COVER PHOTO:
ROYAL MARINE SA80 RIFLES HANG ON A WALL ABOVE MEDICAL SECTION KIT READY TO BE GRABBED IN THE EVENT OF AN EMERGENCY, AT FORWARD OPERATING BASE GIBRALTAR IN AFGHANISTAN.
CREDIT: © CROWN 2009 / SGT. RUPERT FRERE
ROCKET-PROPELLED GRENADE, TWO SUB-MACHINE GUNS AND 84 ROUNDS OF AMMUNITION SEIZED DURING JOINT SECURITY OPERATION BY AMISOM AND SOMALI SECURITY SERVICES IN SOMALIA.

CREDIT: © UN PHOTO / STUART PRICE
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THE ATT MONITOR PROJECT

The ATT Monitor is a project of Control Arms.

The project was launched in January 2015 with the support of the governments of Austria, Australia, Ireland, Netherlands, Norway and Trinidad and Tobago.

The ATT Monitor serves as a trusted source of information on the implementation and compliance with the Arms Trade Treaty (ATT). This includes monitoring transfer data contained in Annual Reports and tracking measures to embed the Treaty’s obligations in national practice, such as the passing of new legislation and the development of national control systems.

The ATT Monitor produces credible qualitative and quantitative research and analysis, and explores emerging trends and practices that have an impact on the effectiveness of the Treaty and its provisions.

The ATT Monitor aims to:

• Synthesize information to advance the ATT’s universalization and implementation in a user-friendly format accessible to government policymakers, parliaments, civil society organizations, the media and the public.

• Promote and stimulate the sharing by countries and other actors of credible information on, and analysis of, the ATT’s universalization and implementation.

• Identify key challenges in advancing global acceptance of the ATT’s norms and its full implementation, and propose steps to ensure that these challenges are addressed.
AMMUNITION FROM MONUSCO FIREARMS TRAINING IN THE DEMOCRATIC REPUBLIC OF CONGO.

CREDIT: © UN PHOTO / ABEL KAVANAGH
STATE OF THE ARMS TRADE TREATY:
A YEAR IN REVIEW JUNE 2018–MAY 2019

This review covers the period between 1 June 2018 and 31 May 2019, up to and including the deadline for submission of the Arms Trade Treaty (ATT) Annual Reports.1 It explores some of the key events and milestones during the past year and assesses their impacts on the overall performance of States Parties to the Treaty regarding universalization and compliance.

This review first takes stock of universalization efforts around the world during the abovementioned period. It then considers the decisions and outputs of the Working Group on Treaty Universalization (WGTU), the Working Group on Transparency and Reporting (WGTR) and the Working Group on Effective Treaty Implementation (WGETI) which includes three subgroups on Articles 6 and 7, diversion and general implementation. Finally, the review looks at compliance with the ATT’s core provisions and assesses whether the cumulative actions have contributed to the Treaty’s objective of reducing human suffering.

UNIVERSALIZATION

As of 31 May 2019, 102 countries were listed as States Parties by the ATT Secretariat, and a further 33 were Signatories. For the first time, Treaty membership reached 100 States Parties and increased this year to account for more than half (53 per cent) of all United Nations (UN) member states.

Seven countries became States Parties to the ATT between 1 June 2018 and 31 May 2019: Brazil, Cameroon,2 Guinea-Bissau, Lebanon, Mozambique, Palau and Suriname.3 All of them ratified the Treaty. This is more than a 50 per cent rise in new membership when compared to the previous year4 and closely matches the universalization rate of 2016–2017.5

Even with new members, the geographic spread of States Parties remains uneven (see map). As of 31 May 2019, the regions with the lowest number of ATT States Parties were Africa (25 of 54 countries), Asia (seven of 14) and Oceania (five of 14). Europe (39 of 43 countries) and the Americas (26 of 35) have greater regional proportionality of States Parties.6

The ATT continues to enjoy particularly strong support among certain sub-regional blocs, such as:

- The European Union (EU), all of whose members are States Parties.
- The Economic Community of West African States (ECOWAS), with 14 of its 15 members (93 per cent) being States Parties.
- The Caribbean Community (CARICOM), with 12 of 15 members (80 per cent) being States Parties.7

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1 The ATT Secretariat extends a grace period of seven days to States Parties before a report is considered late, thereby setting a de facto deadline of 7 June 2019 for 2018 Annual Reports.
2 Cameroon ratified the ATT prior to CSP 2018 but missed the deadline for inclusion in analysis presented in the ATT Monitor Annual Report 2018.
3 Lebanon and Palau submitted their instruments of ratification, but the Treaty will not enter into force for them until after the deadline for ATT Monitor analysis. Botswana and Canada acceded to the ATT after the 31 May 2018 deadline for inclusion in ATT Monitor analysis. Their participation in the ATT as States Parties will be captured in next year’s ATT Monitor report.
7 CARICOM (N.D.). ‘Membership’. http://caricom.org/membership. One of the members of CARICOM, Montserrat, is not a UN member state and so is not a State Party to the ATT.
RATIFIED/ACCEDED: Albania, Antigua and Barbuda, Argentina, Australia, Austria, Bahamas, Barbados, Belgium, Belize, Bosnia and Herzegovina, Brazil Benin, Bulgaria, Burkina Faso, Cameroon*, Cape Verde, Central African Republic, Chad, Chile, Costa Rica, Côte d’Ivoire, Croatia, Cyprus, Czech Republic, Denmark, Dominica, Dominican Republic, El Salvador, Estonia, Finland, France, Germany, Georgia, Ghana, Greece, Grenada, Guatemala, Guinea, Guinea-Bissau, Guyana, Honduras, Hungary, Iceland, Ireland, Italy, Jamaica, Japan, Kazakhstan, Latvia, Lebanon, Lesotho, Liberia, Liechtenstein, Lithuania, Luxembourg, Macedonia, Madagascar, Mali, Malta, Mauritania, Mauritius, Mexico, Moldova, Monaco, Montenegro, Mozambique, Netherlands, New Zealand, Niger, Nigeria, Norway, Palau, State of Palestine, Panama, Paraguay, Peru, Poland, Portugal, Republic of Korea, Romania, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Samoa, San Marino, Senegal, Serbia, Seychelles, Sierra Leone, Slovakia, Slovenia, South Africa, Spain, Suriname, Sweden, Switzerland, Togo, Trinidad and Tobago, Tuvalu, United Kingdom, Uruguay, Zambia.

NOT YET JOINED: Afghanistan, Algeria, Armenia, Azerbaijan, Belarus, Bhutan, Bolivia, Botswana, Brunei Darussalam, Canada, China, Cuba, DR Congo, Ecuador, Egypt, Equatorial Guinea, Eritrea, Ethiopia, Fiji, Gambia, India, Indonesia, Iran, Iraq, Jordan, Kenya, Kuwait, Kyrgyzstan, Laos, Maldives, Marshall Islands, Micronesia, Morocco, Myanmar, Nepal, Nicaragua, North Korea, Oman, Pakistan, Papua New Guinea, Qatar, Russia, Saudi Arabia, Solomon Islands, Somalia, South Sudan, Sri Lanka, Sudan, Syria, Tajikistan, Timor-Leste, Tonga, Tunisia, Turkmenistan, Uganda, Uzbekistan, Venezuela, Vietnam, Yemen.

SIGNED: Andorra, Angola, Bahrain, Bangladesh, Burundi, Cambodia, Colombia, Comoros, Congo (Republic of), Djibouti, Gabon, Haiti, Israel, Kiribati, Libya, Malawi, Malaysia, Mongolia, Namibia, Nauru, Philippines, Rwanda, Sao Tome and Principe, Singapore, Swaziland, Tanzania, Thailand, Turkey, Ukraine, United Arab Emirates, United States of America, Vanuatu, Zimbabwe.

* Cameroon ratified the ATT prior to CSP 2018 but was not included in analysis presented in the ATT Monitor Annual Report 2018.
National and regional training workshops around the world brought together civil society organizations (CSOs) and representatives from different countries to explore technical challenges and legal requirements of membership to the ATT. Examples include:

- In Paraguay, at a meeting of the Mercosur working group on firearms and ammunition, representatives from embassies, police forces, INTERPOL and disarmament agencies from eight Latin American countries discussed the role of the ATT amid the need for a legal framework that can reduce human suffering caused by the trafficking of small arms.

- In Nepal, Parliamentarians and civil society representatives from six countries attended the second United Nations Regional Centre for Peace and Disarmament in Asia and the Pacific (UNRCPD) Workshop for South Asia on Gun Violence and Illicit Small-Arms Trafficking from a Gender Perspective, which looked to strengthen control of illicit small arms and light weapons (SALW) and to empower women to participate in such efforts. The ATT and other relevant treaties and instruments were promoted by UN officials.

- In Jordan, officials from eight countries attended a five-day professional training course on all arms-control instruments, including the ATT, that focused on the specific security context of the Middle East and North Africa region.

- In Australia, officials and CSO representatives from 18 countries attended the three-day Pacific Conference on the ATT, hosted by Australia and New Zealand. Participants discussed updates on the process of ratification and implementation in the Pacific region, identified implementation challenges faced in-country and discussed solutions.

Activities in support of universalization efforts have also continued this past year. Mechanisms like the United Nations Trust Facility Supporting Cooperation on Arms Regulation (UNSCAR), the EU ATT Outreach Project and bilateral assistance initiatives have continued to provide resources to channel technical, material and financial assistance to States Parties and countries in the process of ratifying or acceding to the Treaty.

Among these funding mechanisms, UNSCAR grants were disbursed for the sixth year to a range of UN agencies, international and regional organizations, CSOs and research institutes. These include the Centre for Armed Violence Reduction, Control Arms/Nonviolence International, the Geneva Centre for Security Policy and UNRCPD.

This year saw the second funding cycle of the ATT Voluntary Trust Fund (VTF). It is intended to support national implementation of the Treaty and relies on voluntary contributions to make up its entire disbursement budget. The ATT encourages each State Party to contribute resources to the VTF. As of the second Informal Preparatory Committee (PrepCom) meetings of the Conference of States Parties 2019, 20 States Parties had made voluntary contributions totaling US$78 million.

The ATT Secretariat received 23 applications for 2018 VTF-funded projects. It approved funding for 10 projects to be implemented in 9 countries in 2018, with a combined total budget of US$840,003. This marks a decrease from the 17 projects approved for 2017 VTF funding. Many of these projects were organized with CSOs as implementation partners, reinforcing the vital role partnerships play in meaningfully advancing universalization and implementation efforts.
SYSTEMS AND PROCEDURES

The Fourth Conference of States Parties (CSP 2018) was attended by 111 countries, including 77 States Parties, two states that ratified the Treaty but for whom it had not yet entered into force, 22 Signatories, and eight observer states.

Also attending the conference were representatives of seven international and regional organizations, including UN agencies, 34 member organizations of the Control Arms Coalition, and 31 other CSOs, research institutes and associations representing industry. Ambassador Nobushige Takamizawa served as the President of the Conference.

Procedural decisions adopted included the following:

- Deciding to discuss and consider the possible expansion of the membership of the Management Committee during the informal preparatory process of CSP 2019.
- Tasking the ATT Secretariat and the Management Committee to implement administrative measures to address some of the causes of delayed and non-payment of assessed contributions.
- Appointing Australia, Chile, Finland, Germany, Japan, Madagascar, Mauritius, Mexico, the Netherlands, New Zealand, Norway, South Africa, Sweden, Switzerland and the United Kingdom to serve on the VTF Selection Committee for two years, from CSP 2018 to CSP 2020.
- Entrusting the administration of the ATT sponsorship programme to the ATT Secretariat from CSP 2018 onwards.
- Electing Ambassador Jānis Kārkliņš of Latvia as President for CSP 2019.
- Electing Benin, Chile, Ireland and the Republic of Korea as Vice Presidents for CSP 2019.
- Setting the date for CSP 2019 as 26–30 August 2019.

Two informal preparatory meetings to develop an agenda and working plan for CSP 2019 were held in January and April 2019. Working groups met prior to these meetings.

The WGGETI, chaired by Switzerland, continued to address the implementation of specific ATT articles in dedicated sub-working groups on Article 5 (general implementation), Articles 6 and 7 (prohibitions and export assessment), and Article 11 (diversion). These discussions included an increased number of States Parties that shared concrete examples of their experiences with implementation of the Treaty. During discussions on Article 5, Benin and Liberia gave presentations on their experiences in establishing national control authorities. In discussions on Articles 6 and 7, Serbia and South Africa shared information on export-control systems, licensing processes and risk assessment. The CSP President’s chosen theme of gender and gender-based violence ensured time was given to discussion on Article 7.4. Many States Parties contributed to discussions on the need to consider risk assessment obligations specific to GBV in Article 7.4, while Control Arms, the International Committee of the Red Cross and the International Human Rights Clinic at Harvard Law School introduced resources to inform and support that conversation. During discussions on Article 11, Bulgaria shared experience in managing import documentation, and the United Nations Institute for Disarmament Research shared research on how effective end-use and end-user controls can prevent diversion. The WGGETI concluded with a special session during which States Parties showed strong support for the creation of a new dedicated sub-working group on Article 9 (transit and transshipment).

The WGTR, co-chaired by Mexico and Belgium, highlighted the decreasing rates in reporting in the submission of Annual and Initial Reports. Serbia presented on challenges faced in reporting, and ATT stakeholders discussed reasons reporting rates are in decline. The Stimson Center spoke to the role of industry in supporting reporting efforts, and the co-Chairs called on ATT stakeholders to provide assistance to States Parties facing challenges to reporting. The WGTR also discussed the ATT Secretariat’s new IT platform, as well as the new reporting templates available for online submission of reports.

The WGTU, co-chaired by Finland and Japan, welcomed new States Parties to the Treaty, as well as the Treaty universalization efforts undertaken. It celebrated Mozambique’s ratification of the Treaty as its 100th State Party. The WGTU discussions focused on the development of a Universalization Toolkit and Welcome Pack for new and prospective States Parties, with an emphasis on translation and other elements of the toolkit that would ensure wide availability and accessibility to all states.

Informal PrepCom meetings for CSP 2019 were held on 1 February 2019 and 5 April 2019. Ambassador Jānis Kārkliņš of Latvia, President to CSP 2019, opened the first PrepCom meeting with a panel to introduce gender and gender-based violence as the theme of the Latvian Presidency. Ambassador Kārkliņš introduced the President’s paper on gender and arms-related gender-based violence, which covered the issues of gender balance in representation, the gendered-impact of armed violence and conflict and gender-based violence and risk assessment under Articles 6 and 7.25 This paper was updated for the second PrepCom meeting for CSP 2019 to include elements for possible adoption by the CSP.26 Both papers received widespread support from all ATT stakeholders. Also discussed at the PrepCom meetings ahead of CSP 2019 was the increasing problem of financial liquidity due to the significant problem of unpaid contributions, whereby Ambassador Kārkliņš announced his decision that States Parties who have not yet fulfilled their Treaty financial obligations will not have voting rights at CSP 2019.

Overall, the informal preparatory meetings ahead of CSP 2019 contained more substantive discussion and produced more constructive outputs (for example, guidance documents, toolkits and working papers) than in previous years. Additionally, the sharing of concrete experiences of implementation of Treaty obligations was a standard feature of some working groups, along with more open dialogue regarding concerns and challenges. This marks a positive shift. However, it is notable that States Parties remained reluctant to discuss compliance with, and possible violations of, the ATT in terms of transfer decisions. This raises questions regarding the likely long-term effectiveness of the Treaty, as robust compliance depends, in part, on States Parties developing their understanding of what does and does not qualify as legitimate trade in arms.

26 Ibid.
REPORTING ON IMPLEMENTATION AND COMPLIANCE

INITIAL REPORTS

As of 31 May 2019, 94 of 102 States Parties were required by Article 13.1 of the ATT to submit their Initial Reports on implementation. Of these 94, 70 had done so as of June 2019. This represents a compliance rate of 74 per cent.

In the time since the ATT Monitor 2018 Annual Report, three States Parties – Kazakhstan, the State of Palestine and Tuvalu – have submitted Initial Reports to the ATT Secretariat. All three elected to keep their reports private on the ATT Secretariat's website.

Though States Parties are only required to complete an Initial Report once within the first year of the entry into force for them, Article 13.1 requires them to provide the ATT Secretariat with relevant updates or changes to their national arms-transfer control systems. So far, only two States Parties have provided these updates to the Secretariat (Japan and Sweden). This lack of updated information stymies efforts towards comprehensive Treaty implementation and undermines the value of transparency in national control systems. The WGTR could explore barriers States face when it comes to updating Initial Reports. An in-depth analysis of the contents of these reports can be found in Chapter 3.2.

ANNUAL REPORTS

As of the 31 May 2019 deadline, 92 States Parties were required by Article 13.3 of the ATT to submit their 2018 Annual Reports. Of these, only 45 States Parties had submitted their Annual Reports on time, a compliance rate of approximately 49 per cent. For comparison, at the same time last year, there was only a 40 per cent compliance rate. The 9-point increase suggests a positive increase in compliance with the reporting obligations in the Treaty when compared with previous years. A preliminary analysis of the contents of these reports can be found in Chapter 3.1.


TAKING STOCK – DID STATES PARTIES LIVE UP TO THEIR OBLIGATIONS?

