

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA



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COMMENTS FROM THE MIKE-ETIS TECHNICAL ADVISORY GROUP (TAG) ON  
COP17 INF. 23

This document has been submitted by the United Kingdom of Great Britain and Northern Ireland on behalf of the MIKE-ETIS Technical Advisory Group\* in relation to agenda item 57.6 on *Report on the Elephant Trade Information System (ETIS)* and CoP17 Inf. 23 on *A review on monitoring of trade in ivory: Fact, methodology and information*.

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**Comments from the MIKE-ETIS Technical Advisory Group (TAG) on**

**CoP17 Inf. 23 submitted by China on Behalf of the**

**China Wildlife Conservation Association (CWCA) Concerning**

***“A Review on Monitoring of Trade in Ivory: Fact, Methodology, and Information”***

Background

The Elephant Trade Information System (ETIS) is one of two monitoring systems, the other being the Monitoring the Illegal Killing of Elephants (MIKE), mandated by the CITES Parties to support elephant conservation under the Convention. The objectives of ETIS and MIKE are given in Resolution Conf. 10.10 (Rev. CoP16) as follows:

- i. measuring and recording levels and trends, and changes in levels and trends, of illegal elephant killing and trade in ivory and other elephant specimens in elephant range States, ivory consumer States and ivory transit States;*
- ii. assessing whether and to what extent observed trends are related to: measures concerning elephants and trade in elephant specimens taken under the auspices of CITES; changes in the listing of elephant populations in the CITES Appendices; or the conduct of legal international trade in ivory;*
- iii. establishing an information base to support the making of decisions on appropriate management, protection and enforcement needs; and*
- iv. building capacity in elephant range States and, as applicable, countries involved in trade in elephant specimens, to implement and make use of MIKE and ETIS in managing elephants and enhancing enforcement.*

Other directives given in this Resolution and its annexes serve to guide the operation, management and outputs of the two monitoring systems. ETIS uses global ivory seizure data for assessing illegal trade in ivory and the database currently comprises some 26,000 records from over 100 countries. The methods employed for assessing seizure data have been published in the peer review scientific literature (see 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 <http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0076539>). ETIS reports to CITES Conferences of the Parties (CoP) are reviewed by the MIKE/ETIS Technical Advisory Group (TAG) prior to their submission to the CITES Secretariat. ETIS continues to improve its methods so that accurate representations of illegal ivory trade can consistently be delivered to the CITES Parties. The MIKE-ETIS TAG welcomes this opportunity to clarify a number of issues raised with respect to ETIS in CoP17 Inf. 23 submitted by China on behalf of the China Wildlife Conservation Association (CWCA).

## 1. Comments on ETIS Methods

The CWCA paper suggests that ETIS uses “*an error-prone methodology*” and raises the following eight issues:

*1.1 An indicator, SEIZURE IN / (SEIZURE IN+SEIZURE OUT), is designed to describe law enforcement efforts and used to adjust bias. While the indicator could properly describe the law enforcement condition in origin country, it is improper when describing the counterparts in transit or destination country.*

Comment: ETIS uses knowledge of ivory trade chains that derive from seizure records to assess the relative law enforcement effort made by countries in interdicting illegal ivory consignments. Seizures can occur at any point along the trade chain, but whether they happen -- or not -- is a function of law enforcement effort which can vary greatly between and within countries over time. ETIS calculates the *law enforcement ratio* (LE Ratio), using the formula correctly noted above, as a proxy measure for assessing law enforcement effectiveness. (It is employed, together with another country specific calculation to assess *rates of reporting* seizure cases to ETIS, to correct for bias in the data.) To derive the LE Ratio, seizures made by a country (those we call a ‘Seizure In’) reflect good law enforcement effort as illegal ivory was detected and seized. Ivory consignments which leave, pass through, or arrive in a country without being detected and seized (those we call a ‘Seizure Out’) reflect poor law enforcement. It is suggested in the CWCA paper that the LE Ratio calculation is biased against transit and destination countries presumably because they fall further along the trade chain. This important issue has been widely discussed by the TAG and addressed through a series of modifications in the ETIS analytical framework. It should be noted that, in the analysis to CoP17, if a country of destination had no opportunity to make a seizure because the consignment was actually seized prior to reaching the reported destination, then that particular case is *not* factored as a ‘Seizure Out’ when calculating the LE Ratio for the destination country. Further, if a country of transit had no opportunity to make a seizure (for example, because of Customs agreements or transport logistics), such records are excluded from the LE Ratio calculation for these transit countries. Consequently, ETIS has taken steps to ensure that the LE Ratio reflects a country’s performance where an opportunity for taking law enforcement action occurred. ETIS continues to examine this issue and to evolve as appropriate to ensure that transit or destination countries are not prejudiced by the manner in which the LE Ratio is calculated.

