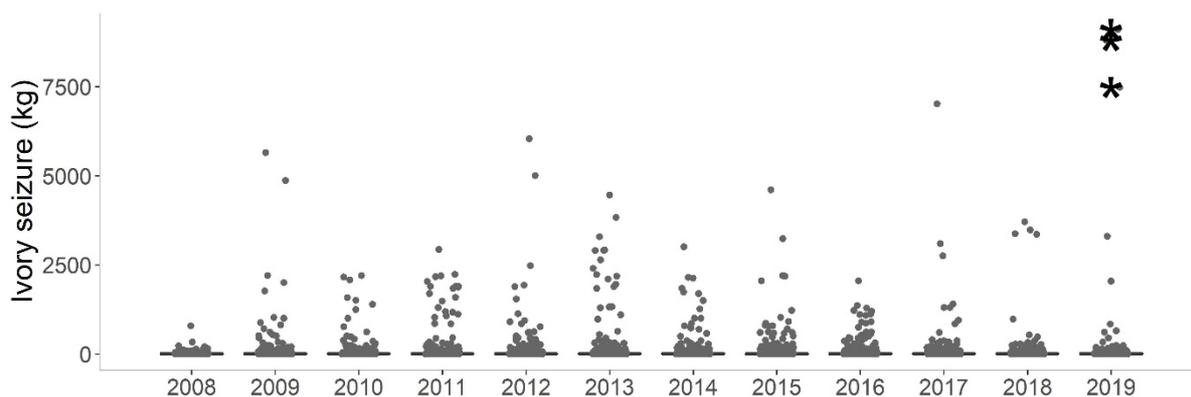


**Figure 1: Number of ivory seizure cases and weight seized by year from 1989 - 2019.** Summaries are based on data submitted up to 8 July 2020 that were ETIS validated. Weight seized indicates actual reported raw ivory weights, adjusted reported worked seizure weights by the raw ivory equivalent (RIE) conversion factor, or estimated weights for raw or worked seizures that reported the number of pieces but had missing weights (based on procedures described in Milliken et al. 2018 and Underwood et al. 2013).

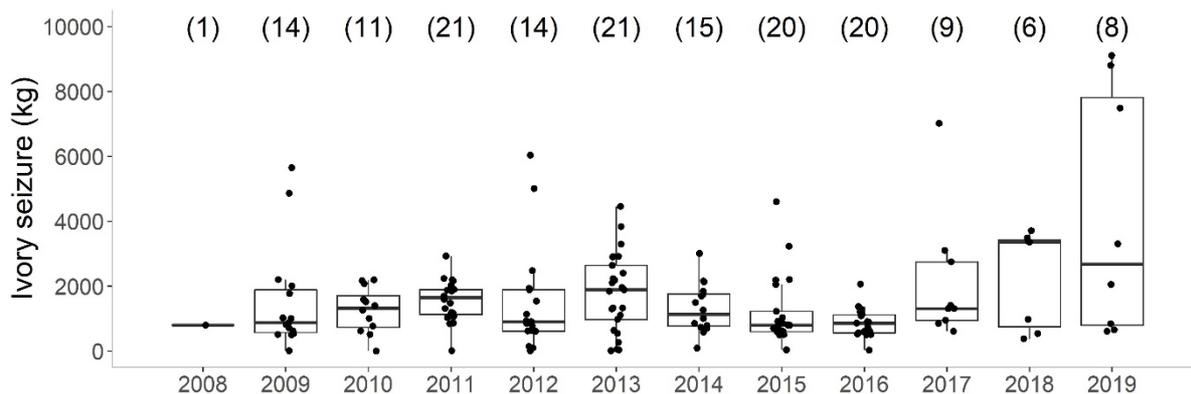
8. Table 1 provides the estimated total weight of the seizures represented by the data included in **Annex 1**. Even though numbers of reported ivory seizure cases was lower for 2018 and 2019 and may be under-represented given the data reporting limitations referred to above, the estimated 42,479 kg of ivory seized in 2019 represents the fourth largest tally from 1989-2019, and already represents a 9% increase from the quantity seized in 2017. There were three exceptionally large seizures made in 2019 that were the largest ever recorded in ETIS (Figure 2). They all consisted of raw ivory totalling 7,482 kg for a seizure in China, 8,795 kg for a seizure in Singapore, and 9,104 kg for a seizure in Viet Nam. However, despite the record weight for seizures in 2019, overall fewer cases of large seizures greater than 500 kg were reported in 2018 (6 cases) and 2019 (8 cases), or less than half of the highest number (20 cases) of large seizures recorded from 2008-2019 (Figure 3).

**Table 1: Total number and weight of ivory seizure cases reported to ETIS from 2008 – 2019.** Summaries are based on data submitted up to 8 July 2020 that were ETIS validated. Weight indicates actual reported raw ivory weights, adjusted reported worked seizure weights by the raw ivory equivalent (RIE) conversion factor, and estimated weights for raw or worked seizures that reported the number of pieces but had missing weights (based on procedures described in Milliken et al. 2018 and Underwood et al. 2013).

Seizures	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b>Number</b>	534	1,355	1,346	1,898	1,378	1,636	1,352	1,456	1,248	1,229	1,007	896
<b>Weight</b>	6,858	34,298	26,511	51,633	41,689	67,339	40,816	44,052	38,848	38,834	29,649	42,479



**Figure 2. Distributions of ivory seizure weights.** Summaries are based on data submitted up to 8 July 2020 that were ETIS validated. Weight seized indicates actual reported raw ivory weights, adjusted reported worked seizure weights by the raw ivory equivalent (RIE) conversion factor, and estimated weights for raw or worked seizures that reported the number of pieces but had missing weights (based on procedures described in Milliken et al. 2018 and Underwood et al. 2013). Grey dots represent seizure case data (mostly visible above median value), and asterisks indicate three large weight seizures made in 2019 in China, Singapore, and Viet Nam and that represent the largest seizures recorded to date in ETIS.



**Figure 3. Distributions of ivory seizure weights for large seizures 500+ kg.** (ETIS Weight Index, 8 July 2020). Boxplots represent 50% of the data centred around the median (horizontal line), and dots represent seizure data. Numbers in parentheses are the number of transactions of 500+ kg weight for each respective year that were used to construct each boxplot.