Arms transfers that contribute to violations of international humanitarian law (IHL) and international human rights law (IHRL) continue to flow into conflict and armed-violence situations, resulting in casualties of civilians, widespread displacement and human suffering on a large scale. States Parties to the ATT continue to transfer arms to the warring parties in Yemen, despite extensive documentation of the connections between arms transfers and IHL and IHRL violations in reports by the UN, international and research organizations and CSOs.29

For example, the UN Panel of Experts on Yemen noted this year that “there have been widespread violations of international humanitarian law and international human rights law by the various parties involved in the [Yemen] conflict. The coalition air strikes and the indiscriminate use of explosive ordnance by Houthi forces continued to disproportionately affect civilians and civilian infrastructure.”30 This poses important questions for States Parties in their efforts to implement the ATT, as they have obligations to deny transfers if there is an ‘overriding risk’ that the arms to be transferred could be used to ‘commit or facilitate’ a serious violation of IHL and/or IHRL violations.


The conflict in Yemen remains one of the most concerning cases in which arms transfers have continued despite information about the clear risk of IHL and IHRL violations. An initial survey of data from the 2018 Annual Reports indicates that exports of arms have continued to take place to countries where risk of misuse of arms is apparent and credible information about the misuse is available. As effective implementation of the Treaty increases, it would be expected that such transfers would decline.

There are encouraging signs that some States Parties are actively implementing and amending national policies and procedures that increase compliance with ATT obligations. Several, including the Belgium (Government of the Flanders Region), Greece and the Netherlands, have partly or totally suspended arms sales to Saudi Arabia and the United Arab Emirates. Other States Parties, such as Austria, Ireland, Sweden and Switzerland, have put in place restrictive measures on exports to Saudi Arabia.

Other actions have been taken to increase ATT compliance. For example, there are a number of legal challenges to transfers of arms at risk of being used in the Yemen conflict that are currently working their way through national courts in a number of States Parties, such as Belgium, France, Italy and the UK. Though not specific to the ATT, this legal challenge reflects attempts to affect change that moves governments further towards compliance with ATT obligations.

As States Parties progress in their efforts to implement the ATT in accordance with its object and purpose of reducing human suffering, the ongoing humanitarian crisis in Yemen creates an urgent need for States Parties to discuss their obligations in relation to Articles 6 and 7, and challenge those who are potentially violating the Treaty.
THE 2019 ATT MONITOR REPORT

Chapter 1 focuses on the obligation of States Parties to consider gender-based violence (GBV) during risk assessment, picking up the President of CSP 2019’s choice of gender and GBV as the priority theme for this year’s CSP. It gives an overview of gender representation in the ATT process in relation to wider moves in UN disarmament processes to prioritize gender equality. It then discusses challenges around the identification of the problem of GBV, which includes the spectrum of definitions of the term, acts that are considered to be GBV, weapons that need to be considered for a GBV risk assessment, the meaning of ‘commit’ or ‘facilitate’ with regard to GBV, and challenges to identifying the full extent of GBV. It examines the specific GBV provisions in the ATT and explores how States Parties can properly operationalize them. It illustrates existing practice by States Parties based on interviews with licensing officials from a range of states and considers two scenarios as illustrations of a GBV risk assessment process.

Chapter 2 takes an in-depth look at 2017 ATT Annual Reports. It includes an overall analysis of reporting practices, comparing 2016 and 2017 ATT Annual Reports. This identifies changes in reporting practices and assesses whether inconsistencies and gaps identified in the ATT Monitor analysis of 2016 ATT Annual reports were resolved in the 2017 ones.

Chapter 2.2 includes country profiles for each State Party obliged to submit a 2017 ATT Annual Report. Each profile provides data on key reporting practice metrics (public reporting, timely reporting, withholding security information), as well as a summary of areas of good reporting practice and areas for improvement. The profiles also contain a summary of transfers reported by each State Party, focusing on basic comparable information such as number and status of export/import partners, and highlighting the largest transfers reported by that State in 2017.38

Chapter 2.3 first provides an overall analysis on the extent to which reported exports and imports are comparable within these reports (for example, if one State Party reported an export of assault rifles to another, did the second State Party also report a matching import?). Second, it provides examples of reporting practices and different sources of information provided by States Parties within reporting templates that make it difficult to compare data from one report with another. Third, it provides recommendations drawn from the Stimson Center’s ATT Baseline Assessment Project (ATT-BAP) on steps that can be taken by States Parties to provide comprehensive, accurate and comparable information in Annual Reports that allow a bigger picture of the global arms trade to emerge.

Chapter 3.1 includes a summary assessment of Annual Reports submitted for arms exported and imported during 2018 before 31 May 2019.39 It is anticipated that more States Parties will submit their report in the window between the legal deadline of 31 May and the beginning of CSP 2019. As such, this analysis will be further expanded in next year’s ATT Monitor report.

Chapter 3.2 includes a summary assessment of Initial Reports and updates to them submitted by States Parties as of June 2019. From this assessment comes an analysis of reporting non-compliance, highlighting challenges States Parties face in fulfilling reporting obligations.

38 In 2017 Annual Reports, States Parties reported authorized or actual exports and imports of conventional arms from 1 January 2017 to 31 December 2017.

39 Reports are considered on time if they are published on the ATT Secretariat web site as of 7 June 2019 (one week after the deadline set out in Article 13).
ALLISON PYTLAK OF WILPF, NETTA GOUSSAC OF ICRC, OLIVER SPRAGUE OF AMNESTY INTERNATIONAL, ANNA CROWE OF IHRC AT THE CENTRAL AND EASTERN EUROPEAN REGIONAL TRAINING ON GENDER-BASED VIOLENCE.

CREDIT: © CONTROL ARMS / RALUCA MURESAN
CHAPTER 1: GENDER, GENDER-BASED VIOLENCE AND THE ARMS TRADE TREATY

The ATT is the first legally binding global instrument to recognize the connection between arms transfers and gender-based violence (GBV), and to create legal obligations to prevent serious GBV violations being committed with weapons. To meet these obligations, States Parties must individually and collectively develop mechanisms to apply the provisions of the Treaty. At the first Working Group and Informal Preparatory Committee (PrepCom) meetings of the Fifth Conference of States Parties (CSP 2019), States Parties showed a notably increased willingness to participate in discussions around gender and GBV, and to a greater level of specificity than had previously been the case. This was due in part to the choice by Latvia’s CSP 2019 presidency of gender and GBV as the priority theme for this year’s CSP.

The main developments on this issue at the second Working Group and PrepCom meetings of CSP 2019 included the updated recommendations in the President’s Paper – which saw limited substantive discussion but did not result in opposition – and the introduction of papers by the International Committee of the Red Cross (ICRC) and the International Human Rights Clinic (IHRC) at Harvard Law School. There remains, however, an uneven understanding among States Parties of what constitutes or facilitates an act of GBV, the ways in which the ATT addresses GBV and how GBV can be incorporated into Articles 6 and 7 risk assessment obligations. Engagement on the topic has also been uneven. Overall, the increased discussion by a relatively small number of States Parties has not yet translated into meaningful widespread acceptance or action by Treaty members as a whole.

This chapter seeks to fill gaps in the knowledge of States Parties, civil society and other stakeholders. It brings together the extant research in this emerging policy area, so as to illustrate the range of interpretations available to States Parties wishing to implement the ATT rigorously. It includes discussions on:

- Gender representation in the ATT process
- Challenges around the identification of the problem of GBV
- GBV provisions in the ATT
- Operationalizing GBV commitments in the ATT
- Existing practice by States Parties
- Hypothetical scenarios that illustrate the risk assessment process
- Recommendations for implementation

REPRESENTATION AND GENDER DIVERSITY IN DISARMAMENT AND ARMS CONTROL

At the United Nations General Assembly (UNGA) First Committee in October 2018, Latvia announced formally that gender and arms-related GBV would be the official theme of its presidency of CSP 2019. Representation is one of three core issues of its focus in this regard. On the same occasion, UN High Representative for Disarmament Affairs Izumi Nakamitsu emphasized that taking gender into account will not only “have positive benefits for women, but of equal importance, a gender sensitive approach to disarmament will have positive impacts for the field as a whole.” In ATT Resolution A/C.1/73/L.8/Rev.1, the UNGA First Committee duly encourages States Parties and Signatories “to ensure the full and equal participation of women and men in pursuing the object and purpose of the Treaty and its implementation.”

5 Quoted in Ibid.
These developments in the ATT indicate the beginnings of the take-up of the call by UN Secretary General António Guterres in 2018 for greater efforts to achieve “equal, full and effective participation of women in all decision-making processes related to disarmament.” They also build on Operative Provision 1 of UN Security Council Resolution 1325 of 2000, which “urges Member States to ensure increased representation of women at all decision-making levels in national, regional and international institutions and mechanisms for the prevention, management, and resolution of conflict.” These stated goals aim to address the chronic gender imbalance in representation in disarmament issues, in which women comprise, on average, between 20 per cent and 32 per cent of participants at arms control, non-proliferation and disarmament meetings. The smaller the overall numbers of participants at meetings, the greater the proportion of men.

**GENDER-BASED VIOLENCE AND THE ARMS TRADE**

**DEFINING GENDER-BASED VIOLENCE**

The ATT requires States Parties to take into account the risk of weapons being used to “commit or facilitate serious acts of gender-based violence or serious acts of violence against women and children.” Beyond this, the Treaty text does not define GBV or differentiate it from violence against women and children. States Parties thus face the challenge of defining GBV in order to prevent its occurrence and facilitation through the use of weapons.

There are various definitions of GBV. The Women’s International League for Peace and Freedom (WILPF) defines it as “violence that is directed at a person based on discriminating norms and practices relating to her or his specific sex or gender identity.” Control Arms defines it as “violence that is directed against a person on the basis of gender or sex.” For the International Committee of the Red Cross (ICRC), it is “violence against persons, whether male or female, because of their sex and/or socially constructed gender roles.” Sources for these definitions include the Committee on the Elimination of Discrimination Against Women (CEDAW), the UN Declaration on the Elimination of Violence Against Women and the International Criminal Court’s Office of the Prosecutor.

These sources are often focused on ending violence against women (VAW). However, while they are often conflated in policy, GBV and VAW are not the same. VAW is defined by the UN Declaration on the Elimination of Violence Against Women as “physical, sexual or psychological harm or suffering to women, including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or in private life”, in or by the family, community or state. The declaration recognizes that “some groups of women … are especially vulnerable to violence,” including “women belonging to minority groups, indigenous women, refugee women, migrant women, women living in rural or remote communities, destitute women, women in institutions or in detention, female children, women with disabilities, elderly women and women in situations of armed conflict.” This list is not exhaustive, and while it acknowledges the variety of vulnerabilities women face and the way ethnic and racial difference, socio-economic status and other factors can compound the violence experienced by women, it does not mention the violence experienced by women who are lesbian and/or transgender (perhaps alongside one of these other categories as well).

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15 Ibid.
The concept of GBV, in contrast, includes violence against women who identify as heterosexual women. It broadens the scope of concern to include a wider spectrum of sex, gender and sexuality so as to avoid the assumptions of heterosexuality and that everyone identifies with the gender they were assigned at birth (known as ‘cis-gender’), and to include men as gendered beings. Paying attention to gender brings into view not only those people who identify as heterosexual, but also lesbian, gay and bisexual, transgender, intersex, gender-fluid, gender non-conforming or queer people. In this understanding of gender as a social construction, it is also crucial to understand that gender relations shape, and are shaped by, other social relations. This includes, for example, race, ethnicity, class, caste, religion or belief, and sexual orientation. The interaction of race, gender, class, sexuality, disability, and other axes of lived experience in ways that compound discrimination and violence necessitates ‘intersectional analysis’ of these relations cumulatively rather than separately. Paying attention to gender in an intersectional way gives a richer understanding of how power operates in society and greater leeway to prevent human suffering caused by violations of international humanitarian law (IHL) and international human rights law (IHRL) – a core goal of the ATT.

People who identify as women and girls are the main known or recognized victims of GBV. However, men and boys can also be victims. Most acts of violence – across countries, cultures and types of society – are committed by men, and men and boys make up the greatest proportion of firearm deaths and injuries. However, women and girls are more likely than men and boys to die as a result of intimate partner violence and are also often targeted specifically on the basis of their sex or gender, and suffer harms of violence related to their social roles. This means they suffer relatively disproportionate harm on the basis of their gender. Women and girls can also commit violence, including GBV. Lesbian or gay men, women, boys and girls also face GBV on the basis of their sexuality, and transgender, non-binary and queer people face it on the basis of their gender non-conformity.

The fact that violence can be perpetrated against men and boys on the basis of their gender or sex, and the growing recognition of transgender, non-binary and queer rights, are what differentiate definitions of GBV from those of VAW. During the ATT negotiations, civil society activists argued that “the broader concept of GBV is important for capturing violence perpetrated on the basis of sex, sexuality, gender identity, or transgression of gender norms, rather than only against a specific sex.” As the Geneva Declaration put it, “Focusing on gender rather than women” allows this broader spectrum of harm to be captured and a “gender-sensitive approach highlights the power relations inherent in much armed violence.”

There are clearly different interpretations of gender across states, shaped by politics, religion and custom, as well as different levels of willingness to consider gender as a social relation. During the ATT negotiations, there was opposition to the inclusion of any reference to GBV, with some states preferring the term VAW. The Treaty text of Article 7.4 now includes reference to both. These differences between states notwithstanding, the ICRC is clear that “idiosyncrasies in understandings of the definition do not prevent State Parties from conducting the required risk assessments in line with their respective understandings of the term ‘gender’.”

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20 Control Arms (2018). ‘How to use the Arms Trade Treaty to address gender-based violence.’ op cit. p. 4
22 Ibid.
27 Acheson and Butler, ‘WPS and Arms Trade Treaty,’ op cit., p. 691.
WHAT IS CONSIDERED GENDER-BASED VIOLENCE?

GBV includes "acts that inflict physical, mental or sexual harm or suffering, threats of such acts, coercion and other deprivations of liberty." The term GBV is an umbrella term for "any harmful act that is perpetrated against a person’s will and that is based on socially ascribed gender differences." GBV exists on a spectrum that includes not just sexual and physical violence, but also socio-economic, emotional and psychological violence. These forms of violence may vary across countries in the nature and extent of specific types, and are severely underreported in most, if not all, countries. Underreporting is itself a manifestation of gender inequality. This requires States Parties to take proactive efforts to identify forms of GBV prevalent in recipient countries and to take steps to prevent its commission or facilitation with weapons. GBV occurs in all countries, in and outside of armed conflict, in the home and in the public sphere.

As mentioned above, GBV can be perpetrated against women and girls, but also against men and boys, and against those who defy gender norms of heterosexuality and cis-gendering. While it is linked to social attitudes that perpetuate gender inequalities and discrimination against women, GBV is also a mode of social control. That is, GBV is a means of asserting, reinforcing and maintaining gendered power in society, and affects people of all gender identities, in varied ways. For example, while women may be targeted on the basis of the valorization of their reproductive role within communities and societies, men can also be targeted for violence and be forced to become perpetrators.

Examples of GBV include domestic and intimate-partner violence, forced and early marriage, honor crimes, harmful traditional practices, and practices of sexual violence such as rape, forced pregnancy, sexual exploitation, enforced prostitution, sex trafficking and sexual slavery — whether these practices are committed against males, females or non-binary people. GBV therefore also includes homophobic and transphobic violence, which may be physical or psychological.

To optimize best practice, States Parties should continue to develop their own definitions of GBV and share with others their information sources and operationalization plans. Since the announcement by the Latvian presidency that gender and GBV would be the thematic focus of CSP 2019, there has been a significant upsurge in interest in discussing GBV by States Parties. Discussion has been enabled by the Working Group on Effective Treaty Implementation (WGETI) facilitator of Articles 6 and 7 sub-group and CSP 2019 President, giving time to the issue in the sub-working group meetings and both PrepComs. This interest is promising, but there is also a challenge as this is a new area for many states to integrate into arms transfer decision-making.

WHAT WEAPONS NEED TO BE CONSIDERED FOR GENDER-BASED VIOLENCE RISK ASSESSMENTS?

GBV takes a variety forms across different contexts, some of which are officially recognised as war or armed conflict, others of which are officially deemed to be peaceful. GBV takes places inside and outside the home in all these contexts. It can be committed or facilitated with or without weapons including, but not limited to, those within the full scope of the ATT.
It has already been recognized within the ATT process that the impact of weapons use is gendered – that is, “there are significant differences in the impact experienced by people because of their gender.”\(^37\) For example, men and boys constitute the majority of owners and users of weapons, and they form the most numerous and direct fatalities and casualties of warfare and armed violence.\(^38\) Yet women and girls are impacted in terms of displacement, health, sexual violence, intimate partner violence and coercion situations of armed conflict and armed violence as well as at times of ostensible peace. They are also more likely to remain in the home even where direct threats from weapons have been identified, because of restrictions on their freedom of circulation and discriminatory gender norms.\(^39\)

In countries not officially recognized as experiencing armed conflict, there is an ‘inverted relationship’ between the rate of lethal violence and proportion of female victims – that is, “countries with high rates of lethal violence generally have proportions of female violence below the global average of 16 per cent, whereas the reverse is true of countries with low violent death rates.”\(^40\)

Given the wide range of forms of GBV and the different ways it can be committed or facilitated with weapons, States Parties to the ATT are required to assess the risk of GBV or serious acts of violence against women and children being committed or facilitated by the full scope of weapons covered under Articles 2.1, 3 and 4. That means that States Parties must assess the potential that battle tanks, armoured combat vehicles, large-calibre artillery systems, combat aircraft, attack helicopters, warships, missiles and missile launchers, small arms and light weapons (weapons covered by Article 2.1) will be used in this way, as well as ammunition and munitions fired, launched or delivered by these (Article 3), and parts and components that provide the capability to assemble these (Article 4).