*1.2 As a result of the aforementioned, a large amount of double or triple counting of seizures occurs in both TRANSACTION INDEX and WEIGHT INDEX, which amplifying rather than adjusting bias. It should be understood with great caution.*

Comment: Firstly, as explained above, the LE Ratio has been calculated in such a manner to minimize bias towards countries which serve as transit or destination points in ivory trade chains. For analytical purposes, the LE Ratio is lagged by one year so the bias correction is based on the previous year’s law enforcement performance, hence there is no double counting. Secondly, the ‘Transaction Index’ (TI) and the ‘Weight Index’ (WI) that are generated during analysis of bias-adjusted data are used to

measure different things. In the creation of these indices, each ETIS record is individually classified, firstly, as a raw or worked ivory seizure (combined cases are divided into their raw and worked ivory components and treated accordingly) and, secondly, then placed into one of three weight classes (small: <10 kg; medium: 10-<100 kg; large: 100+ kg). Using these variables, statistical modelling creates a series of bias-adjusted scores for each country in each of these categories. These scores collectively constitute the TI and can be shown in various aggregated forms. The TI assesses the number of ivory seizures a country is involved in as a relative measure of *frequency*. The WI assesses the quantity of ivory these seizures represent as a relative measure of *quantity*. There is no duplication because: a) each ivory seizure case is used only once in the process to create the indices; and b) the TI and WI are different metrics assessing different aspects of illegal trade in ivory. Accordingly, there is no 'double or triple counting' of seizures in ETIS.

*1.3 Number and quantity of seizures are shown in total, without differentiating seizures made in attempt to export from those in attempt to import. This separation is both basic and important. On one hand, huge ivory inventory held by non-range countries did enter into illegal trade, on the other hand, it is important to show the actual seizure spot.*

Comment: Although difficult to interpret, this point seems to refer to the summary statistics presented in Table 3 of CoP17 Doc. 57.6 (Rev. 1). If so, it needs to be understood that the data in Table 3 are used to explain -- but not create -- the results of the cluster analysis (for creation, see point 1.5). The Table 3 statistics represent the mean values of the aggregated data of all entities in each group and provide a relative basis for comparisons between the different clusters. In terms of differentiating the specific trade roles of individual entities in the clusters, this is done in the descriptive paragraphs for each group where source, export, transit and end-use destinations are typically noted. ETIS does capture trade chain dynamics, including where ivory originates and where it is seized, but the data presentation in Table 3 does not elucidate trade roles as a comparative factor. Finally, the evidence behind the statement: "*huge ivory inventory held by non-range countries did enter into illegal trade*" is not understood.

*1.4 The RAW IVORY EQUIVALENT (RIE) seems to imply that the worked ivory seizure comes from the illegal killing of ivory [sic] the same year. Some media did take it for granted. However, it is highly unlikely in the real world simply because it takes time to work ivory.*

Comment: The Raw Ivory Equivalent (RIE) calculation is a means to combine worked ivory with raw ivory to derive the relative quantity of ivory seized in a given year in a meaningful way. In fact, with very rare exception, ETIS has no way of assessing the age of the ivory seized, whether in raw or worked forms. It is recognized that the ivory reported to ETIS could potentially represent specimens obtained from elephants at an earlier point in time, possibly even decades prior to seizure. Because ivory stockpiles are certainly an ongoing source of ivory in illegal trade, ETIS alone is insufficient to track the situation facing elephants and that fact is precisely the reason for the CITES MIKE programme's focus on assessing the illegal killing of *in situ* elephants in real time. Further, it is

recognized that time lags between illegally killed elephants and their ivory tusks going into trade are not well understood and could be significant in some cases.