9. A trend analysis was conducted on the data submitted to ETIS by 19 June 2020 to extend the trend produced at CoP18 to include the years 2018 and 2019. This was presented in the ETIS report to the MIKE-ETIS TAG, and the results were discussed during the meeting on 2 July 2020, acknowledging that results were based on a partial data set. It was decided that the trend analysis should be rerun once further data sets were submitted, and that the report to the Standing Committee should include data summaries rather than the trend analysis. TRAFFIC will continue to seek outstanding data sets from Parties and produce a trend analysis for the next ETIS report to the Standing Committee.

*ETIS data collection concerns*

10. The flow of seizure data to ETIS remains a major concern because the majority of CITES Parties are not reporting elephant product seizure data for inclusion in ETIS in a timely manner. Annex 1 of Resolution Conf. 10.10 (Rev. CoP18) directs CITES Management Authorities to:

*provide information on seizures and confiscations of ivory or other elephant specimens in the prescribed formats ... within 90 days of their occurrence.*

11. If such were the case, all seizure data for one year would be available to ETIS at the latest by the end of March of the following year. Accordingly, Notification to the Parties No. 2020/005 of 14 January 2020 requested the submission of outstanding ETIS reports for 2018 and 2019 by 31 March 2020. Despite this request, 76% of the records reported to ETIS in 2019 were received more than 90 days after the occurrence of the seizure and 62% were received after the deadline established by the CITES Notification. Looking more broadly at the ETIS data, similarly, 83% of the seizure cases reported by government authorities to ETIS in the period 2017 through 2019 were not reported within 90 days of their occurrence, with the average seizure case being reported nearly one year (i.e. 329 days) after the date of occurrence and some records reaching ETIS more than two years after the seizure occurred. Open source data indicate that several of the countries that have not so far submitted data did, in fact, make seizures in 2018 and 2019.
12. In addition to reporting deficiencies potential inconsistencies in data collection and reporting were identified. In Resolution Conf. 10.10 (Rev. CoP18), it is recognised that within a given country the legal mandate to seize elephant products typically lies with a number of law enforcement authorities, including Customs, police and wildlife officers. Thus, the Resolution calls upon “CITES Management Authorities, following liaison with appropriate law enforcement agencies” to report seizures and confiscations of ivory or other elephant specimens for inclusion in ETIS. The Resolution broadly defines seizures as any event “that takes place in their territories”, and the ETIS data collection form specifically allows for Parties to identify any number of legal offences, such as ‘illegal killing’, ‘export’, ‘transit’, ‘import’, ‘offer for sale’, ‘sale’, or ‘possession’ when reporting the reason behind individual seizures. In this regard, seizures are not limited to those made at a country’s ports of exit or entry, but also cover internal markets, protected areas or any other location within a country. To understand the differences in ETIS reporting TRAFFIC distributed a questionnaire through the CITES Secretariat (Notification No 2020/042). Based on results detailed in **Annex 2** of this report, it appears that there is some inconsistency with what Parties report in their ETIS submissions; some Parties report all seizures that take place within their jurisdiction, whether large or small scale, whereas other Parties report only cases considered to be “international trade” i.e. intercepted upon import or export by Customs.

*Discussion: Challenges to produce a trend analysis*

13. The ETIS analysis presented at CITES CoP18 indicated that "over the last four years, our best estimate of global illicit ivory trade activity has shown annual incremental decline after peaking in 2012 and 2013, although broad confidence intervals characterize the results." As discussed in paragraph 9, TRAFFIC had prepared a trend analysis on the basis of the data received by 19 June 2020 to extend the trend produced at CoP18 to include the years 2018 and 2019, but due to concerns over the results that were only based on a partial data set, it was decided that the trend analysis should be rerun once further data sets were submitted. The lack of a trend analysis limits the ability to draw conclusions on trends in ivory trade over the last two years. Despite this it is noted that data received for 2018 and 2019 show that compared to previous years, there were fewer large seizures (over 500 kg). Large seizures have appeared in previous analyses to be indicative of strong illegal ivory trade flows and involvement of organized crime. However, the three record large seizures made and reported in 2019 demonstrate that significant flows of illegal ivory continue. Illegal ivory trade flows at such levels remain a significant concern, stressing the need for sustained implementation of national regulation, law enforcement action, international cooperation and reporting to ETIS. Further investigation into the analysis is required including into the likely extent of influence of missing data from key countries.
14. TRAFFIC stresses the critical importance of Parties submitting data for analysis in a timely fashion to ensure that the results can be interpreted with confidence. Also noted through the analysis of the questionnaire on reporting to ETIS is the need to clarify the scope of data to be submitted to ETIS. Omission of data on “within country” seizures could obscure the true dimensions of the global illegal ivory trade. To ensure more complete reporting, CITES Management Authorities are encouraged to build effective intra-governmental relationships with all agencies holding legal authority, including those at more local administrative levels, to make elephant product seizures so that all relevant seizure data can be collected and reported to ETIS in a timely manner. Issues of data flow and scope will also be considered through the ETIS review.
15. TRAFFIC acknowledges that this is a period of significant flux with ETIS staffing changes as well as the current COVID-19 pandemic; the latter may have significant impacts on illicit supply chains in the coming years. While it is still too early for the current analysis to show any impact of these changes, future ETIS analyses will need to bear these in mind to ensure changes and trends are monitored and identified so that Parties can take the appropriate mitigating actions. Again, accurate and timely submission of data from the Parties is required for this monitoring to be effective