### UNDERSTANDING WHAT ‘COMMIT OR FACILITATE’ MEANS IN THE CONTEXT OF GENDER-BASED VIOLENCE

States Parties have to take into account the risk of weapons being used to ‘commit or facilitate’ GBV. The inclusion of facilitation expands the application of the ATT beyond some of the other extant arms transfer control regimes in operation around the world and requires States Parties to broaden their understanding of the potential negative effects of weapons transfers. International law requires ATT States Parties to interpret Treaty terms in light of “their ordinary meaning, the context in which they are used, and the treaty’s object and purpose.”\(^41\) This means that ‘commit’ should be interpreted as ‘to perpetrate or carry out’ and facilitate as to make easier.”\(^42\)

Weapons can be used to ‘commit’ serious acts of GBV when they are used directly to inflict these harms. This can include, for example, the launching or firing of a weapon such as a rocket or bomb, or the discharge of a firearm. State actors that use guns to kill or injure women, men, or lesbian, gay, bisexual, transgender and intersex (LGBTI) individuals because of their gender identity “are committing acts of GBV that amount to a serious human rights violation.”\(^43\) Weapons can be used to ‘facilitate’ serious acts of GBV when they are used indirectly in ways that enable these harms to happen, which means the weapons “may be one or more steps removed from the actual violation”.\(^44\) Conventional weapons facilitate GBV “by emboldening the weapon holder and subduing the victim and by exacerbating the harm caused by the act,” such as when the threatening presence of a gun wielded by police or military forces facilitates rape by preventing resistance from victims.\(^45\) Other examples of weapons being used to facilitate serious acts of GBV include small arms and light weapons (SALW) being used by state or private personnel to guard a facility where rape and torture are perpetrated. Such examples illustrate that weapons covered by the ATT can contribute to the commission of violence, even when they are not directly being used to perpetrate it. Therefore, the risk of weapons being used to facilitate such acts needs to be assessed.

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37 CSP5 President, ‘Working Paper presented by the President of the Fifth Conference of States Parties to the ATT,’ op cit.
42 Ibid.
43 Ibid. p. 7.
44 Control Arms, ‘How to use the Arms Trade Treaty to address gender-based violence.’ op cit. p. 15
There are no hard boundaries between practices of committing and facilitating serious violations. These terms exist on a spectrum. While the discharge of a firearm can be a direct commission of GBV (for example, when used in acts of femicide), firearms are also regularly used to threaten even if they are not discharged (for example, in cases of intimate partner violence, to facilitate rape or in rounding up women during protests). The presence of a gun in a home in which intimate partner violence is perpetrated makes that violence more severe, even when the weapon is not directly or physically used in traditional ways.\(^\text{46}\) Given the language in the ATT of ‘commit or facilitate’, States Parties do not need to worry about drawing a hard distinction between the terms, but rather should make their risk assessments with this broader spectrum of practices in mind.

### Challenges to Identifying the Full Extent of Gender-Based Violence

According to the World Health Organization, 35 per cent of women worldwide have experienced physical and/or sexual violence by a partner, or sexual violence by someone other than a partner.\(^\text{47}\) Yet, GBV is challenging to identify and assess for four inter-related reasons:

1. Systematic underreporting
2. Knowing what to measure and how
3. Lack of disaggregated data
4. Risk of further harm to GBV survivors from generating interview, testimony or other qualitative data

Control Arms’ ‘Practical Guide for Risk Assessment’ gives examples of indicators of GBV and sources States Parties can consult. For example, the use of weapons in intentional killings, particularly of women and of children, in and outside of situations of armed conflict, is one good focus for States Parties to assess the prevalence of GBV. Indicators for this include overall homicide rates, and rates disaggregated by gender and by instrument of killing, such as firearms. Sources to consult include the UN Office of Drugs and Crime, Small Arms Survey, the UN High Commissioner for Human Rights (OHCHR), reports of the UN Secretary General, national criminal datasets, and national and local casualty counting groups.\(^\text{48}\)

As States Parties develop their implementation practices, they will need to refine their national data collection processes and work collectively to generate shared understandings. The CSP President is clear that “gender disaggregated data and research on the gendered impact of armed violence and conflict are both important in demonstrating the link between gender norms and the ways in which conflict increases the risks of gender-based violence and violence against women.”\(^\text{49}\)

One avenue States Parties can pursue, as suggested by the UN Gender Champions, is to mainstream gender into national and local criminal and public health policies. This would enable the collection of sex-disaggregated data on the impacts of armed violence, GBV and conflict.\(^\text{50}\)

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\(^{48}\) Control Arms. ‘How to use the Arms Trade Treaty to address gender-based violence.’ op cit. p. 8

\(^{49}\) CSP5 President. ‘Working Paper presented by the President of the Fifth Conference of States Parties to the ATT.’ op cit., p. 4.

\(^{50}\) International Gender Champions Disarmament and Control Arms. ‘Gender in the Arms Trade Treaty’ op. cit.
PUTTING GENDER-BASED VIOLENCE COMMITMENTS IN THE ATT INTO PRACTICE

RISK ASSESSMENT IN ARTICLES 6 AND 7

GBV commitments must be implemented by States Parties in relation to both Articles 6 and 7. As certain acts of GBV constitute violations of international law, States Parties are required to consider GBV in their implementation of Article 6.3. Specifically, a State Party is prohibited from authorizing any transfer (not just export) of arms, ammunition, parts or components "if, among other things, it knows that the items in question would be used to commit war crimes." Examples of sexual violence, a type of GBV, that constitute war crimes in both international and non-international armed conflict include, but are not limited to, rape, sexual slavery, enforced prostitution, forced pregnancy and enforced sterilization. GBV is not limited to sexual violence, however. Other serious violations of IHL that constitute war crimes may also constitute acts of GBV in certain circumstances. These violations include willful killing, direct attacks against civilians not taking a direct part in hostilities, and violence to the life and person of those protected by Common Article 3 of the Geneva Conventions, as well as the unlawful recruitment and use of children in hostilities.

If a proposed transfer is not prohibited under Article 6, exporting States Parties must carry out a risk assessment under Article 7 that includes specific attention to GBV and violence against women and children. Article 7.4 states that the exporting State Party, in making its export assessment, "shall take into account the risk of the conventional arms covered under Article 2.1 or of the items covered under Article 3 or Article 4 being used to commit or facilitate serious acts of GBV or serious acts of violence against women and children." The aim of Article 7.4 is not to create a stand-alone criterion in export assessments additional to the risks outlined in Article 7.1. Rather, it is to ensure that an exporting State Party takes into account this risk when conducting its export assessment outlined in Article 7.1. If, as a result of a robust risk assessment and taking into consideration any mitigation measures, a State Party determines that there is an overriding risk of the negative consequences listed under Article 7.1, it must deny the export. The value of an explicit requirement to consider GBV is that it reduces the historical tendency to overlook it and promotes consideration of specific mitigation measures that may be required with respect to GBV compared to other, more visible violations.

The ICRC gives examples of serious violations of IHL that involve violence against persons on the basis of their sex and/or socially constructed gender roles. One is sexual violence, against anyone of any gender identity, including rape, sexual slavery, enforced prostitution, forced pregnancy and enforced sterilization. Others include unlawful killings on the basis of gender in the context of armed conflict, such as the mass killing of military-age males to prevent them participating in hostilities, targeting of individuals because of sexual orientation and targeting of girls for attending school.

The IHRC at Harvard Law School suggests that serious violations of international human rights law (IHRL) are determined by "the character of a violation (its gravity) and the extent of the harm suffered by victims." This is a relatively low threshold that requires a holistic case-by-case assessment – that is, one "taking context into account, rather than focusing on an incident in isolation." Crucially, harm or violations need not be widespread to be serious. GBV perpetrated by state actors such as military, security and police forces, as well as failure by a state to take "adequate measures to prevent GBV by private actors", constitute serious violations of IHRL.

53 Ibid.
54 Ibid.
55 UN, Arms Trade Treaty, op. cit., Article 7.4
58 Ibid.
60 Ibid.
61 Ibid.
ASSISTING STATES PARTIES TO IMPLEMENT THE ATT

States Parties implement the ATT through national laws and policies. The Treaty instructs them in what they have to do, but not how to do it. As accession to and implementation of the ATT develop further, States Parties have the opportunity to initiate implementation of previously under-addressed Treaty provisions, such as GBV, as well as to refine their existing laws and policies and share best practices through CSPs, training and other mechanisms. Several NGOs and research centres have produced best-practice guides.

Control Arms identifies four stages to an effective, rigid risk assessment:

Stage 1 is to identify what types of GBV are recognized as violations under Article 6.3 or Article 7.1 of the ATT.

Stage 2 is to identify which of these violations are prevalent in the recipient state, the state’s capacity to prevent and punish acts of GBV committed by public and private actors, and whether the arms and items to be transferred, their end-use and the end-user are legitimate under the ATT.

Stage 3 is to identify whether arms, ammunition, parts or components would be used to commit GBV as a violation under Article 6.3, or could be used to commit or facilitate a violation under Article 7.1.

Stage 4 is to identify whether mitigating measures or other approaches satisfactorily and significantly reduce the relevant Article 7.1 risks identified in Stage 3. If there is an overriding risk not adequately addressed by mitigating measures, the transfer must be denied.

This overview of the stages of effective risk assessment is complemented by other resources detailing specific elements of the risk assessment process. For example, the ICRC provides detailed and useful guidance and indicators for assessing the risk of weapons being used to violate IHL or IHRL. The IHRC at Harvard Law School provides guidance on interpreting GBV as a serious violation of IHRL. WILPF has published tools and guidance for effective implementation of the ATT’s GBV provisions.
CURRENT PRACTICE AMONG STATES PARTIES TO THE ATT

To understand how states are implementing Article 7.4 of the ATT, interviews were conducted with licensing officials from States Parties. Of the eleven States Parties from around the world approached for interview, Australia, France, Germany, Ireland, the Netherlands, Poland and Sweden were able to respond. While no states from the global South were in a position to participate, the snapshot provided here illustrates some of the similarities and differences in existing practice that can serve as a baseline for further discussion. One initial commonality to be noted is that several States Parties expressed support for the Latvian presidency’s initiative to make gender and GBV the theme of CSP 2019. States Parties also expressed an interest in finding out how other states respond to the challenge of assessing GBV risks, so as to develop practices to implement the ATT to its fullest.

There is a spectrum of definitions of GBV between States Parties. Some, such as Ireland or the Netherlands, focus on violence committed or directed against a person because of their gender – that is, not specifically to people who identify as women. The Netherlands draws its definition from CEDAW and the European Institute for Gender Equality. It acknowledges that both women and men experience gender-based violence, but that the majority of victims are women and girls. German policy proceeds on the basis of the 1993 UN Declaration on the Elimination of Violence Against Women. While this source focuses on violence against women, in practice German policy recognizes that GBV also applies to men and boys. So does Swedish policy.

Other States Parties focus specifically on VAW. Several (for example, Australia, Poland and Sweden) draw their definition of GBV in part from CEDAW. Poland supplements this with a definition from the Council of Europe Convention on preventing and combating violence against women and domestic violence (the Istanbul Convention). Sweden uses a definition of men’s violence against women that corresponds to CEDAW, Council of Europe, EU and other definitions, which focus on violence directed at women or girls because of their gender, or violence that affects women and girls disproportionately. France works on the basis of UNSCR 1325 and its emphasis on “special measures to protect women and girls from GBV especially rape and sexual abuse in armed conflict.”

While none of the States Parties interviewed include specific mention of sexuality or gender identity in their definition of GBV, in the Netherlands, LGBTI rights are part of the human rights analysis that is carried out as part of risk assessments.

67 The Irish definition is derived from COSC, the Irish National Office for the Prevention of Domestic, Sexual and Gender-Based Violence: http://www.cosc.ie/en/COSC/Pages/WP08000147.
72 UN Security Council, Resolution 1325, op cit.

WHILE NONE OF THE STATES PARTIES INTERVIEWED INCLUDE SPECIFIC MENTION OF SEXUALITY OR GENDER IDENTITY IN THEIR DEFINITION OF GBV, IN THE NETHERLANDS, LGBTI RIGHTS ARE PART OF THE HUMAN RIGHTS ANALYSIS THAT IS CARRIED OUT AS PART OF RISK ASSESSMENTS.
There is broad agreement among States Parties interviewed that Article 7.4 applies to the full scope of weapons covered by the ATT, coupled with a focus on SALW as the most relevant or likely type of weapon to be used in GBV. No State Party has to date denied arms export licences on the basis of GBV, and interviewees found it difficult to imagine a scenario in which GBV would be the main reason for a denial. While GBV may be a factor in a negative human rights situation, GBV has not been the sole or primary reason for a denial by any states interviewed. Denial is usually connected to a broader human rights or humanitarian problem, to diversion or to conflict.

For several EU member states, GBV assessments are conducted as part of the Criterion 2 assessment under the European Council Common Position defining common rules governing control of exports of military technology and equipment 2008/944/CFSP (Common Position), which addresses human rights and IHL risks.73 This has the advantage of being able to integrate GBV into human rights assessments. A Swedish official explained that one central condition of Sweden’s national guidelines is an overall assessment of human rights in the recipient state. Such an assessment includes gender-specific violations. In Polish practice, every aspect of IHL, including GBV, is analysed on a case-by-case basis as necessary. However, Officials from other States Parties interviewed explained that it is hard to identify GBV-specific violations outside of other human rights and IHL violations. There are challenges around identifying GBV, generating GBV-specific data and isolating GBV as a risk factor that is named as a reason for denial. The view amongst licensing officials interviewed was that in practice, when the threshold of overriding risk is met in an assessment, it seems to be met before GBV is taken into account.

States Parties’ different experiences of how to assess GBV risks illustrate that gender can either be seen as a subset of IHL and IHRL or centrally integrated into assessments through a gendered analysis. This raises practical questions for States Parties about how to conduct gendered risk assessments that take into account the breadth of scale and types of GBV, in particular those that do not obviously meet the threshold of a serious violation of IHL or IHRL, and the challenge of underreporting. One example was raised in relation to arms exports to the Saudi-led coalition for use in the war in Yemen. A licensing official from one of the States Parties interviewed explained that its officials rely on sources such as the UN Panel of Experts for their memos to decision-makers, and that such sources often do not include mention of gender or GBV. It is up to independent experts to define the focus of their investigations and as such, licences are refused on general IHL grounds without any mention of GBV or the gendered impacts of weapons. Reflecting on this example, the question that is left for States Parties is whether they are approving any licences that pose a serious GBV risk where there are no other serious risks of IHL or IHRL violations.

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The significance of the ATT as a means of tackling GBV is that it provides states with a legal basis through which the risk of GBV needs to be assessed at a national level. In the case of the Netherlands, the ATT process also generated increased civil society attention to GBV. While the government was already conducting human rights assessments prior to the entry into force of the ATT, civil society advocacy led to a commitment by the government to inform parliament whenever it denied a license because of the risk of GBV. Reflecting the fact that all EU member states are States Parties to the ATT, the user’s guide to the Common Position was updated in 2015 and now incorporates a reference to ATT Article 7.4 as one of the elements to consider when forming a judgment under Criterion 2 of the Common Position, as explained by Germany. However, the 2019 review of the Common Position did not (at the time of writing) generate consensus to incorporate stand-alone GBV-specific language, so GBV will continue to be covered by Article 2 of the Common Position.

Most States Parties interviewed allocate the responsibility for assessing GBV risks to export control officials in the ministry responsible for issuing licences or to ministries that feed into the decision-making. Most do not have gender experts within export control teams. In the Netherlands, however, officials take advice from a gender taskforce in cases where there are concerns. In Germany, GBV analysis comes from input from the Federal Foreign Office where concerns are identified. Although there is no direct daily input into German weapons licensing issues, there is a network of gender experts in the different divisions of the Federal Foreign Office, as part of gender mainstreaming efforts. In Sweden, assessment officials at the Inspectorate of Strategic Products (ISP) and staff of the export control group of the Ministry of Foreign Affairs have received training from the Swedish Red Cross, civil society women’s rights organization Kvinna til Kvinna and others on feminist foreign policy, GBV and gender aspects of IHL. They have also engaged in discussion of the practical application of Article 7.4. In Poland, officials involved in the export control system undergo different kinds of training, some of which cover different aspects of IHL, including GBV.
Common sources for assessing GBV risks are ministries’ geographical desks and embassy reports, intelligence, UN and international organization reports, media analysis and NGO reports. This represents a mix of public and classified information similar to that used for human rights assessments in general. However, no State Party interviewed asks importing entities for information or context about GBV as part of its standard licensing practice. French practice acknowledges the challenge of underreporting and uses national sources such as embassies and ministries’ geographical desks to bring to the attention of export officials acts of GBV where they may be isolated and have not yet been brought to public attention by media or civil society organizations. In Poland, risk assessment processes use open-source information from NGOs to verify IHL violation signals alongside information from embassies and geographical desks of the Ministry of Foreign Affairs. Such open-source information is useful especially in cases where the presence of Polish or international officials on the ground is not possible or is difficult to arrange. German practice includes the most explicit effort to address the challenges of underreporting of GBV. The Human Rights and Gender division of the Federal Foreign Office issues embassies with instructions and catalogues of questions regarding human rights and GBV, and encourages them to gather data not just from human rights organizations in the country of destination but also specifically from women’s rights defenders. In this way, analysis from embassies is usually gender-sensitive. Embassies are instructed to consult regularly with women’s rights defenders (in safe spaces, as they are often under heightened scrutiny and potential threat) and actively support them to strengthen ties and build a basis of trust. This is a good example of an effort to generate data without subjecting GBV survivors to further harm.

