

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



Seventieth meeting of the Standing Committee
Rosa Khutor, Sochi (Russian Federation), 1-5 October 2018

MIKE and ETIS Subgroup

UPDATE ON ETIS IMPLEMENTATION

1. This document has been prepared by TRAFFIC.

Status of the elephant product seizures database

2. Covering the period 1989 to the present, the seizures database of the Elephant Trade Information System (ETIS) comprised 28,709 validated elephant product records as at 15 August 2018. Since the report presented to the MIKE-ETIS Subgroup at the 69th meeting of the CITES Standing Committee (MESG17 Doc.3) (28-30 November 2017, Geneva, Switzerland), 1,061 additional seizure records have been added to ETIS.

Data collection with the Parties

3. As reported to the 69th meeting of the CITES Standing Committee (SC69) and SC70, TRAFFIC remains concerned that the Parties are not submitting seizure data to ETIS in a timely manner. Bearing in mind that Resolution Conf. 10.10 (Rev. CoP17) recommends that the CITES Parties report elephant product seizure records to ETIS within 90 days of their occurrence, as of 15 August 2018, only 21% (n = 253) of the 1,184 records currently in ETIS for 2017 met this requirement. In fact, the average time for reporting seizures for 2017 was 230 days, with some cases taking as much as 518 days to be reported to ETIS. To ensure timely reporting for the ETIS analysis to CoP18, the CITES Secretariat issued Notification to the Parties No. 2017/074 of 14 December 2017 instructing all Parties to submit elephant product seizure data for 2017 by 31 March 2018 for inclusion in ETIS. Nearly half (n = 577) of the 1,184 records for 2017 were received after the cut-off date given in the CITES Notification, including data from Australia, China, Côte d'Ivoire, Czech Republic, Ethiopia, Egypt, France, Hong Kong, Italy, Kenya, Malaysia, Mozambique, South Africa, Tanzania, Thailand, United Arab Emirates, United Kingdom and Zimbabwe. These records collectively totalled over 15 tonnes of elephant ivory and, without any doubt, their absence from ETIS would have skewed the results of the next analysis considerably, possibly rendering it meaningless and the year 2017 'data deficient'. In fact, 15% of these late records (n = 176, weighing 179 kg) were received after the database was already closed for the upcoming CoP18 analysis, meaning these records are not being considered in the upcoming ETIS report to the next CITES CoP. The impact of late reporting is that the pivot from data collection to analysis becomes delayed and consequently TRAFFIC is unable to present a credible update of the trend in illegal ivory trade though 2017 to SC70. ETIS analyses require a considerable allocation of resources to conduct so it does not make sense to engage when so much outstanding data will compromise the validity of the ensuing results.
4. Finally, the issue of data completeness also remains a challenge. Large numbers of ivory seizure cases continue to be brought to TRAFFIC's attention by third Parties and open source accounts, but are not otherwise reported by CITES Parties even if they submit seizure data to ETIS. TRAFFIC

remains concerned that many seizure submissions fail to include all seizure cases that have occurred within a particular country. Further, attempts to validate these cases in correspondence with the relevant CITES Management Authorities, in many cases, has gone unanswered. TRAFFIC believes that ETIS would significantly benefit from a better understanding of data collection and the rate of reporting at the individual country level to improve understanding of the reported data.

Request to be considered by MESG18

5. To address the issue of ETIS data collection in general, TRAFFIC would like to undertake a formal assessment of the CITES Parties in terms of understanding a range of related topics. These would include knowledge of the law enforcement bodies in each country which have legal authority to seize ivory, and information on the presence or absence of national mechanisms for collecting, consolidating and reporting elephant product seizure data for submission to ETIS. Such an undertaking would most likely take the form of an electronic questionnaire designed to identify the authorities in each country who hold legal powers to make seizures, gauge current reporting and consolidation practices at the national level, and gain an assessment from individual Parties on whether or not they believe the seizure records held in ETIS accurately reflect the number of elephant product seizure cases made in their country. TRAFFIC would collaborate with the CITES Secretariat on the design, content and distribution of the questionnaire, and would report the findings of this initiative back to the MESG at a later date. The information and feedback received through such an initiative could point to capacity building and training programmes to address impediments presently inhibiting the timely reporting of seizure data to ETIS. TRAFFIC seeks the approval of the MESG to move forward with a review of ETIS data collection as described in this document. This is the second time TRAFFIC has asked the MESG to endorse this type of project.

Status of the ETIS subsidiary databases

6. Since SC69, and in preparation for the CITES CoP18 analysis, all 18 of the subsidiary databases of ETIS have been updated so that they hold the most recent time-based, country-specific data and were handed over to the ETIS statistician on 6 June 2018. These data will be tested to see if they will serve a useful purpose in correcting bias in the ETIS data that arises from differing rates of seizure and rates of reporting. In this regard, a range of proxy measures for considering law enforcement effort and effectiveness, rates of reporting, governance and corruption, and other related socio-economic factors are annually assessed, so that the ETIS analytical results presented to the CITES Parties more accurately reflect true levels of illegal ivory trade.