*1.5 The CLUSTER criteria are biased by average method. It blurred some fundamental information. The absence of large-scale illegal trade in ivory in Southern African countries and the prevalence of that in Eastern African countries together well explain the highly polarized fate of African elephant in the two regions from the perspective of trade impact. The key to solve the illegal ivory trade issue remains in Africa.*

Comment: Firstly, the criteria used to create the cluster analysis is not based on averages (see 'Forming the clusters' of CoP17 Doc. 57.6 [Rev. 1]). The clusters result from assessing each entity's TI profile (by ivory type in weight classes), and bias adjusted estimates of the total number and weight of ivory seizures over one tonne (raw and worked combined) that they have been involved in, and their total 'Seizure Out' and 'Weight Out' variables in the period 2012-2014. Using these criteria, countries or territories with the greatest ivory trade flows become separated from those which illustrate lesser involvement in the ivory trade, according to the ETIS data in this time period. This serves to prioritize those places where the greatest quantity of ivory is moving from, through, or to irrespective of their particular roles in the trade chain. Secondly, this general point is essentially about relating the ETIS (and presumably MIKE) results to wildlife (elephant) management policies in individual African countries. There are, perhaps, comparative statements that can be made at a sub-regional level, however, the ETIS analysis is focused upon individual CITES Parties as they constitute the primary unit of implementation under the Convention. Further, the CITES Parties recognize that the key to solving illegal ivory trade is a global (not just African) responsibility and this is reflected in ETIS.

*1.6 Concerned of the PRIORITY of illegal trade in ivory, Parties which met their reporting obligations under the Convention tend to be listed in higher priority, while Parties which did not meet their reporting obligations have a good chance of being listed in lower or no priority. To get a lower priority, Parties may choose to report fewer seizures as a response. It is a typical negative incentive mechanism and lose-lose situation.*

Comment: It is simply not accurate to allege that countries that report many ivory seizures become higher priorities for attention whilst those that report few or no ivory seizures are overlooked in the ETIS analyses. Most seizure cases provide information that implicate other countries in illicit ivory trade chains; further, subsequent forensic examination of ivory that is seized is also used to extend the trade chains of ETIS records to include countries of origin. In this manner, involvement in ivory trade becomes known even if countries rarely (or even never) make and report ivory seizures themselves. The ten countries/territories that constitute priorities of 'primary concern' in the CoP17 analysis made the following number of seizures over the three-year period 2012-2014: 3, 8, 10, 19, 21, 51, 248, 270, 287, 1,073. It is clearly evident that failure to report ivory seizures does not prevent a country from emerging as a priority owing to the methodological approach employed by ETIS.

*1.7 Based on data and information with at least two-year time lag, ETIS analysis fails to reflect the*

*status of ivory trade at national or global level of the year it is published. ETIS analysis should be adopted with caution and scrutiny when it is taken as a reference to instruct and deploy tasks of combating illegal trade in ivory.*

Comment: There is an unfortunate time lag with respect to the ETIS results, but resolution of that issue lies beyond the control of ETIS. Although Resolution Conf. 10.10 mandates that Parties report ivory seizure data to ETIS “*within 90 days of their occurrence*”, most CITES Parties take much longer to provide data. If ivory seizure data were received in a more timely manner, ETIS would be able to produce more current results. All Parties are encouraged to meet their ETIS reporting obligations under the Convention.

*1.8 ETIS report is inclined to analyze international illegal ivory trade, to be precise, the inter-continental one. It did not emphasize the intra-Africa flow of ivory, nor did it attempt to integrate the legal trade in ivory or the fluctuation of ivory stockpiles. So, ETIS report fails to display the picture of global trade in ivory in an overall and fair basis.*

Comment: It should be recognized that ETIS certainly *does* capture ivory trade flows within Africa. Indeed, 11 out of the 18 countries which are identified as priorities of ‘primary or secondary concern’ in the analysis to CoP17 are African countries, most of which are in this position as a result of intra-African ivory trade flows that are evident in the ETIS data.