There are some areas where state practice is not yet very developed, including mitigating measures. While some States Parties interviewed consider training and education to be mitigating measures, others do not have specific measures to put mitigation into effect. Another issue is the ATT language of ‘commit or facilitate’. For most States Parties, this is considered a legal issue, but the difference between facilitating and committing is not integrated into risk assessment.
PUTTING COMMITMENTS INTO PRACTICE: 
TWO HYPOTHETICAL CASE STUDIES

To illustrate how States Parties can implement the risk assessment process in relation to GBV, this section considers two hypothetical case studies of export licensing decisions for handguns to two states, Country A and Country B. SALW pose specific and frequent GBV risks and hence are used for illustrative purposes. However, risk assessment must be carried out across the full scope of weapons covered by the ATT.

COUNTRY A

BACKGROUND

An arms manufacturer submits an arms export licence application to the government of the country from which it wishes to export 1,200 handguns to the security forces in Country A. Country A has a higher than average human-development ranking for countries in its region. However, it has more gender-based inequalities in health, empowerment and economic status than most comparator countries, and it has a high rate of violence. In recent years, the homicide rate has been approximately 20 per 100,000 people. The violence is partly due to organized criminal gangs that operate with relative impunity due to weak rule of law. The justice system is known for being slow-moving, unpredictable and corrupt. Guns are widely available in Country A, and approximately 13 per cent of civilians own one. In addition to large quantities of firearms that are imported each year, there is also substantial smuggling of arms and ammunition, according to NGOs focused on this issue.

RISK ASSESSMENT

As identified earlier, there are four stages to a rigorous risk assessment.

Stage 1: Identify what types of GBV are recognized as violations under Article 6.3 or Article 7.1 of the ATT.

Prior to conducting risk assessments of licence applications, states should compile a list of types of GBV that are recognized as violations under Article 6.3 or Article 7.1, using the background resources indicated above.

Stage 2: Identify which of these violations are prevalent in the recipient state.

Country A has disproportionately high gender inequality and high rates of violence. Domestic violence is prevalent, femicide is on the rise and the trafficking of women is a significant problem. These harms are worse for migrant, poor and indigenous women. Social attitudes normalize GBV and tend to result in stigmatization of the victim rather than in consequences for the perpetrator. GBV is likely to be underreported due to an awareness that law enforcement officers share dominant cultural attitudes that position women as socially subordinate and stigmatize women who seek to escape abusive relationships. Furthermore, soldiers and organized criminal gangs are rarely held accountable for GBV. The proposed export would be going to a district rife with gang violence, which is significant as gang violence in Country A coincides with even higher rates of GBV.

The risk assessment should then consider Country A’s state capacity to prevent and punish acts of GBV. The proposed export would be going to the security forces, which have been implicated not only in failing to prevent GBV but in actively perpetrating it against vulnerable groups. For instance, there are credible reports that soldiers deployed to fight armed insurgent groups in poor, indigenous areas have raped indigenous women with impunity.

The existence of laws to prevent and punish GBV is not uniform throughout Country A, which has a federal structure that leads to some sub-national jurisdictions having much stronger anti-GBV laws than others. Even assuming that the export is going to a district with stronger laws, implementation of anti-GBV laws is poor and law enforcement is generally weak in Country A.

Furthermore, members of the security forces who perpetrate GBV tend to do so with impunity. UN human rights treaty bodies’ reporting confirms that Country A lacks state capacity in this regard, as it has failed to uphold its commitments under CEDAW with regard to preventing and punishing acts of GBV committed by members of the security forces. Overall, state capacity to prevent and punish acts of GBV is weak. The risk assessment should then examine whether the items to be transferred, their end-use and the end-user are legitimate under the terms of the ATT.
Stage 3: Assess whether arms, ammunition, parts or components would be used to commit GBV as a violation under Article 6.3, or could be used to commit or facilitate a violation under Article 7.1.

In the case of Country A, the exporting state does not have knowledge at the time of authorization whether the handguns would be used in GBV as part of genocide, crimes against humanity, grave breaches of the Geneva Conventions or other war crimes. The exporting state thus proceeds to an assessment of whether the handguns could be used to commit or facilitate a violation under Article 7.1. Here, the evidence of the behaviour of the security forces in committing GBV and the state’s failure to prevent or punish GBV suggest that handguns controlled by the security forces could be used to facilitate GBV through intimidation. Handguns could be used by members of the security forces to facilitate rape. The security forces also have a record of failure to prevent or investigate sexual violence. Assessment of the seriousness of violations of human rights is determined by the gravity of a violation and the extent of the harm suffered by its victims, and serious acts of GBV always constitute serious violations of IHRL when perpetrated by state actors. This indicates that in this case there is a substantial risk of the weapons being used to commit or facilitate serious acts of GBV.

Stage 4: Identify whether mitigating measures or other approaches satisfactorily and significantly reduce the relevant Article 7.1 risks.

Country A has relatively progressive domestic laws and treaty commitments related to GBV. However, its federal structure has led to uneven implementation across sub-national jurisdictions and UN Women has noted insufficient implementation of laws on GBV and insufficient prosecution of GBV-related offenses. Country A is State Party to the ATT, the International Covenant on Civil and Political Rights (ICCPR), CEDAW and the Optional Protocol to CEDAW. However, various NGOs have raised concerns regarding Country A’s CEDAW compliance, noting a failure to curb increasing femicides, reports of sexual violence perpetrated directly by state agents, and impunity for violence against female journalists and human rights defenders. Country A has laws regulating the use of weapons by state agents and prohibits state agents from retaining their government-issued guns while off-duty.

Mitigating measures must be forward-looking and timely. They must aim at assessing how Country A and the exporting country might work together to ensure that there is not an overriding risk that the arms to be transferred will be used to commit or facilitate serious acts of GBV. Unless it is clear that the overriding risk is adequately addressed by mitigating measures, then the transfer must be denied.
COUNTRY B

BACKGROUND
An arms manufacturer submits a licence application for the export of 1,000 handguns to the police force of Country B. Country B is a monarchy, with a population of between 30 million and 40 million people. Country B has very high human-development indicators, ranking near the top among countries in its region and in the top portion of countries worldwide. However, its gender-equality indicators lag significantly behind those in the rest of its development group and in its region, which already underperforms on gender equality across the board. Country B has a very large population of foreign migrant workers, many of them working in domestic employment and with very limited access to legal protections and/or other remedies for harms they may experience. Country B has a poor record on rule of law and judicial independence. Highly conservative interpretations of religious law dominate the judicial system, and the country’s judges enjoy wide discretion over how to interpret and apply religious law. Overall, this conservative approach to religious law is not consistent with gender equality. Rates of violence are relatively low, and statistics from the past five years indicate fewer than two murders per 100,000 people.

RISK ASSESSMENT
As identified earlier, there are four stages to a rigorous risk assessment.

Stage 1: Identify what types of GBV are recognized as violations under Article 6.3 or Article 7.1 of the ATT.

Prior to conducting risk assessments of licence applications, states should compile a list of types of GBV that are recognized as violations under Article 6.3 or Article 7.1, using the background resources indicated above.

Stage 2: Identify which of these violations are prevalent in the recipient state.

GBV is prevalent in Country B, but its exact contours are extremely difficult to measure or even estimate. The relative prevalence of different kinds of GBV remains unknown. A UN investigation from the past decade determined physical violence to account for more than half of all domestic violence. A study conducted by researchers at a university in Country B in the past five years, meanwhile, identified controlling behaviour as the most common form of intimate partner violence, followed by emotional violence, sexual violence, and physical violence. The studies and reports agree that GBV is frequently focused on controlling women, often in tandem with the country’s legal structure that provides a close male relative with effective control over all of a woman’s major life decisions, including her ability to seek medical care, accept a job, travel and get an education. Country B’s legal, social and cultural structures systematically deny women access to public spaces, empowerment, protection from harm, autonomy and the justice system.

In addition to the generalized situation of pervasive GBV, child marriage remains prevalent in Country B, almost exclusively involving a female child and a male adult, setting the stage for a variety of forms of GBV, especially sexual violence. Female migrant workers in Country B are also particularly vulnerable to GBV, with the UN reporting that female domestic workers, in particular, are disproportionately victims of physical, verbal and sexual abuse. Social attitudes towards GBV are conservative. Women who do report violence, especially sexual violence, face a wide range of negative consequences including diminished marriage opportunities, societal reprisal, criminal sanctions including imprisonment and accusations of adultery.

This situation is a good illustration of the tension between assessing prevalence and recognizing under-reporting. As self-reporting is a key means of assessing the prevalence of GBV, in countries or communities where prevailing social norms stigmatize survivors of GBV or normalize it, there will be significant under-reporting. Overall, Country B is a good example of the challenge in arms export licensing of assessing prevalence under conditions of systematic underreporting.

The risk assessment should then consider Country B’s state capacity to prevent and punish acts of GBV. The police force, both as a general arm of the state apparatus and as the specific entity tasked with enforcing criminal and religious law, is likely to be implicated in GBV, both in use and facilitation terms. In particular, the criminalization of adultery even for a woman who has been raped, the state’s use of force against female bodies and the state’s failure to protect women who report the domestic violence perpetrated against them all raise serious concerns. In addition, the police specifically and the state, in general, have largely failed to protect vulnerable migrant women and children from abuse, trafficking and forced labour. UN human rights treaty bodies reporting frequently criticizes Country B for its poor record on gender equality, its vastly inequitable legal system that disadvantages women and strips them of autonomy, and its failure to protect women from domestic and sexual violence.
Stage 3: Assess whether arms, ammunition, parts or components would be used to commit GBV as a violation under Article 6.3, or could be used to commit or facilitate a violation under Article 7.1.

In the case of Country B, the exporting state does not have knowledge at the time of authorization whether the handguns would be used in GBV as part of genocide, crimes against humanity, grave breaches of the Geneva Conventions or other war crimes. The exporting state thus proceeds to an assessment of whether the handguns could be used to commit or facilitate a violation under Article 7.1. Guns are widely available in Country B, but deaths by gun violence are rare. Though physical violence is common, it appears rare for guns to be used in its perpetration. Country B imports enormous quantities of SALW. Background checks are part of the licensing process for gun ownership, including inquiries into incidents of family violence, though it is not clear that a history of family violence precludes gun ownership. Country B regulates the possession and use of small arms by current and retired law enforcement officials, and additionally regulates the private ownership of all small arms and ammunition. While the risk of serious GBV in Country B is substantial, weapons are likely to play a facilitating role in a system of oppression rather than a direct role in the commission of violence.

Stage 4: Identify whether mitigating measures or other approaches satisfactorily and significantly reduce the relevant Article 7.1 risks.

Country B does not recognize marital/spousal rape as a crime. As of ten years ago, Country B had not specifically criminalized rape, relying instead on religious law to punish rapists for crimes of vice and corruption. Because rape is tried under the country’s conservative interpretation of religious law, victims of rape frequently face punishment as adulterers when they report the crimes perpetrated against them. Recent efforts have been made to reform the domestic legal framework on these issues. A law passed in the past five years broadly criminalized domestic abuse, but enforcement of that law remains sparse at best. Country B has neither signed nor ratified the ATT. It also has not ratified the ICCPR or the International Covenant on Economic, Social and Cultural Rights (ICESCR). It has ratified CEDAW, the Convention against Torture and the Convention on the Rights of the Child (CRC), as well as the CRC’s optional protocols on the involvement of children in armed conflict and on the sale of children, child prostitution and child pornography. However, international observers have raised concerns about Country B’s compliance record. It has not ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families.

Mitigating measures must be forward-looking and aim to assess how Country B and the exporting country might work together to ensure that there is not an overriding risk that the arms to be transferred will be used to commit or facilitate serious acts of GBV. Unless it is clear that the overriding risk is adequately addressed by mitigating measures, then the transfer must be denied.
RECOMMENDATIONS FOR ATT IMPLEMENTATION

This chapter has identified opportunities and challenges for the implementation of GBV provisions in the ATT. Opportunities include a growing recognition in international policy that GBV extends beyond VAW, an increasing willingness of States Parties to discuss GBV as a problem with relevance to arms transfer control and to share experience about implementation of Article 7.4, and the spread of best practice guidance from NGOs and research centres that can assist States Parties in implementation. Challenges include knowing how to integrate a distinct gender perspective into policy and practice, navigating the challenge of underreporting and generating data, and interpreting gender as referring to more than just women.

This chapter makes five key recommendations:

1. States Parties should improve the representation and meaningful participation of women and also gender non-conforming people in the ATT process in particular and arms control and disarmament initiatives in general.

2. On accession to the ATT, States Parties should use their Initial Reports to make clear what changes to policy and practice they have made, and update their reports as such policies and practices change.

3. States Parties should find ways to generate better data about GBV and strengthen their GBV risk assessments. They should also share such information at CSPs in support of more harmonized implementation. This includes data about gender representation within national export control systems, as well as data about the problem of GBV itself. Given the chronic underreporting of GBV, better and more disaggregated data that can be collected without subjecting survivors of GBV to further harm is crucial. Related to this, UN bodies should integrate gender-sensitive analysis into their IHL and IHRL reporting. As States Parties rely on UN information as sources for their risk assessment, the UN foregrounding gender will allow them to better prevent GBV by making proper risk assessments.

4. States Parties should practice transparency as it relates to risk assessment processes within CSP 2019 and beyond. The information provided here, in particular that shared by states in interviews, is a useful first step in sharing best practices as well as limitations and challenges, and toward a common effort to implement Article 7.4 as rigorously as possible.

5. States Parties should use the ATT Working Groups and the CSP process as a means to improve the treatment of GBV in arms export licensing policy and practice. As indicated by interviews with States Parties, there is appetite for further research and sharing of information, expertise and best practices around the implementation of Article 7.4.

"GIVEN THE CHRONIC UNDERREPORTING OF GBV, BETTER AND MORE DISAGGREGATED DATA THAT CAN BE COLLECTED WITHOUT SUBJECTING SURVIVORS OF GBV TO FURTHER HARM IS CRUCIAL."
US ARMY HELICOPTERS IN MULTINATIONAL LOGISTICS EXERCISE LED BY CROATIAN, SLOVENIAN AND US ARMED FORCES.

CREDIT: © US ARMY / STAFF SGT. AUSTIN BERNER
CHAPTER 2: ARMS EXPORTS AND IMPORTS – ASSESSING 2017 ANNUAL REPORTS

2.1 - COUNTRY PROFILE ANALYSIS

Accurate, comprehensive and timely reporting is a vital component in fulfilling the purpose of the ATT to promote "cooperation, transparency and responsible action by States Parties in the international trade in conventional arms." Reporting is a pre-requisite for transparency, as it facilitates confidence-building, responsibility and cooperation by allowing each State Party to be sure that others respect their Treaty commitments. It is also essential for civil society and other stakeholders to be assured that all States Parties have fulfilled their obligations under the Treaty. All should be confident that no State Party has reneged on its commitments.

Transparency with regard to exports and imports can also help shed light on global arms transfers, mitigate the risks associated with an arms trade conducted in secret, and serve as a confidence-building measure that can dissipate tensions and lead to international cooperation and assistance. Accurate, comprehensive and timely reporting is essential to assist States Parties in making licensing decisions. An important component of the risk assessments set out in Articles 6 and 7 and preventing diversion in Article 11 should be examination of arms already imported by a potential recipient. It should be cause for concern if the quantity of arms imported from all sources appears inconsistent with the nature of the end-user or stated end-uses, the technical capacity of the end-user to effectively use or maintain the items, or the legitimate security concerns of the importing state.

Analysis of 2017 Annual Reports presented in the remainder of this chapter shows that overall progress on effective reporting is disappointing, in terms of both the quantity and quality of the reports received. While a group of States Parties has displayed commitments to comprehensive, public reporting, the lack of effective reporting by many described in this chapter is a matter of concern, as reporting has a vital role to play in the implementation of the Treaty.

QUANTITY OF REPORTS

As the number of States Parties due to submit an Annual Report has increased over the last three years, the total number of reports submitted by them has remained fairly constant. As a result, the percentage of States Parties submitting reports has decreased along with reporting compliance.

REDUCED REPORTING RATES

Eighty-nine States Parties had a legal obligation to submit by 31 May 2018 an Annual Report on their arms imports and exports in 2017. Of those, only 54 (61 per cent) submitted a report ahead of the cut-off date for analysis on 1 February 2019. Thirty-five states with an obligation to report (39 per cent) did not do so.