*Progress on requests made to TRAFFIC at SC69 and SC70*

16. At the 69<sup>th</sup> meeting of the CITES Standing Committee (SC69; CITES 2017), the Parties adopted SC69 Com. 11 which, in paragraph 5, included the following four requests to TRAFFIC:
  5. *Contingent on the provision of external funding, the MIKE and ETIS Subgroup recommend that Standing Committee request TRAFFIC to:*
    - a) *Make available the programming code in the ETIS analysis through a repository hosting service, together with appropriate annotations and supporting documentation. This will be augmented with links to existing documents explaining the methods used in the analyses.*
    - b) *Finalise the delivery of an on-line facility for Parties to access, download or upload seizure data. Access will be restricted to designated individuals of CITES Management Authorities. Access to data will be provided in accordance with the data access policy outlined in Resolution Conf. 10:10 (Rev. CoP17).*
    - c) *Send the ETIS report to CoP18 to all Parties identified as potentially requiring attention in the NIAP process at least 30 days prior to the release of the report on the CITES website.*
    - d) *Produce materials that explain in a stepwise manner the ETIS analysis and conceptual framework. Materials will be targeted at a non-technical audience, in three languages, and made freely and widely available.*
17. At the 70<sup>th</sup> meeting of the CITES Standing Committee (SC70; CITES 2018), the Parties adopted SC70 Com. 18 which included the following four requests to TRAFFIC.
  4. *The MIKE and ETIS Subgroup noted the update on ETIS implementation presented by the ETIS Director of TRAFFIC. The Subgroup expressed its appreciation for the diligent work done by TRAFFIC (ETIS) and supported the request by TRAFFIC to undertake a formal assessment relating to ETIS data collection. The Subgroup noted that TRAFFIC will collaborate with the CITES Secretariat on the design, content and distribution of a questionnaire in this regard.*

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  9. *The MIKE and ETIS Subgroup recommend that the Standing Committee request the CITES Secretariat, together with TRAFFIC, to prepare:*
    - a) *an annex of the comments received from Parties on the ETIS report and circulate it as part of the document to be considered by the Parties at CoP18; and*
    - b) *capture in the document whether comments were received and where possible, respond to issues raised by Parties*

.....
  11. *The MIKE and ETIS Subgroup supported the request from TRAFFIC to make aggregated data on the number and weight of ivory seizures available on the CITES website. In this regard the Subgroup recommends that the Standing Committee request TRAFFIC to compile aggregated summaries of the validated ETIS data on an annual basis for presentation on the CITES website.*
18. The following sections briefly outlines the progress on each of these activities (SC69 SR, [SC69 Com 11](#), [SC70 SR](#), [SC70 Com 18](#)).

**SC69 Com 11 paragraph 5a): Provision of the ETIS Code**

19. In advance of CoP18 TRAFFIC provided the R code that was used to produce the CITES CoP18 analysis on a public domain on Github: <https://github.com/CITES-ETIS/ETIS-R-Scripts>.

**SC69 Com 11 paragraph 5b): Developing an ETIS Online facility for the CITES Parties**

20. The development of an ETIS Online facility built on a former initiative funded under the U.K. government's Darwin Initiative programme which supported the creation of an ETIS website through which TRAFFIC manages the ETIS data on behalf of the CITES Secretariat. ETIS Online was further developed to offer the CITES Parties, in the three languages of the Convention (English, French and Spanish), an on-line access to all seizure records that relate to their country. It will enable CITES Parties to review and download their ETIS data whenever they need to, and to create new records on-line either individually or as part of a specially-designed ETIS Excel template that allows multiple seizure records to be submitted and integrated into the database at a single time. To achieve this goal, it was necessary to engage technical experts to develop and test various website features. The development of ETIS Online has been an enormous undertaking. The development of the online facility to make the ETIS seizure data directly accessible to the CITES Parties has been somewhat delayed due to several issues including lack of compatible timings for collaborative engagement between database developer and the ETIS statistician. Delays of the CITES CoP also had a knock-on impact on aspects of necessary engagement with the CITES Secretariat.
21. ETIS Online was tested in July 2020 with the aim of launching the system in September 2020 for use by the Parties. Training materials and other resources will also be made available to further support the system. Further funding will be sought for capacity building with the Parties on use of ETIS Online.

**SC69 Com 11 paragraph 5c): Liaison with the CITES Parties prior to CoP18**

22. A comprehensive report on ETIS data as mandated through Resolution Conf. 10.10 (Rev. CoP18) was produced for CoP18. This identified countries most- and markedly affected by illegal ivory trade according to the most recent analysis. As per instructions from SC69, the ETIS report to CoP18 was circulated to those Parties who were identified as "*potentially requiring attention in the NIAP process at least 30 days prior to the release of the report on the CITES website*". In addition, the former ETIS Lead (Tom Milliken) had individual correspondence and engagement with some of the CITES Parties.

**SC69 Com 11 paragraph 5d): Production of explanatory materials on the ETIS conceptual framework and methods for non-technical audiences**

23. A layman's guide to 'Understanding ETIS' has been developed for non-technical audiences. Versions of this pamphlet were distributed at CoP18 and are available in English and French on the TRAFFIC website (<https://www.traffic.org/what-we-do/projects-and-approaches/trade-monitoring/elephant-trade-information-system/>).

**SC70 Com 18 paragraph 4): Assessment on ETIS data collection**

24. TRAFFIC collaborated with the CITES Secretariat on the design, content and distribution of a questionnaire, which was circulated as Notification 2020/042, with a month for completion. Response rate has been disappointing with only 15 Parties submitting completed questionnaires by 22 June 2020. By 23 July a total of 21 responses from 20 Parties had been received, all of which are included in the report in **Annex 2** to this report.
25. It was anticipated that this assessment would assist in informing future approaches to the bias adjustment that forms part of the analytical framework used by ETIS to analyse seizure data. However, due to low response rates this will not be possible. One recommendation stemming from the assessment was the need to clarify that ETIS reporting should include any kind of ivory seizure that takes place in a country, not just events that occur at the point of illegal importation or export (see **Annex 2**). This language is reflected in the ETIS training toolkit, but further clarification in Resolution Conf. 10.10 (Rev. CoP18) should be considered.

**SC70 Com 18 paragraph 9): CoP18 report annexes**

26. TRAFFIC was requested to prepare annexes to the CoP18 ETIS document that reflect the comments received from CITES Parties on the ETIS report and the changes made to the report based on the comments. The annexes requested were appended to the report to CoP18 in [CoP18 Doc 69.3 \(Rev. 1\)](#) Annex 2 and 3.

**SC70 Com 18 paragraph 11): Make aggregated data on the number and weight of ivory seizures available on the CITES website.**

27. The webpage for ETIS on the CITES website is being developed by TRAFFIC, which will include the aggregated data summaries.
28. Country summaries have been compiled on the number of seizures made by each country and the weight of those seizures for the period 2008 to 2019. However, as noted above, the data for 2018 and 2019 are incomplete with a number of Parties not having submitted reports for one or both of those years. Seizure weight includes the estimated weight of raw ivory equivalent for worked seizures cases and/or the estimation of weights for cases where only the number of pieces were reported but not the ivory weight. This weight estimation is based on a model using all data available in ETIS at the time and recalculates the missing weight figures for past years too, therefore the weights may differ marginally from the weights used in the analyses for CoP18.
29. Aggregated data will be available through the CITES webpage. The user will be able to select a CITES region to access a summary for that region including individual country summaries (see example in **Annex 3**). Data presented are for seizures made within that country. Separate tables with cases where that country was implicated in a seizure made by another country (e.g. a shipment was seized elsewhere having come from that country or transited through it) will also be made available once completed.