## **2. Comments on ETIS Information**

The CWCA paper raises a number of issues concerning ETIS Information:

*2.1 Number of ivory seizures by country by year has not been shown in ETIS report by TRAFFIC since 2009. According to CoP15 Doc. 44.1 Annex, The number of reported seizures in Europe and America is three to four times that in Asia from 1989 to 2009.*

Comment: TRAFFIC hopes to issue a document at CITES CoP17 that will provide a summary of the number of ivory seizure cases by country by year used in the present analysis.

*2.2 It is a global commitment and priority to combat illegal ivory trade. There is no evidence that a steep decline in law enforcement efforts occurred in Europe or America since 2010. Also, there is no proof that an abrupt rise in law enforcement efforts occurred in Asia in the same period. Both of two give a rise to concerns about ETIS information credibility.*

Comment: As described above, the ETIS methods use a calculation of LE Ratio to correct for bias in the data and this is necessarily done on a national, not sub-regional, basis to reflect the efforts of individual Parties. ETIS is not aware of a ‘*steep decline in law enforcement effort in Europe or America*’ or ‘*an abrupt rise in law enforcement efforts ... in Asia*’ and it is unclear what evidence was used to make this assertion.

*2.3 Number of ivory seizures by country by year is a summary or aggregation of data by ETIS, so it is not relevant to data privacy. It is fundamental of ETIS analysis and should be attached as annex to ETIS report, like what was done before 2009.*

Comment: This point is addressed by the comment in point 2.1 above.

*2.4 ETIS information has two sources. One is authority reports and the other NGO reports. They are combined without declaring the percentage of both sources. Combating illegal trade is a sort of law enforcement action conducted by authorities. NGO reports highly rely on media or anecdotes. It is determined that authority report is much more reliable than that of NGOs.*

Comment: All ETIS records are scored for the reliability of sources (A to C) and the completeness of information (1 to 3), which is fully described in CoP12 Doc. 34.1. In the analysis for CoP17, 96% of the seizure records used came from government authorities and carried the highest ranking (i.e. 'A') for reliability of source. Only 4% of the records used came from other sources, but these records were also subjected to a validation process and are considered to meet an equivalent standard.

*2.5 It is understandable that ETIS information has a lag in time, which is mainly due to the management mechanism of the Parties. However, the lag is not fixed by presenting best information available. For example, it is well-known that two large-scale seizures were made in Thailand in 2015. As if it had not occurred, ETIS report in 2016 insisted in lowering Thailand's priority of illegal trade from Primary Concern to Secondary Concern according to ETIS information in 2012-2014. Meanwhile, ETIS report claimed that this achievement came from the excellent performance of National Ivory Action Plan, which starting from 2014.*

Comment: ETIS fully acknowledges time lags in the data as mentioned in point 1.7 above. ETIS analyses are expensive to undertake, require external funding, and can only be done effectively if there is 'critical mass' in terms of the seizure data for a given year. For the CoP17 analysis, it was recognized that certain seizure events had transpired in 2015, but overall data for that year remained insufficient to undertake a credible analysis. ETIS analyses are not designed -- nor would it be appropriate -- to address data falling in years that are not properly assessed. Finally, the prospect of a country dropping out of one cluster analysis as a country of 'primary concern' only to re-emerge (perhaps in a different role) in another is entirely possible as each iteration is based upon a new three-year set of seizure data. Finally, the ETIS analysis to CoP17 certainly notes the significant progress that Thailand has made in terms of implementation of its National Ivory Action Plan but does not establish causality for the change in its position as a priority country in the ETIS analysis.

*2.6 ETIS information is inconsistent in different reports and papers. For example, in ETIS report to SC66 in JAN 2016, it is claimed that 2013 is the peak year of illegal ivory trade since 1989. In ETIS report to CITES CoP17 in APR 2016, the peak year is switched to 2012. If a large amount of data about seizures in 2012 and 2013 were collected by ETIS during JAN to APR in 2016, explanation should be given in time about the change in result.*