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5 Albania, Argentina, Australia, Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Costa Rica, Croatia, Cyprus, Czech Republic, Denmark, Dominican Republic, El Salvador, Estonia, Finland, France, Georgia, Germany, Greece, Hungary, Ireland, Italy, Japan, Latvia, Liechtenstein, Lithuania, Luxembourg, Madagascar, Malta, Mauritius, Mexico, Montenegro, Netherlands, New Zealand, Norway, Panama, Peru, Poland, Portugal, Republic of Macedonia, Republic of Moldova, Romania, Senegal, Serbia, Sierra Leone, Slovakia, Slovenia, South Africa, Spain, Sweden, Switzerland, Tuvalu, United Kingdom.
The reporting rate of 61 per cent marks the lowest in the last three years of reporting and a consistent decline in the overall rate of reporting each year.\(^7\)

- 2015 Annual Reports – 80 per cent
- 2016 Annual Reports – 69 per cent
- 2017 Annual Reports – 61 per cent

This steady decline is due in large part to States Parties that have ratified or acceded to the Treaty but have not submitted Annual Reports. Therefore, the decrease in the proportion of States Parties that have actually submitted a report is mainly due to the increase in the total number of States Parties. This suggests that new States Parties are less likely to submit reports and could be a priority for outreach and capacity building concerning reporting.

Forty-four States Parties have submitted 2015, 2016 and 2017 Annual Reports, and were among the first to become States Parties.\(^8\) That group constituted 72 per cent of all the 61 States Parties required to submit their first Annual Report for 2015 transfers. Countries that became States Parties in subsequent years, and whose first Annual Reports were due after 2016, have much lower rates of reporting. As the number of States Parties to the Treaty has grown, each year more states are obliged to submit Annual Reports. The 89 states obliged to submit 2017 reports marked an increase of 14 State Parties from those obliged to submit 2016 reports, and an increase of 24 from those obliged to submit 2015 reports.\(^9\)

Of the 14 that were required to submit their first Annual Report for 2017 transfers, only four did so for that year (Greece, Switzerland, Mauritius and Republic of Moldova).\(^10\) Nine states were supposed to report for the first time in May 2018 on 2017 data, but did not.\(^11\)

A majority of the States Parties that submitted a publicly available 2017 Annual Report had seemingly already built up national reporting capacity before they became ATT States Parties. They were:

- Part of pre-existing regional arms trade reporting regimes (26 were members of the European Union and five were members of the South Eastern and Eastern Europe Clearinghouse for the Control of Small Arms and Light Weapons)
- Had a long history of producing national arms export reports (Norway, South Africa and Switzerland)
- Had recently reported to the UN Register of Conventional Arms before their first ATT Annual Report was due (Liechtenstein, Mexico, El Salvador, Japan).

All these States Parties would likely have had a pre-existing monitoring and reporting infrastructure that could be used for ATT reporting. Twelve States Parties that submitted reports for 2017 (or earlier years) did not have a recent prior history of reporting via other transparency mechanisms.\(^12\)

Six states reported for the first time by submitting 2017 Annual Reports.\(^13\) As new States Parties, Cyprus, Georgia, Madagascar and Peru had not needed to report before, while Tuvalu and Malta had been obliged to begin reporting with 2016 Annual Reports and 2015 Annual Reports, respectively, but did not do so.

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\(^7\) Reporting rates for 2015, 2016 and 2017 are based upon information found on the ATT Secretariat website. Due to late submissions and an updated methodology for reporting rates, rates may differ slightly when compared with analysis from previous years.

\(^8\) Argentina, Australia, Albania, Austria, Belgium, Bosnia and Herzegovina, Bulgaria, Costa Rica, Croatia, Czech Republic, Denmark, Dominican Republic, El Salvador, Estonia, Finland, France, Germany, Hungary, Ireland, Italy, Japan, Latvia, Liechtenstein, Lithuania, Luxembourg, Mexico, Montenegro, Netherlands, New Zealand, Norway, Panama, Poland, Portugal, Romania, Senegal, Serbia, Sierra Leone, Slovakia, Slovenia, South Africa, Spain, Sweden, Republic of Macedonia, United Kingdom of Great Britain and Northern Ireland.

\(^9\) The 61 figure is based on information reported on the ATT Secretariat website. This is different to the figure of 63 which had been included in previous editions of the ATT Monitor. The discrepancy is due to differing interpretations of States Parties’ obligations under the Treaty.

\(^10\) Greece was not required to submit a 2015 Annual Report but did so anyway. Its 2017 Annual Report was therefore its second report.


\(^12\) Australia, Costa Rica, Dominican Republic, Georgia, Mauritius, New Zealand, Panama, Peru, Republic of Moldova, Senegal, Sierra Leone, Tuvalu.

\(^13\) Cyprus, Georgia, Madagascar, Malta, Peru, Tuvalu.
CONFIDENTIAL REPORTS
Four States Parties that submitted 2017 Annual Reports requested that they be restricted to an area of the ATT website that is not publicly available (Argentina, Cyprus, Greece, Madagascar). This is a slight increase from three States Parties that submitted confidential 2016 Annual Reports (Liberia, Panama, Senegal).

This marks a change in practice for some of these States Parties. Argentina made its 2015 and 2016 Annual Reports publicly available. Greece also made its 2016 Annual Report publicly available, which it submitted despite not being due to submit. Cyprus and Madagascar had not reported before, so their first Annual Reports submitted for 2017 were kept confidential.

Positively, Panama and Senegal both kept their 2016 Annual Reports confidential but made their 2017 Annual Reports publicly available.

LATE REPORTS
Of the 54 States Parties that submitted a 2017 Annual Report, only 36 submitted reports within a week of the 31 May 2018 deadline set out in the Treaty.14 Eighteen of those States Parties (33 per cent) submitted late reports between the reporting deadline and the 1 February 2019 cut-off date of this analysis.15

The 18 late 2017 Annual Reports submitted by States Parties marks a slight improvement in the number of late reports submitted in the previous year – more states submitted reports on-time compared to those who submitted late. Last year, 19 States Parties that submitted reports (38 per cent) submitted over a week after the reporting deadline and before the cut-off date for ATT Monitor analysis.

Twelve States Parties submitted both 2017 and 2016 Annual Reports late, perhaps reflecting national reporting and monitoring systems that struggle to meet or are incompatible with Treaty obligations.16

Positively, five States Parties submitted 2017 Annual Reports on-time after previously submitting late reports (Mauritius, Montenegro, Norway, Panama and Republic of Macedonia).

QUALITY OF REPORTS
Of the 89 States Parties due to submit a 2017 Annual Report, only 29 States Parties (33 per cent) submitted a publicly available Annual Report that contains the minimum information necessary to allow a reader to assess its arms transfers. They are identified in the following section on good practice.

For the ATT Monitor to consider this threshold met, an Annual Report must, for each transfer:
- Specify weapon type
- Provide a number or value (or both) for each item
- Clearly name the final exporting/importing country

Of those that submitted reports, 17 States Parties (31 per cent) submitted reports that did not contain the minimum information necessary (as defined above) in some or all of its sections. They are identified below. This figure does not include the two States Parties that submitted ‘nil’ reports stating that they had not imported or exported weapons in 2017,17 or the four States Parties that submitted confidential reports.

14 Albania, Argentina, Belgium, Bosnia and Herzegovina, Bulgaria, Czech Republic, El Salvador, Georgia, Germany, Italy, Japan, Latvia, Liechtenstein, Lithuania, Luxembourg, Madagascar, Malta, Mauritius, Montenegro, New Zealand, Norway, Panama, Peru, Portugal, Republic of Moldova, Romania, Senegal, Serbia, Sierra Leone, Slovakia, Slovenia, South Africa, Sweden, Switzerland, FYR Macedonia, United Kingdom.
15 Australia, Austria, Costa Rica, Croatia, Cyprus, Denmark, Dominican Republic, Estonia, Finland, France, Greece, Hungary, Ireland, Mexico, Netherlands, Poland, Spain, Tuvalu.
16 Australia, Austria, Costa Rica, Croatia, Denmark, Dominican Republic, Estonia, France, Hungary, Ireland, Mexico, Poland.
17 Sierra Leone and Tuvalu. Another State Party, Bosnia and Herzegovina, submitted ‘nil’ import and export reports though it submitted data for both in the ATT reporting template.
EXCESSIVE AGGREGATION

As outlined above, reporting must be accurate and comprehensive in addition to public and timely in order for States Parties to fulfil the aims and objectives of the ATT. Providing excessively aggregated data in Annual Reports makes it difficult or impossible to determine if an ATT State Party is abiding by its Treaty obligations, in terms of both transparency and in licensing decisions. Without clearly disaggregated data reported by States Parties, it is not possible to determine how many of which weapons went to which exporting or importing states.

Of the 54 Annual Reports submitted by States Parties for 2017, 17 (31 per cent) contained aggregation which prevented effective analysis of some or all of a State Party’s exports or imports. 18

Two States Parties (Montenegro and South Africa) provided less information through more aggregated data in 2017 Annual Reports than in 2016. Positively, two States Parties (El Salvador and the Republic of Macedonia) improved the quality of 2017 reports by including more comprehensive, disaggregated data than were included in 2016 reports.

Many States Parties continued their practice of reporting aggregated data in 2017 Annual Reports. Italy, for example, continued its practice of reporting the total number of each weapon type without stating final exporting or importing countries. It can then be determined that Italy authorized the export of 73 armoured combat vehicles, 15 attack helicopters, 1,061 missiles and 5 mortars, but not to which countries they were exported. As in the previous year, Italy also provided an annex containing an aggregated total of exports of small arms and light weapons (SALW) transferred to each recipient state. Italy did not specify which types of weapons were transferred to each country in the annex, and it is unclear what types of small arms Italy exported to which destination.

Other States Parties reported only the total quantity of each weapon type that was exported or imported in certain parts of their reports. For example:

- SALW exports and imports by Croatia and Mauritius
- SALW exports by Norway
- Small arms imports and exports by Denmark
- Small arms imports by Panama and Australia
Bosnia and Herzegovina reported total quantities of SALW exports and imports, as well as a combined list of the states from which the weapons were imported or exported – thus making it impossible to know the individual quantity for each recipient.

Other States Parties also provided a combined list of recipient countries in different parts of their reports including imports and exports of small arms by Estonia, Ireland and Malta; imports of small arms by Montenegro, the Republic of Moldova and Senegal.

Austria did not specify which weapon types were exported to each final importing state. In some cases, it aggregated SALW together, and in others it specified whether exports were of small arms or light weapons. Similarly, South Africa only reported exports and imports of the ‘Other’ category of small arms, which may be based upon an aggregated national reporting category.

Two States Parties used different categorization systems in their 2017 Annual Reports which led each state to provide aggregated data (Belgium and Sweden). Belgium used the ‘ML1’ category, from the EU Common Military List, which aggregates different types of small arms. It reported exports and imports of this category to and from each partner country. Belgium’s report did not include any information on exports and imports of light weapons (which would be covered by the EU list’s ML2 and ML4 categories).

Sweden listed as being ‘classified’ the number of items exported in the ATT sub-categories ‘recoilless rifles’ and ‘portable anti-tank missile launchers and rocket systems’, and of items imported in the category ‘missiles and missile launchers’. Sweden did provide additional data on the value of actual exports for categories ML1 through ML2, which collectively include a far wider range of military equipment than is covered by the ATT. Sweden’s use of the ML categories is more transparent than Belgium as it provided a much wider range of data. However, as the information reported in ML categories is aggregated, it is not possible to discern Sweden’s actual exports within the ATT reporting template categories it kept confidential.

19 In some cases it was possible to discern quantities reported by Ireland concerning transfers to Mali, Australia and the United States, and from China.
20 Senegal did provide some specific information concerning its imports from Austria, China, France, Israel and Ukraine.
21 Japan provided data using commodity trade statistics categories which roughly correspond to ATT reporting template categories.
22 Belgium also provided information on transfers of pistols to Austria and parts of machine guns to the United States.
23 Australia, Belgium, Bosnia and Herzegovina, Estonia, Ireland, Italy, Japan, Malta, Mauritius, Montenegro, Netherlands, New Zealand, Romania, Slovakia, Slovenia, South Africa, Sweden.
REPORTING GOOD PRACTICE

Twenty-nine States Parties submitted publicly available Annual Reports that contain the minimum information necessary to allow a reader to assess its arms transfers.24 Additional two States Parties submitted ‘nil’ reports clearly stating that they had not imported or exported weapons in 2017.25

Within this group, some States Parties made particularly good use of the ATT reporting template to provide additional information on the context of a transfer – the state of origin of the arms (if not the reported import or export partner), a description of the weapon, additional comments on the transfer, use of the ‘other’ category to include additional weapon types and the provision of additional notes on definitions and other methods used to compile the report. Examples of good reporting include:

- Albania and Hungary included detailed descriptions of their imports and exports of all types of arms.
- Bulgaria and Lithuania provided detailed descriptions of their imports and exports of major weapons and light weapons. Slovakia provided detailed descriptions of its imports and exports of major weapons.
- Costa Rica, Mexico, Peru, and Slovenia included detailed descriptions or comments in their reports on their exports and imports of SALW.26
- Netherlands made use of descriptions and specified states of origin for some major weapons, and provided links in the report to additional data sources and explanations of national reporting practices.
- New Zealand included data on imports of shotguns, a type of small arm not included in the ATT reporting template but is included in UN definitions of small arms. New Zealand also included additional information on its reporting practices.

CONCLUSION

Analysis of 2017 Annual Reports shows that although there is a group of States Parties that consistently display commitments to accurate, comprehensive and timely reporting, overall progress on effective reporting continues to be disappointing. The lack of effective reporting by many States Parties described in this chapter is a matter of concern and is reflected in both the quantity and quality of Annual Reports.

In ATT fora, States Parties have identified and shared challenges related to reporting obligations in the Treaty. These include:

- Confusion regarding reporting requirements
- Limited availability of information
- Limited capacity and resources
- Lack of internal coordination and communication27

Despite these challenges, there are steps States Parties can take to support reporting efforts. Stimson’s ATT Baseline Assessment Project identifies many of these steps and good practices. These include:

- Use resources provided by the ATT Secretariat and government and civil society experts for guidance
- Identify and promote synergies across relevant agreements to streamline reporting efforts and minimize burden
- Utilize ATT Voluntary Trust Fund to fund implementation assistance projects
- Appoint National Point of Contact that can lead internal coordination efforts28

The remaining chapter takes an in-depth look at States Parties’ reporting practices in 2017 Annual Reports and seeks to provide practice-specific recommendations to help States Parties fulfil their commitments to transparency in the ATT.

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24 Albania, Bulgaria, Costa Rica, Czech Republic, Dominican Republic, El Salvador, Finland, France, Georgia, Germany, Hungary, Japan, Latvia, Liechtenstein, Lithuania, Luxembourg, Mexico, Netherlands, New Zealand, Peru, Poland, Portugal, Republic of Macedonia, Romania, Serbia, Slovakia, Slovenia, Spain, Switzerland.
25 Another State Party, Bosnia and Herzegovina, submitted ‘nil’ import and export reports though submitted data for both in the ATT reporting template.
26 Peru only reported on its imports (as it reported ‘nil’ exports), and did not provide descriptions for some small arms listed under the ‘other’ category. Costa Rica did not report any imports or exports of light weapons.
28 For a more complete list, see Ibid., p. 10.
MORTAR BOMB CARRIERS HOLDING 81MM (L16) MORTARS, THE STANDARD MORTAR USED BY BRITISH ARMED FORCES.

CREDIT: © CROWN 2017 / STUART A. HILL
2.2 - COUNTRY PROFILES

This section examines the Annual Reports submitted by States Parties to the ATT covering their exports and imports of conventional arms in 2017. It presents analysis of reporting and transfer practices of each reporting State Party in the form of country profiles. By disaggregating its analysis on a country-specific basis, the ATT Monitor intends to provide easily comparable and nationally relevant findings to help inform future practice.

Eighty-nine States Parties were due to submit an Annual Report for 2017 to the ATT Secretariat by 31 May 2018. As of 1 February 2019, 54 had done so, of which 50 made their reports publicly available. These reports form the basis of the analysis presented here.

Annual Reports are one of the key tools for transparency at the disposal of States Parties. They help to build confidence between countries, and enable States Parties to demonstrate that their arms trade policies are consistent with their obligations in the ATT (especially Articles 6 and 7). In order for Annual Reports to fulfil this pivotal role, it is necessary that States Parties complete them in a timely, comprehensive, accurate and public manner.

The ATT Monitor continuously builds on the findings of assessments of each round of annual reporting. The analysis here seeks to supplement and build on the baseline analysis completed by the ATT Monitor in previous reports, which included an assessment of reporting practices, identification of a baseline of trends, examples of good national practices, and interpretive and practical challenges that were common among States Parties.

ANNUAL REPORTS ARE ONE OF THE KEY TOOLS FOR TRANSPARENCY AT THE DISPOSAL OF STATES PARTIES. THEY HELP TO BUILD CONFIDENCE BETWEEN COUNTRIES, AND ENABLE STATES PARTIES TO DEMONSTRATE THAT THEIR ARMS TRADE POLICIES ARE CONSISTENT WITH THEIR OBLIGATIONS IN THE ATT.

METHODOLOGY

All Annual Reports were downloaded for analysis by 1 February 2019. Any submitted subsequently, or amended by a State Party, have not been taken into consideration.

Where applicable, State Parties’ reports for 2017 were compared to the ones for 2016, to consider the extent to which national reporting practices differed following the previous year’s round of annual reporting under the ATT, and to assess if the common challenges identified had changed. As in previous years, reporting practices were assessed for each State Party according to key criteria, as follows:

- Submitting a report as per each State Party’s legal obligation under Article 13.3.
- Submitting a report on time (within one week of the 31 May 2018 deadline).
- Making a report publicly available (including not withholding data for reasons of commercial sensitivity or national security, and/or indicating where or how much information was withheld).
- Completing accurate and non-contradictory information.
- Providing data that is clearly disaggregated.
- Whether a State Party provides information that goes beyond the minimum requirements specified in Article 13.3 (for example, reporting on exports/imports of ammunition, additional information provided in voluntary national categories, etc.).