#### *TRAFFIC Acknowledgements*

TRAFFIC acknowledges the years of tireless service that Tom Milliken has devoted to the development and running of ETIS. TRAFFIC would like to thank Fiona Underwood for the production of the ETIS analyses up until CoP18. TRAFFIC would furthermore like to thank Fiona Underwood and Bob Burn for the development of the approaches to the data analysis.

The ETIS program is entirely dependent on donor support. TRAFFIC is grateful for the generous contributions of the following:

Darwin Initiative a UK government grants scheme, The European Union, The German Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, The Belgian Federal Public Service for Food, Health, and the Environment, The Ministry of Agriculture, Nature, and Food Quality of the Netherlands, University of Reading, U.S. Fish and Wildlife Service, U.S. Agency for International Development, World Wildlife Fund UK.

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**Number of ivory seizure cases reported to ETIS by country from 2008 – 2019.**

*Summaries are based on data submitted up to 8 July 2020 that were ETIS validated*

Country	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
AE	4	3	1	8	9	8	3	2	9	10	1	3	61
AO	0	0	0	2	13	29	5	1	11	2	2	0	65
AT	0	1	1	0	0	1	6	3	1	1	0	0	14
AU	81	60	32	45	29	28	23	4	14	10	11	5	342
BD	0	0	0	0	0	1	0	0	0	0	0	0	1
BE	7	5	29	51	61	27	4	1	2	16	34	38	275
BF	0	0	1	0	0	0	0	0	1	0	0	1	3
BI	1	0	0	0	0	1	0	0	0	1	0	2	5
BJ	0	0	0	0	0	0	2	1	7	6	5	3	24
BW	14	18	13	15	2	25	12	16	10	19	7	2	153
CA	6	0	0	1	5	4	3	0	5	3	0	6	33
CD	0	0	2	0	1	0	1	11	6	2	6	0	29
CF	0	2	2	0	0	0	0	0	1	0	0	0	5
CG	3	0	0	8	0	3	2	3	5	12	10	7	53
CH	6	2	10	6	4	11	3	16	15	4	6	1	84
CI	0	0	0	0	0	4	10	4	2	8	1	14	43
CM	6	11	6	13	13	33	22	27	11	9	6	7	164
CN	52	733	707	834	388	433	272	233	142	101	118	207	4220
CY	0	0	0	0	0	0	1	0	0	0	0	0	1
CZ	1	4	0	0	0	0	3	0	6	4	0	0	18
DE	26	60	35	31	60	71	41	37	26	17	13	6	423
DK	1	0	3	2	1	1	0	3	1	1	0	0	13
EE	0	0	0	0	0	0	0	1	0	0	0	0	1
EG	0	0	0	1	3	8	12	3	5	4	0	0	36
ES	0	1	24	0	0	3	1	0	3	0	1	0	33
ET	4	5	1	163	111	154	103	100	42	43	11	6	743
FR	10	7	25	81	23	46	94	89	62	48	1	0	486
GA	1	1	16	3	3	10	12	15	13	29	30	16	149
GB	8	16	8	31	45	42	31	152	131	177	121	53	815
GN	0	0	0	0	3	3	0	0	1	0	1	0	8
GR	1	0	0	0	0	0	0	0	0	0	0	0	1
HK	4	6	40	40	56	114	117	130	41	66	50	23	687
HR	0	0	0	0	0	0	0	1	0	0	0	0	1
HU	0	1	0	0	0	1	3	1	1	5	0	0	12
ID	2	1	0	0	0	0	3	2	4	3	1	2	18

Country	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
IE	0	0	0	2	0	0	0	0	0	0	0	0	2
IL	0	0	0	0	0	0	0	0	0	0	1	0	1
IN	5	12	9	6	2	3	13	11	12	29	24	33	159
IT	3	0	0	0	1	3	1	18	0	4	7	0	37
JO	0	0	0	0	0	0	0	0	0	0	2	0	2
JP	6	3	5	2	0	0	7	10	4	3	4	1	45
KE	30	87	59	67	61	56	133	71	111	95	92	78	940
KH	0	0	0	0	0	7	5	1	2	1	1	2	19
KR	0	0	0	1	0	0	0	0	0	0	0	0	1
LA	0	0	0	0	0	0	0	1	0	2	3	1	7
LK	0	0	0	0	1	0	1	1	1	3	2	1	10
LV	0	0	0	0	0	1	0	0	0	1	0	0	2
ML	0	0	0	0	0	1	0	0	0	0	0	0	1
MM	0	0	3	2	1	1	3	5	2	1	0	0	18
MO	0	0	1	0	1	2	1	0	0	0	0	0	5
MT	0	0	0	1	0	1	0	0	0	0	0	0	2
MW	0	0	1	8	4	9	6	4	40	35	27	16	150
MX	0	0	0	0	1	0	0	0	0	0	0	0	1
MY	0	0	0	4	3	4	3	7	11	5	0	0	37
MZ	20	0	0	2	2	10	2	7	4	12	5	0	64
NA	14	24	14	25	22	32	19	19	67	51	43	59	389
NG	0	0	4	8	2	6	12	8	8	7	4	1	60
NL	16	16	5	11	7	8	22	17	27	15	11	5	160
NO	0	0	0	0	1	0	0	0	0	0	0	0	1
NP	0	0	0	0	1	2	1	1	0	1	1	0	7
NZ	2	1	0	7	7	3	9	6	7	7	5	8	62
PA	0	0	0	0	0	0	0	0	1	0	0	0	1
PH	0	2	0	0	0	0	0	0	0	0	0	0	2
PL	2	1	0	0	0	0	0	0	0	0	0	0	3
PT	23	0	5	2	1	6	4	8	1	1	0	0	51
QA	1	0	0	0	0	0	1	1	0	2	0	0	5
RO	0	0	0	0	1	0	2	1	0	0	0	0	4
RW	0	0	0	0	0	0	1	0	0	0	0	0	1
SA	0	0	0	0	0	0	1	0	0	0	0	0	1
SD	41	57	56	88	49	46	4	0	0	0	0	0	341
SE	2	0	0	0	0	0	1	0	2	0	0	0	5
SG	0	0	0	0	0	1	3	3	0	1	1	2	11
SI	1	0	0	0	0	0	0	0	0	0	0	0	1
SN	0	0	0	0	0	0	1	1	3	2	0	4	11
SS	0	0	0	0	0	1	0	0	2	0	1	0	4
TD	0	0	0	2	0	0	0	2	1	0	0	0	5

