

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



Eighteenth meeting of the Conference of the Parties
Geneva (Switzerland), 17–28 August 2019

Species specific matters

Elephants (*Elephantidae* spp.)

ADDENDUM TO IMPLEMENTATION OF RESOLUTION CONF. 10.10 (REV. COP17)
ON TRADE IN ELEPHANT SPECIMENS

1. This document has been prepared by the Secretariat.
2. The present addendum contains information on developments since the submission of document CoP18 Doc. 69.1 on *Implementation of Resolution Conf. 10.10 (Rev. CoP17) on Trade in elephant specimens*.
3. In document SC71 Doc. 11 on the *National ivory action plan (NIAP) process*, the Secretariat highlights that in the implementation of Step 1 of the *Guidelines to the NIAP process* contained in Annex 3 to Resolution Conf. 10.10 (Rev. CoP17), it transpired that the current provisions in Resolution Conf. 11.17 (Rev. CoP17) on *National reports* and in Annex 1 to Resolution Conf. 10.10 (Rev. CoP17) create partly overlapping reporting requirements for Parties.
4. These overlapping reporting requirements can result in discrepancies in data used to inform decision-making. In document SC71 Doc. 11, the Secretariat highlights that one of the Parties concerned with the implementation of Step 1 of the *Guidelines to the NIAP process* reported some of its ivory seizures as part of its reporting on annual illegal trade in accordance with Resolution Conf. 11.17 (Rev. CoP17), but did not report these seizures to the Elephant Trade Information System (ETIS) as outlined in Annex 1 to Resolution Conf. 10.10 (Rev. CoP17). This led to discrepancies between the data reflected in the ETIS report prepared for the 18th meeting of the Conference of the Parties (CoP18, Geneva, 2019), and data provided to the Secretariat by the Party concerned.
5. Although the discrepancy in the case highlighted above did not affect the categorization of the Party concerned in the ETIS analysis, the Secretariat believes that it will be important for the Conference of the Parties to consider a way to address these overlapping reporting requirements and prevent similar future incidents.
6. For ease of reference, the reporting requirements established by the two Resolutions are briefly outlined in paragraphs 7 to 12 below.

Annual illegal trade reports

7. The Conference of the Parties, in paragraph 3 of [Resolution Conf. 11.17 \(Rev. CoP17\)](#), urges all Parties to submit an annual illegal trade report to the Secretariat each year in accordance with the report format distributed by the Secretariat, as may be amended by the Secretariat from time to time with the concurrence of the Standing Committee. Each annual illegal trade report should cover the period 1 January to 31 December of the year preceding the year in which it is submitted. The deadline for the submission of the report is 31 October each year. [Guidelines for the preparation and submission of the CITES annual illegal trade report](#) were agreed by the Standing Committee and made available to Parties.

8. The Conference of the Parties, in paragraph 3 of Resolution Conf. 11.17 (Rev. CoP17), directs the Secretariat to, unless otherwise specified by the reporting Party, share the data collected in the annual illegal trade report with the members of the International Consortium on Combating Wildlife Crime (ICCWC) to allow data to be used in ICCWC global research and analysis on wildlife and forest crime.
9. As a temporary measure and until a more permanent solution for the management and storage of CITES annual illegal trade data is agreed,¹ the Secretariat is currently drawing upon support from the United Nations Office on Drugs and Crime (UNODC) to compile CITES annual illegal trade data in its World WISE database² for use in global research and analysis studies on wildlife and forest crime by ICCWC.

ETIS reports

10. ETIS was established under [Resolution Conf. 10.10 \(Rev. CoP17\)](#) to track the trends in the illegal trade in ivory, and provide an information base to support decision-making on management, protection and enforcement needs of elephants. ETIS is managed and coordinated by TRAFFIC in collaboration with the ETIS Technical Advisory Group (TAG) and in collaboration with the CITES Secretariat.
11. The data reporting requirements for ETIS are outlined in Annex 1 of Resolution Conf. 10.10 (Rev. CoP17). Section 4 of Annex 1 specifies that all Parties, through their CITES Management Authorities, following liaison with appropriate law enforcement agencies, should provide information on seizures and confiscations of ivory or other elephant specimens in the prescribed formats either to the Secretariat or directly to TRAFFIC within 90 days of their occurrence. In addition, law enforcement agencies in States not-party to the Convention are requested to provide similar information.
12. A standardized methodology has been developed for the collection of ETIS data which was first circulated in Notification to the Parties No. 1998/10 of 31 March 1998. This is done through a number of mechanisms and formats, including direct online data submission to the ETIS website, using the [ETIS Data Collection Form](#) for individual seizure cases, or the ETIS Data Collection Spreadsheet for reporting multiple seizure cases at one time. Reporting on elephant product seizures or confiscations using other formats is also accepted. With reference to the data collection form, the minimum information required to enable data entry of a seizure case into ETIS is:
 - Source of data;
 - Date of seizure and the agency or authority responsible for the seizure;
 - Location of discovery;
 - Ivory type and quantity; and/or
 - Type and quantity of non-ivory elephant products.

In reporting ivory seizures, Parties are asked to pay particular attention to the need to identify the type of ivory involved. ETIS recognises three types of ivory: 'raw ivory', 'semi-worked ivory' and 'worked ivory', but for analytical purposes semi-worked and worked ivory are assessed together.