Overall, each State Party is considered on the extent to which its Annual Report contributes to or undermines the objective of increased transparency in the global arms trade. The analysis is not intended to highlight technical errors or as a ‘name and shame’ exercise, but to present comparable information that is country-specific in order to inform policymakers and civil society in each State Party, and to help support knowledge capacity among officials responsible for filling in ATT Annual Reports.

The ATT Monitor considers States Parties’ Annual Reports to be on time if they are published on the ATT Secretariat website within one week of the legal deadline (for this year’s analysis, 7 June 2018). Some States Parties have indicated that the date of submission for their 2017 Annual Reports was before the 31 May deadline, although they were only made available after the reported date of submission. The reason for the gap between the stated and actual dates of submission is unclear.

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1 Annual Reports are considered on time if they are published on the ATT Secretariat web site as of 7 June 2018 (one week after the deadline set out in ATT Article 13).
3 In order to be classified here as having provided clear, disaggregated data for each reported export and import, a State Party must clarify if it was reporting an Authorized or Actual import/export (or both), provide a number or value for each item, and clearly name the final exporting/importing country.
When States Parties included values of transfers in their reports, transfer summaries include a monetary value of reported imports and/or exports. All values have been converted to US dollars using the annual conversion rate for each currency for the 2017 calendar year. In some cases, the type of currency used by States Parties to report values was not specified, and this is indicated when relevant.

Similarly, in some instances, States Parties used country codes to indicate final exporting and importing countries. The ATT Monitor determined which countries such codes reference, though it did not verify with each State Party whether or not such determinations are accurate.

In addition to assessing reporting practices, each country profile includes key baseline data relating to the exports and imports described by States Parties in their Annual Reports. This data includes the following:

- Total number of export/import partners, and their Treaty status (as of 1 February 2019).
- The overall number and categories of major conventional weapon items reported, if available.\(^4\)
- The overall number and sub-categories of small arms and light weapons (SALW) reported.\(^5\)
- The principal trade relationships and major transactions reported by the State Party.

This section looks solely at transfer data as reported by each State Party in its ATT Annual Report. It does not compare the data with other relevant reporting mechanisms or findings by independent experts, such as media sources, national reports to parliamentary authorities, or the work of think tanks such as the Arms Transfers Database of the Stockholm International Peace Research Institute (SIPRI).\(^6\) Integrating information from such external sources would likely cast a different picture of the global arms trade, particularly in respect of the percentage of trade between countries. In order for the analysis conducted by the ATT Monitor and others to be as accurate as possible, it is critical that States Parties submit clear and comprehensive Annual Reports, and that they consider the fulfilment of their reporting obligations as an opportunity to support the ATT’s goal of greater transparency in the global arms trade.

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\(^4\) Categories of major conventional weapons include: battle tanks; armoured combat vehicles, large-calibre artillery systems, combat aircraft, attack helicopters, warships, and missiles and missile launchers.

\(^5\) Sub-categories of small arms include: revolvers and self-loading pistols, rifles and carbines, sub-machine guns, assault rifles, light machine guns, and others. Sub-categories of light weapons include: heavy machine guns, hand-held under-barrel and mounted grenade launchers, portable anti-tank guns, recoilless rifles, portable anti-tank missile launchers and rocket systems, mortars of calibres less than 75mm, and others.

**ALBANIA**

**Was an Annual Report submitted by 31 May 2018?**
Yes

**Was the Annual Report made public?**
Yes

**Was a ‘nil’ report submitted for exports or imports in 2017?**
No

**Was data withheld for ‘commercial sensitivity/national security-related’ reasons?**
No

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**Good practices:**
Albania provided clear, disaggregated information on its exports and imports in 2017.

Albania provided comments on exports and imports reported for 2017, describing the end-use and/or end-user.

Albania provided descriptions of items transferred.

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**Room for improvement:**
Albania indicated on the front page of its 2017 Annual Report that it did not include its national definitions of categories of arms reported, but it made reference to the EU Common Military List in Annex 2. It did not report on any voluntary national categories section for either exports or imports.

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**Transfer summary - 2017: Export Data**
- Albania reported exports to two countries in 2017. Of these, one was an ATT State Party and one was a non-member (Jordan).
- Albania reported exports of two major conventional weapons items, one battle tank and one armoured combat vehicle, both to Jordan for museum purposes. China was the state of origin for the armoured combat vehicle transfer.
- Albania reported exports of 31 SALW items. These were part of one transaction for 31 heavy machine guns to Bulgaria. The state of origin was China.

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**Reporting practice summary - 2017**
Albania’s reporting practice changed slightly in its 2017 Annual Report. In 2017 it reported **Actual Numbers** of exports and imports for SALW and major conventional weapons. It reported both exports and imports of major weapons in 2017, whereas in 2016 it did not report either.

The information provided in its 2017 Annual Report did not match the check boxes on the front page of its report, as it checked ‘no’ for both annual reports on exports and imports but provided data on both major conventional weapons and SALW.

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**Transfer summary - 2017: Import Data**
- Albania reported imports from seven countries in 2017. Of these, five were ATT States Parties and two were Signatories.
- Albania reported imports of 8 major conventional weapons items in 2017, all of which were armoured combat vehicles from Italy and the United States.
- Albania reported imports of 2,286 SALW items in 2017. Of these, 83 per cent were revolvers and self-loading pistols. The largest transaction was for 1,475 semi-automatic pistols from Austria for the civilian market and/or state police.
- The main exporters to Albania were Austria (67 per cent of reported import items), Croatia (18 per cent) and Italy (7 per cent).
**ANTIGUA AND BARBUDA**


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**ARGENTINA**

Was an Annual Report submitted by 31 May 2018?  
No, missed deadline

Was the Annual Report made public?  
No, report kept confidential

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EMPTY CASES FROM A GENERAL PURPOSE MACHINE GUN (GPMG) ON THE FLOOR AT A FORWARD OPERATING BASE IN AFGHANISTAN.

CREDIT: © CROWN 2012 / SGT. ANTHONY BOOCOCK
AUSTRALIA

Was an Annual Report submitted by 31 May 2018?
No, missed deadline

Was the Annual Report made public?
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?
Unspecified – Not ticked

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?
Unspecified – Not ticked

Good practices:
Australia provided clear, disaggregated information on its exports of major conventional weapons in 2017, and provided the Value, as well as the Number, of most items transferred.

Australia provided the number of authorizations (permits granted) along with the number of items in its exports of SALW.

Australia provided two comments on transfers of armoured combat vehicles in 2017, after not providing comments or descriptions on any of its transfers in 2016.

Room for improvement:
Australia did not specify if ‘commercially sensitive/national-security’ related data had been withheld from the report, although it withheld the number of reported imports in some cases.

Australia aggregated small arms exports by final importing state in 2017, so it is not possible to know what types of small arms were exported to each country.

Australia aggregated all states from which it imported small arms in 2017 and reported them only as ‘Various’.

Transfer summary - 2017: Export Data

• Australia reported exports to 32 countries and territories in 2017. Of these, 16 were ATT States Parties, seven were Signatories and seven were non-members (Canada, China, Ecuador, Fiji, Indonesia, Papua New Guinea and Solomon Islands).7
• Australia reported the export of 18 major conventional weapons items, spanning four categories.
• The largest export transfers of major conventional weapons items reported by Australia were 10 armoured combat vehicles, worth AU$20m (US$15.3m) to Fiji. Seven of these vehicles were delivered to Lebanon for end-use by Fiji.
• Australia reported the export of 5,871 SALW in 2017, worth a total of AU$2.4m (US$1.9m) from a total of 177 export permits granted. Australia did not disaggregate data by weapons sub-category.
• In terms of value, the main importers of SALW from Australia were the United States (64 per cent). In terms of number of permits granted, the main recipient was New Zealand (33 per cent).

Transfer summary - 2017: Import Data

• Australia reported imports of major conventional weapons from two countries, including one warship from Spain, 16 manned combat aircraft from the United States, and an unknown number of missiles and missile launchers, also from the United States.
• Australia reported the import of 102,613 SALW items in 2017, spanning four sub-categories, including ‘Others’. Australia aggregated data for each sub-category of SALW and referred to exporting states as ‘Various’.

Reporting practice summary - 2017

Australia’s reporting practice changed in some respects in its 2017 Annual Report from 2016. In both years, Australia reported the Authorized Number and most Values of exports of major conventional weapons and of SALW.

Australia provided Actual Numbers of imports of major conventional weapons in 2017. It provided Numbers of small arms imports but did not specify whether these were Authorized or Actual imports. It reported Actual imports of lights weapons in 2017. In 2016, Australia provided Actual Numbers of small arms imports. It provided Numbers of imports of major conventional weapons but did not specify whether these were Authorized or Actual imports.

7 Australia also reported exports to two non-UN members (Jersey and Macao).
Austria also reported arms exports to six non-UN members: Hong Kong, Kosovo, Macao, New Caledonia, Taiwan and the Vatican City.

Austria did not specify which currency it used for reported values of transfers. For this analysis, the ATT Monitor has assumed the currency to be euros.


**Austria's reporting practice remained mostly the same between 2017 and 2016. Austria reported Actual Numbers and Values of exports of major conventional weapons; it also reported Values, and in some cases Authorized and in other cases Actual Numbers of exports of SALW. Austria did not report imports in 2017.**

Transfer summary - 2017: Export Data

- Austria reported exports of arms to 86 destinations in 2017. Of these, 49 were ATT States Parties, 12 were Signatories and 19 were non-members (Algeria, Azerbaijan, Bolivia, Botswana, Canada, Ecuador, India, Indonesia, Jordan, Kenya, Kuwait, Kyrgyzstan, Oman, Qatar, Russia, Saudi Arabia, Solomon Islands, Tunisia and Turkmenistan).
- For major conventional weapons, Austria reported the export of three armoured combat vehicles to Germany and 14 to Spain.
- Austria reported the export of 3,100,256 SALW in 2017, with a total value of €386.3m (US$435.3). It was often not the state of origin of these transfers. Austria aggregated data such that it is impossible to determine the relevant sub-categories of SALW exports.
- In terms of Value, the main importers of SALW from Austria were the United States (75 per cent), Canada (4 per cent) and Indonesia (3 per cent).

Transfer summary - 2017: Import Data

- Austria did not report import data in 2017.
Belgium reported on voluntary national categories in 2017. These were reported under the EU Common Military List’s criteria ML1. This information was provided in lieu of providing a breakdown of SALW sub-categories, save for two reported imports of revolvers and pistols and light machine guns.

Good practices:

- Belgium reported five separate Authorized export transactions of major conventional weapons in four categories for 2017.
- Belgium’s reported exports of small arms (ML1 items) in 2017 totalled €266.1m (US$299.9m). The most valuable export destinations for small arms were Saudi Arabia (27 per cent of reported value) and the United States (19 per cent).

Room for improvement:

- Belgium also provided different types of information depending on the type of transfer in 2017:
  - Authorized Values for small arms exports (listed under voluntary national categories), as it did in 2016.
  - Authorized Value of major conventional weapons imports, whereas Authorized Numbers were provided in 2016.
  - Actual Numbers of small arms imports for 2017.
  - Actual Values of small arms imports listed under voluntary national categories, whereas Authorized Values were provided in 2016.

Transfer summary - 2017: Export Data

- Belgium reported exports to 63 destinations in 2017. Of these, 40 were ATT States Parties, nine were Signatories and 13 were non-members (Bhutan, Botswana, Brunei, Canada, India, Indonesia, Jordan, Kuwait, Morocco, Oman, Qatar, Saudi Arabia and Tunisia).
- Belgium reported five separate Authorized export transactions of major conventional weapons in four categories for 2017.
- Belgium’s reported exports of small arms (ML1 items) in 2017 totalled €266.1m (US$299.9m). The most valuable export destinations for small arms were Saudi Arabia (27 per cent of reported value) and the United States (19 per cent).

Transfer summary - 2017: Import Data

- Belgium reported imports from 29 countries and territories in 2017. Of these, 19 were ATT States Parties, six were Signatories and three were non-members (Canada, China, and India).
- The only import of major conventional weapons reported by Belgium in 2017 is an unmanned combat aircraft from France valued at €23.7m (US$26.7m).
- Belgium reported imports of 274 SALW, including revolvers and self-loading pistols from Austria and light machine guns from the United States.
- Belgium’s reported imports of ML1 items in 2017 totaled €48.1m (US$54.2m). The highest value exporters of ML1 items to Belgium were the United States (31 per cent), Japan (25 per cent) and Germany (15 per cent).
BELIZE


BOSNIA AND HERZEGOVINA

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? Yes (for exports and imports, but reported data for both)
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Bosnia and Herzegovina provided both Numbers and Values of SALW exports and imports.
Bosnia and Herzegovina provided descriptions of items exported and imported in 2017.
In its 2017 Annual Report, Bosnia and Herzegovina indicated that it did not keep any data confidential because of ‘commercial sensitivity or national-security related’ reasons, having done so previously for 2016.

Room for improvement:
Bosnia and Herzegovina did not specify if whether it was reporting Authorized or Actual exports or imports.
Bosnia and Herzegovina grouped together the final exporting and importing states and just provided the overall number and value of items transferred.

Transfer summary - 2017: Export Data
- Bosnia and Herzegovina reported exports to six countries in 2017. Of these, two were ATT States Parties, three were Signatories and one was a non-member (Egypt).
- Bosnia and Herzegovina did not report any exports of major conventional weapons.
- Bosnia and Herzegovina reported the export of 109 SALW covering five sub-categories. Collectively, these exports were worth €204,018 (US$229,906).
- Bosnia and Herzegovina grouped together final importing states under each sub-category of SALW, so it is impossible to distinguish which countries were destinations for the greatest number of arms in 2017.

Transfer summary - 2017: Import Data
- Bosnia and Herzegovina reported imports in 2017 from 15 countries and territories. Of these, 13 were ATT States Parties, and two were Signatories. None were non-members.
- In total, Bosnia and Herzegovina reported the import of 3,419 SALW, covering seven sub-categories. Collectively, these reported imports were worth €2m (US$2.3m). These were impossible to disaggregate by exporting country because it grouped them together in its report.
- Bosnia and Herzegovina grouped together final exporting states under most sub-categories of SALW, so it is impossible to distinguish from which countries the largest number of arms were imported in 2017.

Bosnia and Herzegovina’s reporting practice changed in its 2017 Annual Report. It provided Numbers and Values of SALW items exported and imported but did not specify whether they were for Authorized or Actual transfers. It changed its definition of the term ‘export’ from a detailed national definition provided in its 2016 report, to ‘Physical transfer of items across a national border’ in its 2017 report.

Although Bosnia and Herzegovina provided data on arms exported and imported during 2017, it did not tick the relevant boxes on the front page of its report and instead ticked ‘yes’ for ‘nil’ reports of both exports and imports.

17 Bosnia and Herzegovina did not specify which currency it used for reported values of transfers. For this analysis, the ATT Monitor has assumed the currency to be euros. Currency conversion via OECD Data, reflecting 2017 annual conversion rate. https://data.oecd.org/conversion/exchange-rates.htm.
18 Ibid.
**BULGARIA**

**Was an Annual Report submitted by 31 May 2018?** Yes

**Was the Annual Report made public?** Yes

**Was a ‘nil’ report submitted for exports or imports in 2017?** No

**Was data withheld for ‘commercial sensitivity/national security-related’ reasons?** Yes

**Good practices:**
Bulgaria provided clear, disaggregated data for every reported export and import in 2017.
Bulgaria provided descriptions of most of its exports and imports of major conventional weapons and SALW in 2017, as it did in 2016.

**Room for improvement:**
In its 2017 Annual Report, Bulgaria excluded some data for ‘commercial sensitivity/national security-related’ reasons, having not done so previously for 2016. It did not specify where or how much information was withheld.
Bulgaria provided no comments on its exports and imports of SALW in 2017.

**Transfer summary - 2017: Export Data**
- Bulgaria reported exports to 34 destinations in 2017. Of these, 15 were ATT States Parties, six were Signatories, and 13 were non-members (Afghanistan, Algeria, Armenia, Democratic Republic of Congo, Egypt, Indonesia, Iraq, Morocco, Qatar, Saudi Arabia, Somalia, Uganda and Uzbekistan).
- Of major weapon categories, Bulgaria reported the export of 24 armoured combat vehicles, 526 large-calibre artillery systems, and three manned attack helicopters.
- The largest reported transaction was for 280 mortars to Iraq.
- Bulgaria reported the export of 56,751 SALW items in 2017, covering nine sub-categories. The main destinations for SALW exports were Saudi Arabia (50 per cent), the United States (12 per cent) and Afghanistan (9 per cent).
- The largest reported SALW export was 25,500 assault rifles to Saudi Arabia.

**Transfer summary - 2017: Import Data**
- Bulgaria reported imports in 2017 from 22 countries. Of these, 18 were ATT States Parties, two were Signatories, and two were non-members (Belarus and Canada).
- Of major weapon categories, Bulgaria reported the import of 25 armoured combat vehicles (120 from Slovakia and 5 from Poland) and 200 large-calibre artillery systems (from Hungary), the latter of which was the largest reported import.
- Bulgaria reported 6,660 SALW items in 2017, covering nine sub-categories, including ‘Others’. The major SALW exporters to Bulgaria were Austria (17 per cent), Romania (16 per cent) and Italy (12 per cent).
- The largest reported SALW import was 1,090 revolvers and self-loading pistols from Austria.