Country	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	Total
TG	0	0	0	1	1	4	4	2	3	2	0	1	18
TH	1	2	6	3	7	4	12	18	5	10	6	1	75
TN	0	0	0	0	0	0	0	0	0	1	0	0	1
TR	0	0	0	0	1	0	0	0	1	0	0	1	3
TW	2	2	0	2	2	0	0	3	2	2	1	0	16
TZ	11	27	17	32	91	126	54	54	46	39	19	35	551
UG	5	1	0	11	15	21	23	12	22	72	36	76	294
US	72	113	136	196	185	151	157	185	139	100	131	114	1679
VN	0	6	11	10	5	6	10	12	22	13	5	7	107
ZA	9	24	10	25	27	16	10	25	44	16	8	15	229
ZM	16	11	21	27	23	26	20	57	47	64	111	1	424
ZW	14	29	27	18	23	18	17	29	33	31	20	32	291
<b>Total</b>	2542	3364	3356	3909	3390	3649	3366	3471	3264	3246	3025	2915	15335

## Analysis of Responses to Questionnaire on ETIS data collection

July 2020

### 1. Background

The Elephant Trade Information System (ETIS) was established under Resolution Conf. 10.10 (Rev. CoP18) on *Trade in elephant specimens* to track the trends in the illegal trade in ivory and other elephant specimens, and to provide an information base to support decision-making on management, protection and enforcement needs for elephants. ETIS is managed and coordinated by TRAFFIC for CITES.

Pursuant to Annex 1 of Resolution Conf. 10.10 (Rev. CoP18) regarding '*Monitoring illegal trade in ivory and other elephant specimens*', "following liaison with appropriate law enforcement agencies" Parties "*should provide information on seizures and confiscations of ivory or other elephant specimens in the prescribed formats either to the CITES Secretariat or directly to TRAFFIC within 90 days of their occurrence*".

Under paragraph 23 of Resolution Conf. 10.10 (Rev. CoP18), the Conference of the Parties "*urges Parties to collect samples from large-scale ivory seizures (i.e. a seizure of 500 kg or more) that take place in their territories, preferably within 90 days of the seizure or as soon as allowed under judicial processes, and provide these to forensic and other research institutions capable of reliably determining the origin or age of the ivory samples in support of investigations and prosecutions*".

Under paragraph 24 of Resolution Conf. 10.10 (Rev. CoP18), the Conference of the Parties "*recommends that Parties share with the Secretariat and source countries information on the origin or age of seized ivory specimens arising from forensic analysis of samples to facilitate investigations and prosecutions, and for analysis by MIKE and ETIS in their reporting to the Standing Committee and the Conference of the Parties*".

At its 70th meeting (SC70; Sochi, October 2018), the Standing Committee took note of the report of the MIKE-ETIS Subgroup (document SC70 Com.18), which states:

*The MIKE and ETIS Subgroup noted the update on ETIS implementation presented by the ETIS Director of TRAFFIC. The Subgroup expressed its appreciation for the diligent work done by TRAFFIC (ETIS) and supported the request by TRAFFIC to undertake a formal assessment relating to ETIS data collection. The Subgroup noted that TRAFFIC will collaborate with the CITES Secretariat on the design, content and distribution of a questionnaire in this regard.*

It was anticipated that this assessment would assist in informing future approaches to the bias adjustment that forms part of the analytical framework<sup>2</sup> used by ETIS to analyse seizure data.

Thanks to funding from the Federal Ministry for the Environment, Nature Conservation and Nuclear Safety, Germany, a consultant was engaged to develop a questionnaire on data collection for ETIS. The questionnaire was reviewed and approved by TRAFFIC and the CITES Secretariat.

The questionnaire was shared with Parties on 18 May 2020 through a [Notification to the Parties](#) and [accompanying Annex](#). Parties were invited to fill in the questionnaire using Word, or through an [online option](#). Parties were provided with one month to submit their responses. However, due to the number of responses submitted after this deadline, late responses were accepted up until 23 July 2020.

### 2. Respondents

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<sup>2</sup> Underwood, F. M., Burn, R. W., & Milliken, T. (2013). Dissecting the Illegal Ivory Trade: An Analysis of Ivory Seizures Data. *PLoS ONE*, 8(10), e76539. <https://doi.org/10.1371/journal.pone.0076539>

A total of 21 responses to the Notification to the Parties were received from 20 Parties by the published deadline (Table A1). Although a somewhat disappointing response rate, this is a significant sample as these 20 countries represent 50% of the seizure records in the database from 2010 to 2019.

**Table A1. Respondents to questionnaire.**

<b>Party</b>	<b>Agency</b>
Austria	CITES Management Authority
Botswana	Department of Wildlife and National Parks (CITES MA)
Cambodia	Forestry Administration
Canada	Environnement et Changement Climatique Canada – Direction générale de l'application de la loi – Application de la loi sur la faune (CITES MA)
China	The Endangered Species Import and Export Management Office of P.R. China (China CITES MA)
Denmark	Environmental Protection Agency (EPA) (CITES MA)
Germany	Federal Agency for Nature Conservation (FANC), CITES Management Authority
Japan	Ministry of Economy, Trade and Industry (METI) (CITES MA) National Police Agency Customs and Tariff Bureau
Namibia	Ministry of Environment, Forestry and Tourism (CITES MA)
Netherlands	Netherlands Enterprise Agency (RVO) – CITES Unit disposal of confiscated specimen
Singapore	National Parks Board (CITES MA)
Slovakia	Ministry of Environment of the Slovak Republic - CITES Management Authority
South Africa	Department of Environment, Forestry and Fisheries (CITES MA)
Switzerland	Federal Food Safety and Veterinary office/ CITES Management Authority
Thailand	CITES Management Authority - Department of National Parks, Wildlife and Plant Conservation (CITES MA)
Togo	Office Central de Répression du Trafic Illicite des Drogues et du Blanchiment (OCRTIDB)
Tunisia	Direction Générale des Forêts Ministère de l'Agriculture, de la Pêche Maritime et des Ressources Hydrauliques (CITES MA)
United Kingdom	Border Force
United Kingdom	National Wildlife Crime Unit
United States of America	U.S. Fish and Wildlife Service (CITES MA)
Zimbabwe	Zimbabwe Parks and Wildlife Management Authority (CITES MA)