Meeting and Interactions with the CITES Parties

7. Since SC69, TRAFFIC participated in the MIKE Sub-regional Steering Committee Meetings for Asian Elephant Range States in Bangkok, Thailand on 29 April 2018, giving a presentation on ETIS and the status of the assembled countries in the illegal ivory trade. TRAFFIC took the opportunity to also distribute ETIS Country Reports, which are summary tabulations of all of the ETIS data that relate to individual countries, to Bangladesh, Bhutan, Cambodia, China, India, Indonesia, Lao People's Democratic Republic, Malaysia, Myanmar, Nepal, Sri Lanka, Thailand and Viet Nam. These countries were asked to review the data on their seizure profile in ETIS and to report back to TRAFFIC on any issues that may arise from any of the data that relates to them. So far, no feedback has been received from any of these countries.
8. TRAFFIC also attended the CITES National Ivory Action Plan Meeting in Maputo, Mozambique from 1–4 May 2018. This event, the first of its kind, drew together all but two of the current NIAP Parties, including Angola, Cambodia, Cameroon, China, Democratic Republic of Congo, Egypt, Ethiopia, Gabon, Hong Kong SAR (China), Kenya, Malawi, Malaysia, Mozambique, Nigeria, Philippines, Qatar, Tanzania, Thailand, Togo, Uganda, Viet Nam; only Congo and Lao PDR were absent. The purpose of the meeting was to review the NIAP experience to date, identify opportunities that promote long-term law enforcement co-operation and collaboration, share lessons learned and innovative approaches and define mutual technical assistance needs. TRAFFIC gave a presentation on ETIS and distributed ETIS Country Reports to all Parties present at the meeting, requesting feedback on any seizure cases for which accuracy could be an issue. To date, no feedback on the ETIS Country Reports has been received from any of the Parties who attended this meeting.

Production and dissemination relevant information, data and analysis on ivory trade issues

9. Since SC69, the only technical report relating to the ETIS data has been the contribution TRAFFIC made to SC70 Doc. 49.1 Annex on the *Status of elephant populations, levels of illegal killing and the trade in ivory: A report to the CITES Standing Committee*.

Status of the analytical framework for ETIS

10. TRAFFIC, working with Dr. Fiona Underwood, the lead statistician for ETIS, has continued to assess the analytical methods employed to derive trends and understand underlying factors behind the trade over time using ivory seizure data. For the CoP17 analysis in 2016, a redefinition of the law enforcement ratio (LE ratio), one of the variables used to adjust for bias in the data caused by different rates of seizures, was affected. In this regard, countries that were implicated in the trade chain of an illegal ivory transaction but did not have an opportunity to make a seizure were excluded from consideration when calculating the LE ratio. (To refresh, the LE ratio is calculated by dividing the number of seizures made by a country by the total number of seizures in which it has been identified as part of the trade chain whether it made the seizure or not). This development had the effect of reducing the number of seizures a country was implicated in especially if they primarily functioned as a transit or destination country as there is a greater probability that seizures will occur before they reach the end of the trade chain. Thus, for countries that serve as a destination at the very end of the trade chain, illegal ivory really only enters a country but almost never leaves it. For these countries, the law enforcement effort ratio is likely to be artificially high compared to a country that mostly plays the role of a country of origin or export even if the law enforcement capabilities of the two countries are virtually the same. This technical consideration was noted in a document that Singapore submitted to SC69 (see SC69 Doc. 29.3 Annex 5) and in the TRAFFIC/MIKE-ETIS Technical Advisory Group's (TAG) response (see SC69 Inf. 22). To address the issue of calculating a LE ratio so that destination countries are neither advantaged or disadvantaged, considerable exploratory analysis has been undertaken to find an equitable solution. Preliminary results suggest that understanding the proportion of seizures in which a country is identified as the country of origin, export, transit or destination could be part of the solution. The utility of using such information to help improve the bias adjustment in ETIS is under consideration and will be further examined at an upcoming meeting of the MIKE-ETIS TAG in 6–8 November 2018.

Implementation of SC69. Com. 11 requests to TRAFFIC

11. At the 69th meeting of the CITES Standing Committee (SC69), the Parties adopted SC69 Com. 11 which made the following request 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.*
12. To secure external funding for implementation of these requests, TRAFFIC submitted a funding proposal to the CITES Secretariat which was discussed at a meeting in Geneva in late March 2018.

This funding proposal was then finalized with work plans and budgets for each activity, and sent to the CITES Secretariat on 8 May 2018. Through Notification to the Parties No. 2018/068 of 19 July 2018, the Secretariat presented the funding request to the CITES Parties for consideration (see <https://cites.org/sites/default/files/notif/E-Notif-2018-068.pdf>). In the meantime, immediately following SC69, TRAFFIC is very pleased to note that the Belgium Government allocated a donation of EUR25,000 (USD30,792) to support the development of the on-line ETIS facility, and six months later the Belgium Government made another generous contribution of EUR45,000 (USD51,300). In another development TRAFFIC can draw upon secured funding of USD56,942 from existing projects with the European Union pursuant to EC Project No. FED/2014/342-884 to support some of these activities. Thus, of the total budget of USD262,442 that was requested, USD139,034 has already been secured. The balance of USD123,408 is still being sought. TRAFFIC would like to express its gratitude to the Belgium Government and the European Union for supporting the further development of ETIS.

Status of the ETIS budget

13. The ETIS budget for the period 1 July 2018–30 June 2019 (which corresponds to TRAFFIC's Fiscal Year 2019) will be submitted in a separate document.

Recommendations

14. The MIKE and ETIS Subgroup is requested to:
 - a. Note and consider the update provided by TRAFFIC; and
 - b. Consider the request to undertake the assessment referred to in paragraph 5 of the present document.