Comment: Over the years, various ETIS outputs have produced somewhat different results but this is to be expected because new information is coming into ETIS all of the time, including new seizure records, forensic results that extend trade chains and revisions to existing records that may relate to events that occurred many years earlier. Thus, iterative presentations of the ETIS data reflect ongoing developments and it should not be surprising that new/different data produce new/different results. Because the analysis describes illegal trade trends, an additional year of data may update the estimate of the overall trend. That said, it is observed that the ETIS results have remained remarkably consistent over the years. Concerning the identification of ‘peak years’, with one report claiming 2013 whilst a subsequent report says 2012, it should be noted that all of the ETIS trend analyses render confidence intervals and the best estimate of the trend in any given year is the bold dot, which generally serves as the speaking point to describe the overall trend. However, the actual trade could theoretically fall at any point within the confidence interval, but the average is the best estimate, a point we consistently communicate to the CITES Parties. In this regard, ETIS strives to be transparent concerning apparent increases or decreases in levels of trade, especially where overlapping confidence intervals are evident. With respect to 2012 and 2013, only minor shifts in the data actually led to the changing status of these two years as depicted in the Transaction and Weight Indexes; their confidence intervals continue to overlap and ETIS describes the trend as remaining at ‘*unacceptably high levels*’ whether the highest point is 2012, 2013, or even potentially 2014.

### **3. Comments on Suggestions**

The CWCA paper offers nine suggestions to improve the operation of ETIS:

*3.1 TO PRESENT ILLEGAL IVORY TRADE by listing the number of seizures by country and by year together with three annotations listed below:*

*for self-seizure cases, the percentage of export attempt and import attempt*

*for implicated cases, the percentage of being an origin and being a destination*

*for information sources, the percentage of authority report and non-authority report*

Comment: Resolution Conf. 10.10 mandates the objectives of ETIS and the outputs to CITES CoP17 are presented in a manner that addresses those particular issues. Further, ETIS believes that bias-adjusted data are required to meet the objectives established by the CITES Parties. It is recognized that the three proposed ‘annotations’ above would constitute summaries of the raw data at hand, but could not be used to describe illegal trade for the reasons outlined in the paper on the analytical methods of ETIS. Further, with respect to the content of the first ‘annotation’, in addition to illegal export or import, seizures of ivory can also occur as a result of violations of possession, sale, offer for sale/purchase or the illegal killing of elephants. With respect to the content of the second proposed ‘annotation’, in addition to countries of origin or destination, seizures of ivory can also occur in countries of export, re-export, transit or in end-use markets. Thus, these proposed ‘annotations’ would only partially describe the data.

*TO ADOID [sic] RAW DATA NOISE by sticking to officially reported seizure data, making a declaration on why non-authority data should be involved and how to verify it, and notifying the Parties involved whenever a non-authority report is cited.*

Comment: Firstly, ETIS is engaged in a constant effort to validate seizure cases with the Parties. Secondly, ETIS periodically provides all of the ETIS data that relates to a country (both ‘Seizures In’ and ‘Seizures Out’, those seizures in which the country is implicated in) through its CITES Management Authority in the form of an ETIS Country Report. At such times, CITES Parties are requested to review their data and inform ETIS if they have any comments or issues with any particular seizure case. Finally, mechanized data checking and cleaning programmes are employed to detect inadvertent errors in the data. These ongoing validation procedures ensure that the ETIS records that are used in analytical outputs represent high quality data.

*3.2 TO IMPROVE DATA-COLLECTING METHOD by establishing a standardized online data collecting form to facilitate reporting and to shorten the time lag of seizure data to an acceptable degree.*

Comment: ETIS has produced standard data collection forms that are available from the CITES website. ETIS is working to establish an on-line facility so that all Parties will be able to access and download their ETIS data whenever they need it, as well as upload new seizures including multiple cases at a single time. This effort to date was made possible with external funding from the U.K.’s Darwin Initiative, who is gratefully acknowledged for their support of this important effort. However, any such facility must operate in both English and French languages at a minimum, and preferably Spanish too, so that all of the languages of the Convention are accommodated. Whilst the English version is completed, further work on the French version is required to complete the job, whilst the Spanish translations have not commenced. Frankly speaking, it has been difficult to move this effort forward to completion, but development and launching of an on-line ETIS facility remains a future goal. Additional funding is being solicited and interested CITES Parties are invited to consider supporting this initiative.