### 3. Summary of responses

#### 3.1 QUESTION 2 INFORMATION ON INDIVIDUAL COMPLETING THE QUESTIONNAIRE

Information was requested on the experience level of the individual completing the questionnaire. Eight respondents had been in their position for between one and five years, five had been in their position for between five and 10 years, and eight had been in their position for over 10 years. In all cases except two, the respondent had responsibility to report illegal ivory seizures to ETIS.

#### 3.2 QUESTION 3 GUIDELINES ON REPORTING SEIZURES AND STOCKPILES THROUGH CITES SYSTEMS

Information was requested on the existence of national or agency-level guidelines for reporting illegal ivory seizures and stockpiles to the CITES Secretariat or ETIS. The responses are summarised in Table A2.

**Table A2. Guidelines on reporting seizures and stockpiles through CITES systems.**

Question	Yes	No	Don't know	No answer
Are there written guidelines for reporting on seizures of illegal ivory to ETIS?	7	12	1	1
Are there written guidelines for reporting on stockpiles of illegal ivory to the CITES Secretariat?	4	13	2	2

### 3.3 QUESTION 4 AUTHORITIES MANDATED TO MAKE SEIZURES OF ILLEGAL IVORY

Of the 21 respondents, 13 listed multiple different agencies that are mandated to make seizures of illegal ivory. These included:

- CITES Management Authorities;
- Customs and revenue departments;
- Wildlife, forestry and protected area authorities;
- Police;
- Environmental protection agencies;
- Regional and local management authorities; and
- Immigration departments.

In most cases, respondents only provided detailed information on one agency, usually the Management Authority.

Of the respondents that listed additional agencies, four provided detailed information on multiple agencies. Information under this question was provided for a total of 28 agencies. Not all agencies answered all questions.

#### Jurisdiction

Twenty-three agencies had a nationwide jurisdiction, while two had a sub-national jurisdiction. An additional two agencies were only mandated to make seizures of illegal ivory in a restricted sub-location, such as bonded areas of ports of entry.

All respondents provided detail on the specific laws and regulations that mandate agencies to make seizures of illegal ivory.

#### Training

Ten agencies reported that staff were trained in reporting of illegal ivory seizures to TRAFFIC and CITES, while 16 agencies reported that staff were not trained in this reporting. Two respondents did not give an answer.

#### Likelihood of submitting information to the CITES Management Authority

Fifteen agencies were considered very likely, and five somewhat likely, to submit information on an ivory seizure to the agency mandated to report it to TRAFFIC or CITES.

#### Frequency of reporting to the CITES Management Authority

Agencies used a variety of methods for reporting seizures to the CITES Management Authority, with many agencies using more than one method.

The reported methods of transmitting information on an ivory seizure were: email (10); entry into national database (1); paper records (11); spreadsheet (5); standardized form (10); telephone call (3).

The frequency of reporting seizure data to the mandated agency was reported as: every month (2); every three months (2); every year (7); in response to a request from the CITES Management Authority (8); and every time a seizure occurs (9).

### 3.4 QUESTION 5 GENERAL INFORMATION ON IVORY SEIZURES

A variety of responses were submitted in relation to their countries' role in the illegal ivory trade. As expected most elephant range States that responded identified themselves as source countries for ivory, although one also noted that it seemed to be mostly ivory, including worked ivory, from other countries transiting through. One country identified itself as a source of pre-Convention ivory pieces being illegally exported without the required CITES documentation usually in postal parcels or air courier parcels.

Some responses regarding whether Parties considered themselves destination for illegal ivory appeared to be at odds with the data contained within ETIS. Further exploration of individual countries and their responses will be undertaken to understand respondents' perceptions further.

### 3.5 QUESTION 6 AUTHORITIES MANDATED TO REPORT SEIZURES TO TRAFFIC FOR INCLUSION IN THE ETIS DATABASE

This question focused on the agencies specifically mandated to report seizures to TRAFFIC or CITES for inclusion in the ETIS database. For all Parties except one, only one agency held this mandate.

Five agencies reported that reporting of seizures to TRAFFIC or CITES was specifically mentioned in regulations, guidelines or standard operating procedures for the agency.

Nine agencies reported that staff received training in reporting seizures to TRAFFIC or CITES, with one reporting a single training workshop from 2009 as opposed to a regular training programme. Ten reported that staff do not receive training.

Eleven agencies responded that it was necessary to translate reports before submission to ETIS, while nine reported that no translation was required.

Records were submitted using multiple methods: ETIS data for individual seizures (8); ETIS spreadsheet for multiple seizures (7); output from own database system (6); and other (2).

The frequency of reporting seizures to TRAFFIC or CITES was reported as follows: every month (1); every three months (4); within 90 days of seizure being made (4); every year (5); in response to a request from TRAFFIC (6); and in response to a notification from the CITES Secretariat (8); and other (3).

Two respondents noted that ivory seizure data is not included in their Annual Illegal Trade Reports, while 18 responded that ivory seizures were included in these reports. One respondent did not answer.

### 3.6 QUESTION 7 ETIS ONLINE

Three questions were asked regarding the new functionality of ETIS Online.

- Is your country likely to use the online system to enter data records?
- Will your country find it useful to look at records that your country has submitted?
- Will your country find it useful to look at records submitted by others in which your country is implicated?

Almost all respondents responded YES to all three questions. Several comments were made:

- We will not use the online system to enter data records because the Management Authority relies on others to do the report who will not have access to the online system.
- The security of the system must be demonstrated before committing to use it.
- Having a record of all a country's submissions will be useful to share with other agencies internally.
- It is very difficult to obtain information on other records in which a country has been implicated so that will be very useful.
- It will be useful to look at records submitted by others in which a country is implicated as this impacts the accuracy and usefulness of the ETIS analysis.