**BURKINO FASO**


**CABO VERDE**

**COSTA RICA**

Reporting practice summary - 2017

Costa Rica's reporting practice for 2017 differed from the previous year in that it submitted a report for both exports and imports of arms whereas in 2016 it provided a ‘nil report’ for exports.

In 2017, Costa Rica reported Actual Numbers for small arms exports and imports under voluntary national categories.

Costa Rica did not report exports or imports of major conventional weapons in 2017.

Transfer summary - 2017: Import Data

- Costa Rica reported imports in 2017 from eight countries. Of these, six were ATT States Parties and two were Signatories.
- Costa Rica reported the import of 3,729 small arms. The major small arms exporters were the United States (80 per cent) and Austria (12 per cent).
- Costa Rica reported the import of 13.6m units of ammunition. The United States accounted for 98 per cent of all of Costa Rica’s imports of ammunition during 2017.

Transfer summary - 2017: Export Data

- Costa Rica reported a total of eight exports of small arms in voluntary national categories, all of which were to Guatemala. Comments on these transfers specify that the arms were transferred when a private citizen relocated from Costa Rica to Guatemala.

Good practices:

- Costa Rica provided clear, disaggregated data for every reported export and import in 2017.
- Costa Rica reported disaggregated imports of ammunition under voluntary national categories.
- Costa Rica provided descriptions for all small arms exports and imports under voluntary national categories, as well as comments for all exports.

Room for improvement:

- Costa Rica reported an aggregated total of eight exports in the small arms category B and an aggregated total of 3,729 imports in the small arms category B, making it impossible to analyse the Number of items transferred and their destinations.

COTE D’IVOIRE


CHAD

CROATIA

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<tr>
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<td>No, missed deadline</td>
</tr>
<tr>
<td>Was the Annual Report made public?</td>
<td>Yes</td>
</tr>
<tr>
<td>Was a 'nil' report submitted for exports or imports in 2017?</td>
<td>No</td>
</tr>
<tr>
<td>Was data withheld for 'commercial sensitivity/national security-related' reasons?</td>
<td>Yes</td>
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**Good practices:**
Croatia provided the number of items exported and imported in relevant SALW sub-categories.

**Room for improvement:**
Croatia did not name any exporting or importing countries in 2017 and so presented aggregated data for relevant SALW sub-categories for both exports and imports.
Croatia excluded some data for 'commercial sensitivity/national security-related' reasons and did not specify where or how much information was withheld.

**Transfer summary - 2017: Export Data**
- Croatia did not report exports of major conventional weapons in 2017.
- Croatia reported the Authorized export of 541,653 small arms and 191 light weapons in 2017, more than 99 per cent of which were revolvers and self-loading pistols.
- Croatia did not name the importing states or provide any further information.

**Transfer summary - 2017: Import Data**
- Croatia did not report imports of major conventional weapons in 2017.
- Croatia reported the Authorized import of 7,522 small arms, of which 68 per cent were revolvers and self-loading pistols, 25 per cent were rifles and carbines, and 7 per cent were assault rifles.
- Croatia did not name the exporting states or provide any further information.

CYPRUS

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<thead>
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<th>Yes/No/Indeterminate</th>
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<tr>
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<td>Yes</td>
</tr>
<tr>
<td>Was the Annual Report made public?</td>
<td>No, report kept confidential</td>
</tr>
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</table>

Croatia’s reporting practice for its 2017 Annual Report changed slightly from its 2016 report. In 2017 it reported on Authorized Numbers of exports and imports of SALW. It did not report on exports or imports of major conventional weapons after having reported exports of major conventional weapons in 2016.
CZECH REPUBLIC

Was an Annual Report submitted by 31 May 2018? Yes

Was the Annual Report made public? Yes

Was a ‘nil’ report submitted for exports or imports in 2017? No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Czech Republic provided clear, consistent and disaggregated data for each reported import and export. Czech Republic provided comments for some exports to indicate end-use (for example, exports for collection purposes, or items that were demilitarized).

Room for improvement:
Czech Republic did not provide comments on imports of SALW, and it provided no descriptions of any items that were transferred.

Transfer summary - 2017: Export Data
- Czech Republic reported a total of 58 export destinations in 2017. Of these, 37 were ATT States Parties, eight were Signatories and 11 were non-members (Afghanistan, Bolivia, Canada, Egypt, Indonesia, Iraq, Kenya, Laos, Sri Lanka, Tunisia and Vietnam).
- Czech Republic reported the export of a total of 153 major conventional weapons items, covering four categories. The largest export transaction was for 53 armoured combat vehicles to Hungary.
- In total, Czech Republic reported the export of 71,774 SALW items in 2017, covering 11 sub-categories, including ‘Other’. The majority of these were exported to Slovakia (26 per cent), the United States (23 per cent) and Kenya (16 per cent).

Transfer summary - 2017: Import Data
- Czech Republic reported imports from six countries in 2017. Of these, one was an ATT State Party, three were Signatories and two were non-members (Canada and China).
- Czech Republic did not report imports of major weapons in 2017. In total, it reported the import of 3,850 SALW items. The majority of reported SALW imports were from China (50 per cent), Canada (29 per cent) and Turkey (17 per cent).
- The two largest import transactions reported by Czech Republic in 2017 were for 1,900 assault rifles from China and 1,000 portable anti-tank missile launchers and rocket systems from Canada.

19 In addition, Czech Republic reported exports to two non-UN members (Hong Kong and New Caledonia).
DENMARK

Was an Annual Report submitted by 31 May 2018?  
No, missed deadline

Was the Annual Report made public?  
Yes

Was a 'nil' report submitted for exports or imports in 2017?  
No

Was data withheld for 'commercial sensitivity/national security-related' reasons?  
No

Good practices:
Denmark provided descriptions of some items, including all exports and imports of major conventional weapons, and some small arms imports.

Denmark provided both the Number and Value of its only reported export of major conventional weapons.

Room for improvement:
Denmark continued to aggregate countries supplying its small arms imports in 2017, reporting the states of origin collectively as 'Multiple exporting states', making it impossible to analyse, in some cases, the Number and/or Value from specific source countries.

Denmark reported the export of 1,619 small arms under the sub-category 'Other'. It did not provide details of final importing states or information on the types of weapons that were transferred.

Transfer summary - 2017: Export Data
- Denmark reported the Authorized export of three warships to Ukraine, its only report of major conventional weapons exports in 2017. It included a value of €102m (US$114.9m).
- Denmark reported the total export of 5,058 SALW in 2017, covering four sub-categories, including 'Other'. 58 per cent of these reported exports were rifles and carbines and 32 per cent were 'Others'. It did not name the importing countries or provide any further information.

Transfer summary - 2017: Import Data
- Denmark reported the Authorized import of six armoured combat vehicles from the United States, its only report of major conventional weapons imports in 2017.
- Denmark reported the import of 17,998 small arms items in 2017, spanning five sub-categories, including 'Others'. None of the exporting states were revealed, however Canada and the United States were named together as the state of origin for 48 per cent of small arms imports.

DOMINICA

### DOMINICAN REPUBLIC

| Was an Annual Report submitted by 31 May 2018? | No, missed deadline |
| Was the Annual Report made public? | Yes |
| Was a ‘nil’ report submitted for exports or imports in 2017? | Yes (for exports) |
| Was data withheld for ‘commercial sensitivity/national security-related’ reasons? | Yes |

#### Good practices:
- Dominican Republic provided a description for its only reported import of small arms.
- Dominican Republic reported imports of ammunition under voluntary national categories.

#### Room for improvement:
- Dominican Republic excluded some data for ‘commercial sensitivity/national security-related’ reasons and did not specify where or how much information was withheld.
- Dominican Republic did not include information on exporting countries in its report of ammunition imports (under voluntary national categories).

#### Transfer summary - 2017: Export Data

#### Transfer summary - 2017: Import Data
- Dominican Republic reported the import of 30 Beretta and Perazzi shotguns from Italy under the sub-category ‘Other’. This was its only import of arms.
- Dominican Republic reported the import of 562,000 pieces of ammunition, as well as 200 extendable batons under voluntary national categories. It did not give details of the exporting countries.

#### Reporting practice summary - 2017
There was no change to the reporting practice of the Dominican Republic from the previous year. It reported both Actual and Authorized Numbers of imports of small arms and ammunition in voluntary national categories in 2017. It submitted a ‘nil’ report for exports.
EL SALVADOR

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? Yes (for exports)
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:

El Salvador indicated by ticking the box that it had not withheld information for ‘commercial sensitivity/national security-related’ reasons in 2017, after not indicating whether information was withheld in 2016.

El Salvador disaggregated total amounts of small arms imported under each sub-category in 2017, after providing some aggregated information in 2016.

Room for improvement:

El Salvador did not provide descriptions of its reported items in 2017.

El Salvador created new small arms sub-categories when reporting imports but did not clarify whether these were established national definitions.

Reporting practice summary - 2017


• It reported Actual Numbers of small arms imports, after reporting Authorized Numbers in 2016.

• It changed its definition of the term ‘import’ from ‘Physical transfer of items across a national border’ in 2016, to ‘Transfer of control’ in 2017.

• It changed its response provided under ‘Scope of report’ on the front page of the reporting template (see below).

• It did not report any imports of major conventional weapons, having provided this information in 2016.

Transfer summary - 2017: Import Data

• El Salvador reported imports from eight countries in 2017. Of these, five were ATT States Parties, and three were Signatories.

• El Salvador reported no imports of major conventional weapons in 2017.

• El Salvador reported the import of 11,932 small arms in 2017, covering four sub-categories. The main exporter to El Salvador was the United States (78 per cent). The largest transactions were for 7,173 pistols and 1,348 rifles, both from the United States.
ESTONIA

Reporting practice summary - 2017

Estonia’s reporting practice for its 2017 Annual Report changed slightly from the previous year. For both years, it reported Authorized Numbers of exports of small arms and of imports of major conventional weapons and small arms. However, in 2016 it also reported light weapons imports and exports.

Though Estonia did not report any exports of major conventional weapons or light weapons or imports of light weapons, it indicated its practice was to report Authorized Numbers. In 2016 it had also reported light weapons imports and exports.

Transfer summary - 2017: Export Data

- Estonia reported Authorized exports to 14 countries in 2017. Of these, 13 were ATT States Parties and one was a non-member (Kyrgyzstan).
- Estonia reported Authorized export of a total of 424 small arms in 2017. These covered three sub-categories, including ‘Other’. Reported exports were mostly rifles and carbines (83 per cent).

Transfer summary - 2017: Import Data

- Estonia reported Authorized imports from 16 countries in 2017.
- Of these, 13 were ATT States Parties, two were Signatories and one was a non-member (Belarus).
- Of major weapons, Estonia reported Authorized import of 14 armoured combat vehicles from the Netherlands.
- Estonia reported Authorized imports of a total of 4,668 small arms in 2017, mostly of revolvers and self-loading pistols (83 per cent).

Good practices:

Estonia provided a description of the imports within one sub-category of major conventional weapons.

Room for improvement:

In respect of small arms imports and exports, where there was more than one exporting or importing state involved Estonia aggregated all countries together within each sub-category, making it impossible to identify the quantities of small arms that were exported to, or imported from, each country.

Was a ‘nil’ report submitted for exports or imports in 2017?

No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?

No

Was an Annual Report submitted by 31 May 2018?

No – missed deadline

Was the Annual Report made public?

Yes

Was an Annual Report submitted by 31 May 2018?

No – missed deadline

ATT MONITOR 2019
FINLAND

Was an Annual Report submitted by 31 May 2018?  
No, missed deadline

Was the Annual Report made public?  
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  
No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  
Yes

Good practices:  
Finland provided clear, disaggregated data for every reported export and import in 2017. Finland provided some descriptions of items for major weapon exports and imports, and for small arms imports.

Room for improvement:  
Finland excluded some data for ‘commercial sensitivity/national security-related’ reasons and did not specify where or how much information was withheld.

Transfer summary - 2017: Export Data  
- Finland reported exports to 39 countries and territories in 2017. Of these, 30 were ATT States Parties, three were Signatories and five were non-members (Algeria, Canada, Jordan, Oman and Uzbekistan).
- For major weapons, Finland reported the export of five patrol boats to the United Arab Emirates and five patrol boats to Oman.
- In total, Finland reported the export of 1,413 SALW items, all of which were rifles and carbines. The main importing states were the United States (24 per cent), South Africa (18 per cent) and Poland (8 per cent).

Transfer summary - 2017: Import Data  
- Finland reported major conventional weapons and small arms imports from only one ATT State Party. It reported no imports from Signatories or non-members.
- For major conventional weapons, Finland reported the import of 20 battle tanks from the Netherlands.
- Finland reported the import of 51 light machine guns from the Netherlands. Details provided specify that these were machine guns for tanks.

Finland’s reporting practice changed slightly in its 2017 Annual Report from 2016. Finland reported Actual Numbers of exports and imports of major weapons and small arms. In 2016 Finland reported the import of light weapons and not small arms.

Finland also reported imports from one non-UN member in 2017 (Greenland).
FRANCE

Was an Annual Report submitted by 31 May 2018? No – missed deadline
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? Unspecified – France used a national reporting template
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? Unspecified – France used a national reporting template

Good practices:
Although France used a national reporting template, the format used and the information provided allow for comparison with States Parties that use the official reporting template.

France provided descriptions of items for all reported exports and imports. These descriptions named the sub-category of weapons and, in some cases, provided additional details such as calibre.

Room for improvement:
Because France used a national template, it is not clear whether any data has been withheld for ‘commercial sensitivity/national security-related’ reasons.

The national template used by France does not provide space for comments beyond descriptions to include information on end-use and/or end-user.

Transfer summary - 2017: Export Data
• France reported exports to 35 countries in 2017. Of these, 18 were ATT States Parties, five were Signatories, and 12 were non-members (Bolivia, Canada, Egypt, India, Indonesia, Kenya, Kuwait, Oman, Saudi Arabia, Tunisia, Turkmenistan and Uganda).
• France reported a total of 1,168 major conventional weapons items exported in 2017, covering six categories. Most items were either armoured combat vehicles (56 per cent) or missiles and missile launchers (29 per cent). The single largest export transaction for major conventional weapons reported was for 468 armoured combat vehicles to Saudi Arabia.
• The main importers of major conventional weapons from France were Saudi Arabia (51 per cent of items), United Kingdom (12 per cent) and Kuwait (9 per cent).
• For SALW, France reported the export of a total of 935 items in 2017, covering six sub-categories. 79 per cent of France’s reported SALW exports in 2017 were rifles and carbines.
• The main importers of SALW from France were Saudi Arabia (69 per cent), United Kingdom (15 per cent) and the United States (8 per cent). The single largest export transaction for SALW reported was for 520 rifles and carbines to Saudi Arabia.

Transfer summary - 2017: Import Data
• France reported imports from seven countries in 2017. Of these, six were ATT States Parties and one was a Signatory.
• France reported the import of only SALW in 2017. In total, it reported the import of 7,755 SALW items spanning seven sub-categories.
• The majority of France’s reported imports of SALW in 2017 were assault rifles (77 per cent of reported items).
• The main exporters of SALW to France in 2017 were Germany (85 per cent of items) and Belgium (9 per cent). The largest single import transaction reported by France was for 5,468 assault rifles from Germany.

Reporting practice summary - 2017
France did not change its reporting practice for its 2017 Annual Report. As in 2016, it used a national reporting template.
France reported Actual Numbers of exports of major conventional weapons exported and exports and imports of SALW. France did not report data for imports of major conventional weapons.
**GEORGIA**

**Was an Annual Report submitted by 31 May 2018?** Yes

**Was the Annual Report made public?** Yes

**Was a ‘nil’ report submitted for exports or imports in 2017?** No

**Was data withheld for ‘commercial sensitivity/national security-related’ reasons?** Unspecified – Not ticked

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**Good practices:**
Georgia submitted its first ATT Annual Report.

Georgia provided clear, disaggregated information on its exports and imports of major conventional weapons in 2017.

Georgia provided descriptions of most of its exports and imports of major conventional weapons in 2017.

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**Room for improvement:**
Georgia did not tick the box to indicate if it had excluded some data for ‘commercial sensitivity/national security-related’ reasons.

Georgia did not provide definitions of the terms ‘export and import’, nor did it specify the cut-off date for its report.

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**Transfer summary - 2017: Export Data**

- Georgia reported Authorized exports of major conventional weapons to two countries. One country was a State Party, and the other was a non-member (Saudi Arabia).
- Georgia reported Authorized exports of 53 armoured combat vehicles to Saudi Arabia, and 50 120mm mortar weapon systems, in the large-calibre artillery systems sub-category, to Croatia.
- Georgia reported no exports of SALW.

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**Transfer summary - 2017: Import Data**

- Georgia reported Authorized imports of major conventional weapons from one State Party in 2017.
- Georgia reported Authorized imports of 4,200 anti-hail rockets, in the missiles & missile launchers sub-category, from Serbia.
- Georgia reported no imports of SALW.

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**Reporting practice summary - 2017**

This is Georgia’s first ATT Annual Report.