Main differences between annual illegal trade reporting and ETIS reporting

13. The table below reflects the main differences in the requirements and provisions in terms of the annual illegal trade reporting and the reporting to ETIS.

	Annual illegal trade reports	Reporting to ETIS
Species	Reporting on illegal trade and seizures concerning all CITES-listed species	Reporting on elephant ivory and non-ivory product seizures and confiscations
Purpose	To gather and record data on illegal wildlife trade involving CITES-listed species; to use and analyse such data to identify trends and support the implementation of	To record and measure levels and trends of trade in ivory and other elephant specimens; to assess whether and to what extent observed trends are related to measures taken under

¹ <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-036.pdf>

² https://www.unodc.org/documents/data-and-analysis/wildlife/Exsum_Wildlife_report_2016.pdf

	measures under CITES to address wildlife crime; to support Parties' decision-making and the development of appropriate law enforcement responses; and to support the production of the UN Sustainable Development Goals (SDG) indicator 'Proportion of traded wildlife that was poached or trafficked' (Target 15.7), for which CITES and UNODC are the custodian agencies.	CITES; to support Parties' decision-making; and to build capacity in elephant range States and Parties affected by illegal trade in elephant specimens to implement and make use of MIKE and ETIS in managing elephants and enhancing enforcement.
Reporting schedule	Once per year by 31 October	Within 90 days after the seizure
Data collection form	Standard format for the CITES annual illegal trade report	ETIS data collection form and spreadsheet The ETIS ivory and elephant product seizure data collection form captures detailed data specific to the seizure, and includes additional fields concerning ivory that are not included in the annual illegal trade report.
Guidelines to support reporting	Guidelines for the preparation and submission of the CITES annual illegal trade report	Explanatory notes for the ivory and elephant product seizure data collection form
Data use	Resolution Conf. 11.17 (Rev. CoP17) mandates the sharing of data submitted by Parties in their annual illegal trade reports with ICCWC for ICCWC-supported global research and analysis on wildlife and forest crime. The sharing of data with ICCWC is subject to approval by the submitting Party, that must indicate in its annual illegal trade report whether the data provided may be used by ICCWC. The Party does this by ticking the applicable box provided in the format for reporting. Sharing of data collected through the annual illegal trade report with others, for example ETIS, is currently not mandated.	Access to data is subject to the ETIS data access policy. Third parties must obtain permission from the Party that provided data to ETIS before ETIS can make such data available to the third party.

Matters that justify further consideration

14. As mentioned in paragraph 3 above, the current provisions of Resolution Conf. 11.17 (Rev. CoP17) and Annex 1 to Resolution Conf. 10.10 (Rev. CoP17) create partly overlapping reporting requirements for Parties. As shown in the table above, the schedule for reporting established by these two Resolutions does not align, and neither do the templates used for the different types of reporting. Apart from placing an unnecessary reporting burden on Parties, this could cause discrepancies in data used to inform decision-making.
15. Furthermore, as shown in the table, current data sharing provisions do not facilitate effective interaction. The mandate in paragraph 3 of Resolution Conf. 11.17 (Rev. CoP17) only provides for the sharing of data submitted by Parties in their annual illegal trade reports with the members of ICCWC, if the submitting Party agrees to this, but not for use for ETIS. Likewise, the ETIS data access provisions pose a challenge in gaining access to ETIS data for ICCWC global research and analysis on wildlife and forest crime, and in cases where, for example, the Secretariat commissions work from third Parties. One such example is the West and Central Africa threat assessment report available as Annex 4 to document CoP18 Doc. 34 on *Wildlife crime enforcement support in West and Central Africa*. The Secretariat commissioned UNODC to develop this threat assessment report and they experienced challenges in accessing ETIS data for the report.

16. Lastly, a proposal for the storage and management of CITES annual illegal trade data will be discussed at the present meeting.³ Receiving, verifying, processing and recording data gathered through the annual illegal trade reports of Parties entails significant work. Should it be agreed that data on illegal trade in ivory that is included in annual illegal trade reports submitted by Parties should be extracted for ETIS, the Secretariat notes that a database for the storage and management CITES annual illegal trade data would facilitate such work. However, in the absence of such a database, screening all annual illegal trade reports and extracting this data could be a time-consuming task placing a significant burden on the limited resources of the Secretariat.

Proposed way forward

17. The Secretariat notes that terms of reference for a review of the ETIS programme are proposed in Annex 4 to document CoP18 Doc. 69.1 for consideration by the Conference of the Parties. The Secretariat proposes that the matters raised in the present document be considered as part of this review, taking into account data-sharing policies, data storage and management, reporting timeframes, and reporting format.
18. Parties should continue to submit separate reports as required in terms of these resolutions until an appropriate solution is identified to address the overlapping reporting requirements under Resolution Conf. 11.17 (Rev. CoP17) and Resolution Conf. 10.10 (Rev. CoP17).

Recommendation

19. The Conference of the Parties is invited to adopt draft decision 18.AA as follows:

Directed to the Secretariat

- 18.AA The Secretariat shall include in the terms of reference for the review of the Elephant Trade Information System (ETIS) programme the issue of overlapping reporting requirements created under Resolution Conf. 10.10 (Rev. CoP17) and Resolution Conf. 11.17 (Rev. CoP17) and the challenges posed by the different data-sharing policies, and work closely with the consultants carrying out the review to identify possible solutions.

³ <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-036.pdf>