### 3.7 QUESTION 8 TYPES OF SEIZURES REPORTED TO TRAFFIC

Table A3 provides the responses to the questions on the types of seizures reported to TRAFFIC or CITES for inclusion in ETIS.

Two Parties commented that they always report illegal ivory that is imported or exported illegally, implying that domestic seizures are not reported for inclusion in ETIS.

The seven Parties that responded never to the questions of whether seizures made by protected area managers are reported to ETIS included one African and two Asian range States.

**Table A3. Responses on types of seizures reported.**

Question	Always	Often	Some-times	Rarely	Never	No answer
8a) Seizures of raw ivory are reported to TRAFFIC.	17		1			3
8b) Seizures of worked ivory are reported to TRAFFIC.	17		1			3
8c) Seizures of illegal ivory that result in confiscation, but no fine or other penalty, are reported to TRAFFIC.	15	1	1			4
8d) Seizures that result in confiscation of illegal ivory and a fine are reported to TRAFFIC.	15	1	1	1		3
8e) Seizures of illegal ivory that result in a criminal investigation are reported to TRAFFIC.	16		2			3
8f) Seizures of illegal ivory made by protected area managers in the field are reported to TRAFFIC.	4				7	10
8g) Abandoned shipments of illegal ivory are reported to TRAFFIC.	15			1		5
8h) Seizures of illegal ivory of 100kg or more are reported to TRAFFIC.	15	1		1		4
8i) Seizures of illegal ivory of 10kg or more are reported to TRAFFIC.	16		1			4
8j) Seizures of illegal ivory of 1kg or more are reported to TRAFFIC.	17		1			3
8k) Seizures of illegal ivory for which an accurate weight cannot be provided are reported to TRAFFIC.	15		1		1	4
8l) Seizures of illegal ivory for which only very limited information is available are reported to TRAFFIC.	17			1		3
8m) Seizures of illegal ivory that result from illegal domestic trade are reported to TRAFFIC.	14		1		2	4

### 3.8 QUESTION 9 REPORTING INFORMATION FROM FORENSIC TESTING OF LARGE-SCALE SEIZURES

Of the 12 respondents that responded that they had made large-scale illegal ivory seizures, one responded that they submit information from forensic analysis to TRAFFIC. Eight responded that they do not submit information from forensic testing of these seizures on the origin and age of the illegal ivory to TRAFFIC. Two responded don't know, and one did not respond. Specific comments were made as follows:

- There has no precedent. But if we do chronological measurement, the result will be reported.
- The CITES requirement is for ETIS report to be submitted within 90 days. Usually collection of samples and sending it overseas and forensics analysis takes longer than 90 days.
- It is still under analysis.

### 3.9 QUESTION 10 NON-GOVERNMENTAL ORGANISATIONS

All the respondents responded that Non-Governmental Organisations were not mandated to make or report seizures of illegal ivory to TRAFFIC or CITES.

### 3.10 QUESTION 11 COMPLETENESS OF ETIS DATA FOR YOUR COUNTRY

When asked what percentage of seizures of ivory made in your country between 2016 and 2019 have been reported to TRAFFIC most respondents responded 100% or 67-99%. However, given the information in question 8 it seems that some countries have a policy not to report certain seizure information.

### 3.11 QUESTION 12 PURPOSE OF REPORTING SEIZURES TO TRAFFIC

STATEMENT	TRUE	FALSE	NO ANSWER	COMMENTS
12a) Reporting seizures to TRAFFIC helps to build a global picture of the illegal trade in ivory.	20		1	<p>There is a need to devise further ways of presenting the results, for example, by organizing them according to the type of illegal transactions so that each country can report them in accordance with the purpose of the Convention and on the basis of common understanding.</p> <p>Or of the effectiveness of an enforcement system that is in place in a country. High numbers of seizures should not necessarily be considered a bad thing but might represent strong enforcement which is in place. On the other hand, low numbers of seizures might be worrying. This needs to be looked at and evaluated carefully and considered in reports. Levels of seizures are not necessarily representative of levels of trade.</p> <p>It is easier to report data based on facts than to find the global facts by analyzing the data.</p>
12b) Reporting seizures to TRAFFIC when little is known about the shipment is not useful.	2	15	4	<p>Even little information can be helpful, but it depends on the type of information available.</p> <p>TRUE AND FALSE It probably depends on the case. If little is known, it might as well be a pre-convention item/ seizure and not representative of the current illegal trade problematics.</p> <p>Reporting every seizure is useful although you cannot do a lot if there is no info.</p>
12c) Reporting to TRAFFIC demonstrates my country's law enforcement success.	14	4	3	<p>TRUE AND FALSE Yes and no. It demonstrates one aspect of law enforcement but a seizure does not equal a success, it also depends what is done with the information, how is it followed up and shared, how is the legislation and many other factors.</p> <p>Not successes' rather enforcement efforts</p> <p>Reporting is useful and important for monitoring and insight, shows the commitment.</p>
12d) Reporting to TRAFFIC demonstrates my country's commitment to combatting the illegal trade in wildlife.	16	1	4	<p>It is true in the sense of international cooperation, but it should not be the purpose of the reporting.</p>
12e) Reporting to TRAFFIC results in my country being penalized for effective enforcement work and successes.	4	12	5	<p>While this statement is false, it is true that the ETIS report is sometimes misinterpreted and misunderstood</p>

				<p>TRUE AND FALSE: This could actually be the case for some countries. Often, there is a negative focus on countries that frequently report large seizures.</p> <p>It depends –negatively affect when other Parties report on seizures originating from your country and you know if is impossible that the ivory originated from your country –eg Vietnam seizure of a large scale shipment.</p>
12f) Please provide any further information on why your country may not report all seizures.				<p>When ivory and ivory product imported/ exported illegally are found, we report without exception.</p> <p>We did not receive the report of all seizures from the enforcement agencies.</p> <p>There are no reasons not to report.</p> <p>We believe that any information, even incomplete, may prove useful.</p> <p>Only if a seizure has been made by one of the law enforcement agencies and it has not been reported to us.</p>

#### 4. Discussion and recommendations

##### 4.1 KEY FINDINGS

The low response rate to the questionnaire reduces how meaningful the analysis can be and the potential to use the information to inform the analysis of ETIS data, in particular the approaches to the bias adjustment for reporting rate. Only five of 37 African elephant range States responded to the questionnaire. Only five Parties, that are participating in the National Ivory Action Plan process<sup>3</sup>, submitted responses. Despite the low levels of reporting, the information provided by respondents has useful insights, with the 20 countries responding representing 50% of the seizure records in the ETIS database from 2010 to 2019, therefore the responses are still meaningful and provide useful insights. TRAFFIC encourages Parties to continue to submit completed questionnaires.