*3.3 TO REVIEW SUBSTITUTIVE INDICATORS by applying the indicator of “seizure in/(seizure in + seizure out)” only to origin country in bias adjusting and by removing this indicator from non-origin country.*

Comment: This issue has been addressed in point 1.1 above and seems to be based upon a misunderstanding concerning the calculation of the LE Ratio. Bias adjustment is indeed an important necessity with respect to all of the ETIS data and there is no logical reason for only applying the LE Ratio exclusively to countries of origin.

*3.4 TO LABEL IVORY INVOLVED IN TRADE BUT IRRELEVANT TO ILLEGAL KILLING by fully understanding that some Parties have put in place national laws stricter to CITES regulation and by evaluating its effect on global seizure information.*

Comment: What constitutes an ivory seizure is a function of national laws in each country. Such laws are necessarily nuanced and different in each country. As ETIS operates as part of an international Convention, the prerogative of individual countries to determine the precise nature of what constitutes the legal grounds for an ivory seizure to occur within their own jurisdiction is accepted. The suggestion made in this point goes against the spirit of CITES which allows countries to exercise stricter domestic measures at their own discretion.

*3.5 TO INTEGRATE IVORY FLOW DATA by taking the legal trade in ivory and the fluctuation in ivory stockpiles into account to build a systematic thinking about the whole picture of global ivory flow.*

Comment: Another institution, UNEP-WCMC, has a long history of tracking legal ivory trade through the CITES Trade Database. As a monitoring system, ETIS is focused on illegal trade and thus there is no reason to duplicate the UNEP-WCMC role. On the other hand, ETIS is presently developing a subsidiary database on ivory stockpiles and recognizes that such stocks are potentially a source of ivory in trade, both legal and illegal.

*3.6 TO ESTABLISH A ROBUST ANALYTIC MODEL by inviting experts in economics and mathematics to join in the ETIS modelling. It is of crucial importance how to explain the change in output upon uncertainty of data input.*

Comment: ETIS, together with MIKE, shares a TAG that is comprised of individuals from a range of technical backgrounds. In this regard, economists, statisticians and other experts have been, and continue to be, engaged in the creation of the analytical framework of ETIS, which is continually on the agenda of every TAG meeting. Further, the ETIS reports that go into CITES CoPs are reviewed by the MIKE-ETIS TAG members before they are submitted to the CITES Secretariat; this process should be regarded as something akin to the peer review that scientific papers undergo prior to publication. ETIS already benefits from a robust, peer reviewed analytical model, and measures to refine and improve the system are under consideration all of the time. In species conservation, ETIS represents a model long-term monitoring system.

*3.7 TO FACILITATE INDEPENDENT ANALYSIS by outsourcing analysis work or simply offering an online access to raw data to any third party which is interested in ivory trade research, just like the online CITES trade database, and by inviting a third party to evaluate the reliability and effectiveness of ETIS analysis.*

Comment: ETIS methods have been peer reviewed, are published in the scientific literature and remain available for anyone who wishes to check the analysis. ETIS has a data access policy, which was adopted at the 66<sup>th</sup> meeting of the CITES Standing Committee (see SC66 Com. 9) and is now slated for inclusion in Resolution Conf. 10.10 at CoP17 (see CoP17 Doc. 57.1 Annex 3 on Draft amendments to Resolution Conf. 10.10 (Rev. CoP16)). ETIS is obliged to operate within the policy framework that the CITES Parties have approved. Accordingly, there are instances whereby individual CITES Parties have authorized TRAFFIC to provide their datasets to third parties for analytical purposes and these requests have been positively acted upon.

*3.8 TO SET POSITIVE INCENTIVE CRITERIA by cracking down the extant negative incentive mechanism, and by shifting to a win-win situation that encouraging those Parties which positively take law enforcement and reporting responsibility and discouraging those Parties which negatively take law enforcement or reporting obligation.*

Comment: This suggestion appears to relate to a misunderstanding that countries which make and report many seizure cases to ETIS are penalized and disproportionately become priorities for attention. As described in point 1.6 above, this contention holds no basis in fact.

It is hoped that this response thoroughly addresses the issues raised in CoP17 Inf. 23. ETIS remains ready to answer any further questions if necessary.

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Submitted by Tom Milliken on behalf of the MIKE-ETIS TAG  
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