Very few respondents reported guidelines for reporting illegal ivory seizures or ivory stockpiles to TRAFFIC or CITES. A majority of the respondents reported that there is no system for training on submission of information on illegal ivory seizures to ETIS. Half of the respondents reported that information needed to be translated before it could be submitted to TRAFFIC or CITES.

Most respondents have multiple agencies mandated to make seizures, but only one mandated to report to TRAFFIC or CITES. They reported that it was very or somewhat likely for information to be transferred from one agency to another with the responsibility to submit information to TRAFFIC and CITES.

Only four of the respondents noted that they were likely to submit information on ivory seizures to TRAFFIC or CITES within 90 days as recommended in Resolution Conf. 10.10 (Rev. CoP17). Two Parties noted that the illegal ivory seizure data that is submitted for inclusion in ETIS is not included in their country's CITES Annual Illegal Trade Reports. Only one Party responded that they provide information on the results of forensic analysis of large-scale ivory seizures to TRAFFIC.

There was a positive response to the ETIS Online system particularly in relation to Parties' ability to check data relating to them, both submitted by them and where they have been implicated through the reporting of other Parties. The online system should also reduce the need to request countries' reports from ETIS.

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<sup>3</sup> National Ivory Action Plan Parties: Category A – Malaysia, Mozambique, Nigeria, Togo, Viet Nam; Category B: China and Hong Kong SAR, Kenya, Uganda, Tanzania; Category C – Angola, Burundi, Cambodia, Cameroon, Congo, Democratic Republic of Congo, Ethiopia, Gabon, Lao People's Democratic Republic, Qatar, Singapore, South Africa, Turkey, United Arab Emirates, Zimbabwe.

At least two Parties made it clear that they only report illegal ivory seizures that result from law enforcement action at a point of entry/exit, and do not report ivory seizures made domestically. This reduces the information on illegal ivory trade that can be used for modelling the data. A thorough analysis of open source data would assist with understanding the extent of information not currently being submitted by Parties.

There remains a perception with some of the Parties reporting (although a minority of respondent) that reporting into the ETIS system results in a country being penalized, and that there continues to be a lack of understanding of the process by which the ETIS analysis uses bias adjustment to model the illegal ivory trade.

#### 4.2 RECOMMENDATIONS FOR THE MIKE-ETIS SUBGROUP

Based on these findings, a number of recommendations can be made.

1. The MIKE ETIS Subgroup of the Standing Committee could consider the need to clarify that ETIS reporting should include any kind of ivory seizure that takes place in a country, not just events that occur at the point of illegal importation or export. This language is reflected in the ETIS training toolkit, but further clarification in Resolution Conf. 10.10 (Rev. CoP18) could be considered.
2. The MIKE ETIS Subgroup of the Standing Committee could remind the Parties of the recommendation to report the results of any forensics testing carried out on large scale seizures referred to in paragraph 23 of Res. Conf. 10.10 (Rev. CoP18) and encourage Parties to report this to the Secretariat who will make this information available for analysis by MIKE and ETIS (as per paragraph 24).
3. The MIKE ETIS Subgroup in collaboration with TRAFFIC could develop a strategy to overcome the inaccurate perception of some Parties that reporting into the ETIS system results in a country being penalized.
4. Given the positive feedback and potential for improvement of reporting with using ETIS Online, TRAFFIC will continue to raise the necessary funding to develop and implement structured training on how to use ETIS, which also provide refresher training on the reporting requirements of Resolution Conf. 10.10 (Rev. CoP18) and improve communication channels with CITES Management Authorities. In developing training materials TRAFFIC should take into account the comments made regarding the likely use of ETIS Online by the Parties in order to promote its use, and improve the submission of data in a timely manner.
5. Parties that did not complete questionnaires to date are again encouraged to submit completed questionnaires which provide useful insights into ETIS reporting and can continue to inform recommendations 1-4. Pending future funding, TRAFFIC will update this summary report incorporating additional responses.

**Example aggregated summaries of seizures made for East Asia region.**

**EAST ASIA**



**Summaries for East Asia**

Summaries are based on data submitted up to 8 July 2020 that were ETIS validated. Weight seized indicates actual reported raw ivory weights, adjusted reported worked seizure weights by the raw ivory equivalent (RIE) conversion factor, or estimated weights for raw or worked seizures that reported the number of pieces but had missing weights (based on procedures described in Milliken et al. 2018 and Underwood et al. 2013). Regions are defined by CITES here: <https://www.cites.org/eng/disc/parties/chronolo.php>

		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
China	Seizures (no)	52	733	707	834	388	433	272	233	142	101	118	207
	Weight (kg)	1,656	3,998	1,723	13,794	9,140	7,253	2,986	3,443	1,832	933	1,133	8,527
Hong Kong SAR	Seizures (no)	4	6	40	40	56	114	117	130	41	66	50	23
	Weight (kg)	108	147	3,024	3,229	5,451	8,265	2,696	1,958	728	7,707	422	2,138
Japan	Seizures (no)	6	3	5	2	0	0	7	10	4	3	4	1
	Weight (kg)	20	84	5	150	0	0	112	97	6	63	3	11
Korea, Republic of	Seizures (no)	0	0	0	1	0	0	0	0	0	0	0	0
	Weight (kg)	0	0	0	60	0	0	0	0	0	0	0	0
Macau SAR	Seizures (no)	0	0	1	0	1	2	1	0	0	0	0	0
	Weight (kg)	0	0	244	0	32	72	39	0	0	0	0	0
Taiwan, Province of China	Seizures (no)	2	2	0	2	2	0	0	3	2	2	1	0
	Weight (kg)	22	11	0	63	8	0	0	13	44	45	7	0