Georgia reported **Authorized Numbers** of major conventional weapons exports and imports during 2017. It did not report exports or imports of SALW.
GERMANY

Was an Annual Report submitted by 31 May 2018?  Yes

Was the Annual Report made public?  Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  Yes

Good practices:
Germany provided clear, disaggregated data for each reported export and import in 2017.
In some instances, Germany provided comments on transfers. For example, it indicated that imports of 3,000 hand-held under-barrel and mounted grenade launchers from France were for destruction.

Room for improvement:
Germany excluded some data for ‘commercial sensitivity/national security-related’ reasons, having not done so previously for 2016. It did not specify where or how much information was withheld.
Germany only provided comments on the transfer in a few select cases, and did not provide any descriptions of items transferred.

Transfer summary - 2017: Export Data
• Germany reported exports to 44 destinations in 2017. Of these, 31 were ATT States Parties, four were Signatories and nine were non-members (Algeria, Canada, Egypt, India, Indonesia, Jordan, Oman, Qatar and Tunisia).
• Germany reported exports of 279 major conventional weapons items in 2017, covering seven categories. Of these, 62 per cent were missiles and missile launchers and includes six MANPADS indicated in a comment to be comprised of ‘component parts’. The largest single reported export of major conventional weapons was 149 missiles to Republic of Korea.
• Germany reported exports of 31,415 SALW items, covering eight sub-categories, with 48 per cent of exported SALW items sub-machine guns and 45 per cent assault rifles. The main importers of Germany’s SALW exports were France (47 per cent of reported items), India (21 per cent) and Sweden (7 per cent).

Transfer summary - 2017: Import Data
• Germany reported imports from 15 countries in 2017. Of these, 12 were ATT States Parties, two were Signatories and one was a non-member (Qatar).
• The only major conventional weapons imports reported by Germany were two armoured combat vehicles from Austria and four missiles and missile launchers from Sweden.
• Germany reported the import of a total of 4,637 SALW items in 2017, covering nine sub-categories. In comments, Germany indicated that 65 per cent of these items were for destruction and 24 per cent were temporary transfers.
• The main exporters of arms to Germany were France (65 per cent of reported items), Austria (26 per cent) and Belgium (6 per cent). The largest transactions were for 3,000 hand-held under-barrel and mounted grenade launchers for destruction from France, and 757 assault rifles from Austria (described as temporary).

REPORTING PRACTICE SUMMARY - 2017
Germany’s reporting practice changed in 2017. It changed its response provided under ‘Scope of report’ to indicate that, contrary to its 2016 report, in 2017 information had been withheld on grounds of commercial sensitivity and/or national security.
In 2017, Germany reported Authorized Numbers of imports of major conventional weapons, whereas in 2016 it had reported Actual Numbers.
In 2017, Germany continued its practice of reporting Actual Numbers of major conventional weapons exports, but reported on Authorized Numbers of SALW exports and imports.

GHANA
GREECE

Was an Annual Report submitted by 31 May 2018? No, missed deadline

Was the Annual Report made public? No, report kept confidential

GRENADE


GUATEMALA


GUINEA


GUAYANA

HUNGARY

Was an Annual Report submitted by 31 May 2018?  
No, missed deadline

Was the Annual Report made public?  
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  
No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  
No

Good practices:

- Hungary provided clear, disaggregated data for each reported import and export in 2017.

- Hungary provided descriptions of items for most exports and imports, and supplied some comments on transfers, including designating some as re-exports.

Room for improvement:

- Hungary could provide full names for the countries designated as exporting or recipient states, as the abbreviations used are not defined.

Transfer summary - 2017: Export Data

- Hungary reported exports to 11 destinations in 2017. Of these, nine were ATT States Parties and two were non-members (Canada and Saudi Arabia). Hungary was not the state of origin for all exports it reported in 2017 (see below).

- Hungary reported only one export of major conventional weapons, which was 50 armoured combat vehicles to Saudi Arabia. As indicated in comments, this was a re-export from Serbia, and the state of origin was Czech Republic.

- Hungary reported the export of a total of 286 SALW items, covering six sub-categories. 59 per cent of reported SALW exports were rifles and carbines. The largest single export was 68 rifles and carbines to Croatia.

Transfer summary - 2017: Import Data

- Hungary reported imports from 15 countries in 2017. Of these, 13 were ATT States Parties and two were Signatories.

- Hungary reported the Actual import of a total of 259 major conventional weapons items in 2017. 77 per cent were large-calibre artillery systems and 23 per cent were armoured combat vehicles. The largest transaction was for the import, for subsequent re-export, of 200 82mm mortars from Bosnia and Herzegovina.

- Hungary reported the Actual import of a total of 2,980 SALW covering seven sub-categories. 65 per cent of these reported imports were rifles and carbines, which included those for sporting and hunting purposes.

- The main exporters of SALW to Hungary in 2017 were Germany (22 per cent of reported items), Czech Republic (16 per cent), and Slovakia (15 per cent).

REPORTING PRACTICE SUMMARY - 2017

Hungary’s reporting practice for its 2017 Annual Report was largely the same as in the previous year. In 2017, it reported Actual Numbers of exports and imports of major conventional weapons and SALW. In 2016, it reported Authorized Numbers of exports of major conventional weapons items.

ICELAND

IRELAND

Was an Annual Report submitted by 31 May 2018?  
No – missed deadline

Was the Annual Report made public?  
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  
No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  
Not ticked

Good practices:
Ireland provided descriptions and comments on the end-use and/or end-user for most of its exports of SALW in 2017.
Ireland reported ‘nil’ exports and imports directly in the categories and sub-categories in which transfers did not occur, rather than indicating it was submitting ‘nil’ exports or imports reports on the front page of its report, and then reporting transfer data, as it did for imports in 2016.
Ireland reported the Value of imports of small arms as well as the Number of items imported in 2017.

Room for improvement:
Ireland did not indicate whether it had excluded some data for ‘commercial sensitivity/national security-related’ by ticking the box, therefore it is unclear if any information was withheld.
Ireland aggregated the final importing countries under some small arms sub-categories, so it is impossible to analyse how many items within reported transfers were exported to which specific country.

Transfer summary - 2017: Export Data
• Ireland reported exports to seven countries or regional organizations in 2017. Of these, five were ATT States Parties, one was a Signatory and one was a non-member (Canada).
• Ireland did not report exports of major conventional weapons in 2017.
• Ireland reported the export of 860 SALW items, covering three sub-categories, including ‘Other’. 76 per cent of SALW exports reported by Ireland in 2017 were rifles and carbines.
• In some cases, it aggregated information for importing countries for this sub-category so it is unclear to where these items were exported.

Transfer summary - 2017: Import Data
• Ireland reported imports of SALW from five countries or regional organizations in 2017. Of these, two were ATT Signatories and two were non-members (Canada and China).
• Ireland reported the import of a total of 1,403 SALW items, spanning four sub-categories, including ‘Other’ in both small arms and light weapons categories. The total value of these imports was reported to be €282,451 (US$318,291).
• The largest reported import was of 1,210 small arms in the ‘Other’ category from EU member states.

22 Ireland also reported exports to ‘EU member states’ as a single entry. It is unclear if exports were made to some or all states in this group.
23 Ireland also reported imports from ‘EU member states’ as a single entry. It is unclear if imports were from some or all states in this group.
24 Ireland did not specify which currency it used for reported values of transfers. For this analysis, the ATT Monitor has assumed the currency to be euros. Currency conversion via OECD Data, reflecting 2017 annual conversion rate: https://data.oecd.org/conversion/exchange-rates.htm.
ITALY

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? Yes

Good practices: Room for improvement:

Good practices:

Reporting practice summary - 2017
Italy’s reporting practice in 2017 was the same as for the previous year. Italy reported Authorized Numbers of exports and imports of major conventional weapons and SALW.

The reported cut-off date for Italy’s 2017 Annual Report was 10 May 2018, which presumably covers transfers in 2018 through 10 May. However, the terms ‘export’ and ‘import’ were defined as ‘Other’ – ‘Licenses authorized in 2017’.

Transfer summary - 2017: Import Data

• Italy reported the import of six major conventional weapons items in 2017, all of which were large-calibre artillery systems. Italy did not report the source of these weapons.
• Italy provided no descriptions or comments provided in relation to any reported transfers.
• Italy excluded some data for ‘commercial sensitivity/national security-related’ reasons but did not specify where or how much information was withheld.

Transfer summary - 2017: Export Data
• Italy reported the export of 1,165 major conventional weapons items in 2017, covering seven categories. Missiles and missile launchers accounted for 91 per cent of exports. Italy did not report the export destinations for these weapons.
• Italy reported the export of 107,208 SALW items covering six sub-categories, including ‘Other’. 81 per cent of these items were revolvers and self-loading pistols.
• Italy reported the destinations for its SALW exports in a separate annex so it is unclear which types were transferred to which country.
• In total, Italy reported exports of SALW to 42 countries in 2017. Of these, 19 were ATT States Parties, nine were Signatories and 14 were non-members (Algeria, Bolivia, Canada, Indonesia, Iraq, Kenya, Kuwait, Morocco, Oman, Pakistan, Saudi Arabia, Sri Lanka, Tunisia and Vietnam).
• The main importers of SALW were Mexico (29 per cent of reported exports), Iraq (27 per cent), and Argentina (12 per cent).

JAMAICA


25 Italy did not specify which types of weapons were transferred to each country in the annex, and it is unclear what types of small arms Italy exported to which destination.
JAPAN

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Japan provided clear, disaggregated data for its imports and exports of SALW and for its imports of major conventional weapons.
Japan provided descriptions for imports of major conventional weapons.

Room for improvement:
Japan’s use of HS Codes for reporting its SALW exports and imports meant that the data provided did not correspond directly to the categorization within the reporting template, making it difficult to comparatively analyse Japan’s transfer data.

Transfer summary - 2017: Export Data
• Japan reported small arms exports to 12 countries in 2017. Of these, 11 were ATT States Parties and one was a Signatory.
• In total, Japan reported the export of 107,875 small arms. The majority of these were exported to the United States (70 per cent) and Belgium (23 per cent).

Transfer summary - 2017: Import Data
• Japan reported the import of 15 armoured combat vehicles and two manned combat aircraft from the United States in 2017.
• Japan reported SALW imports from 12 countries in 2017. Of these, 10 were ATT States Parties and two were Signatories.
• In total, Japan reported the import of 3,188 SALW worth ¥15.5m (US$138,188). The main exporters of SALW to Japan were Italy (29 per cent), the United States (23 per cent) and Germany (21 per cent).

Reporting practice summary - 2017
As in the previous year, in 2017 Japan provided details of Actual Numbers of exports of small arms and imports of SALW in two lists attached to its 2017 Annual Report. It also provided Values for its SALW imports. Information on small arms exports and SALW imports was organized according to the Harmonized Commodity Description and Coding System (HS Code) of the World Customs Organization.

In 2016, Japan reported that it had made no exports or imports of major conventional weapons, however in 2017 Actual Numbers were provided for imports of major conventional weapons under two categories within the reporting template.
LATVIA

Was an Annual Report submitted by 31 May 2018? **Yes**

Was the Annual Report made public? **Yes**

Was a ‘nil’ report submitted for exports or imports in 2017? **No**

Was data withheld for ‘commercial sensitivity/national security-related’ reasons? **No**

**Good practices:**
Latvia provided clear, consistent and disaggregated data for each reported export and import. In some cases Latvia provided both the Number and Value of SALW items exports and imports.

**Room for improvement:**
Latvia did not provide descriptions of items or comments on any of its exports, and did so for only a select few of its imports.

**Transfer summary - 2017: Export Data**
- Latvia reported Actual exports of SALW to three ATT States Parties in 2017.
- Latvia reported the export of 221 SALW items, covering three sub-categories. The majority were heavy machine guns to Mali, where Slovakia was the state of origin (54 per cent), and rifles and carbines for Lithuania, where Germany was the state of origin (42 per cent).
- The total value of SALW exports in 2017 was €256,004 (US$288,489).27

**Reporting practice summary - 2017**
Latvia reported Actual Numbers of exports and imports of SALW items, as well as of imports of major conventional weapons in 2017. Values were provided for some all small arms exports and most small arms imports. It did not report exports of major conventional weapons.

**Transfer summary - 2017: Import Data**
- In total, Latvia reported imports from 13 countries in 2017. Of those, 11 were ATT States Parties and two were Signatories.
- Latvia reported two imports of major conventional weapons in 2017 for 35 armoured combat vehicles from United Kingdom and four large-calibre artillery systems from Austria, with the United States as the state of origin for transfer of large-calibre artillery systems.
- Latvia reported the import of a total of 5,291 SALW items, covering four sub-categories. The majority were revolvers and self-loading pistols (71 per cent) and rifles and carbines (22 per cent).
- The main exporters of SALW to Latvia were Austria (70 per cent) and Germany (13 per cent).

LESOTHO


LIBERIA


27 Latvia did not specify which currency it used for reported values of transfers. For this analysis, the ATT Monitor has assumed the currency to be euros. Currency conversion via OECD Data, reflecting 2017 annual conversion rate. https://data.oecd.org/conversion/exchange-rates.htm.
### Liechtenstein

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<tr>
<td>Was a ‘nil’ report submitted for exports or imports in 2017?</td>
<td>No</td>
</tr>
<tr>
<td>Was data withheld for ‘commercial sensitivity/national security-related’ reasons?</td>
<td>No</td>
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**Good practices:**

Liechtenstein provided descriptions of items and comments on the transfer of reported exports and imports. It noted in the comment section that all SALW exports and imports in 2017 were non-commercial.

**Room for improvement:**

Liechtenstein did not report on voluntary national categories.

**Transfer summary - 2017: Export Data**

- Liechtenstein reported only one export in 2017 to one ATT State Party, the transfer of three hunting rifles to Germany.

**Reporting practice summary - 2017**

Liechtenstein’s reporting practice remained the same in 2017 as for the previous year. It reported **Actual Numbers** of exports of SALW items and **Authorized Numbers** of imports of SALW items. It did not report the export or import of any major conventional weapons.

**Transfer summary - 2017: Import Data**

- Liechtenstein reported the import of 21 SALW items in 2017 from two countries, both of which were ATT States Parties.
- These 21 items spanned two sub-categories, revolvers and self-loading pistols and rifles and carbines.
LITHUANIA

Reporting practice summary - 2017
Lithuania’s reporting practice changed slightly in 2017. In 2016, it reported Authorized Numbers and Values of SALW exports and imports. In 2017, however, it reported Actual Numbers of all exports and imports of major conventional weapons and SALW. It also reported Values of all SALW exports and of some major conventional weapons and SALW imports.

Transfer summary - 2017: Export Data
• Lithuania reported exports to five countries in 2017. Of those, four were ATT States Parties and one was a Signatory.
• Lithuania reported one export of major conventional weapons, one armoured combat vehicle to the United States.
• Lithuania reported the export of 224 SALW items, all of which were rifles and carbines. The total value of these items was €332,534 (US$374,723). Of these, 56 per cent of these items were exported to Latvia.

Transfer summary - 2017: Import Data
• Lithuania reported imports from 21 countries in 2017. Of these, 17 were ATT States Parties, three were Signatories and one was a non-member (Canada).
• Lithuania reported the import of 56 major conventional weapons, spanning three categories. 54 per cent of these items were large-calibre artillery systems imported from Israel, and 36 per cent were missiles and missile launchers (specifically, MANPADS) from Poland.
• Lithuania reported the import of a total of 11,424 SALW items, spanning six sub-categories. 80 per cent were rifles and carbines and 10 per cent were hand-held under-barrel and mounted grenade launchers.
• The main exporters of SALW to Lithuania were Germany (76 per cent), Austria (6 per cent) and Finland (6 per cent).
**LUXEMBOURG**

| Was an Annual Report submitted by 31 May 2018? | Yes |
| Was the Annual Report made public? | Yes |
| Was a 'nil' report submitted for exports or imports in 2017? | Yes (for exports) |
| Was data withheld for 'commercial sensitivity/national security-related' reasons? | No |

**Reporting practice summary - 2017**

Luxembourg submitted a 'nil' import report for imports of major conventional arms and SALW in 2017. It reported Actual and Authorized Numbers for SALW exports and did not report any exports of major conventional weapons. This was in contrast to 2016, when it submitted 'nil' reports for both export and import of all arms under the scope of the ATT.

Luxembourg was not the state of origin for its exports in 2017.

**Transfer summary - 2017: Export Data**

- Luxembourg reported SALW exports to two countries, one ATT Signatory and one non-member (Canada). Luxembourg was not the country of origin for any of these transfers.
- Luxembourg reported the export of five SALW items, one revolver and pistol, and four rifles and carbines.

**Good practices:**

- Luxembourg provided clear, consistent and disaggregated data for each reported export, including the state of origin for each item that was exported.
- Luxembourg provided descriptions for all exported items.

**Room for improvement:**

| Was a 'nil' report submitted for exports or imports in 2017? | Yes (for exports) |
| Was data withheld for 'commercial sensitivity/national security-related' reasons? | No |

**Transfer summary - 2017: Import Data**

- Luxembourg submitted a 'nil' report for imports.

**MADAGASCAR**

| Was an Annual Report submitted by 31 May 2018? | Yes |
| Was the Annual Report made public? | No, report kept confidential |

**Mali**

**MALTA**

**Was an Annual Report submitted by 31 May 2018?**  Yes

**Was the Annual Report made public?**  Yes

**Was a ‘nil’ report submitted for exports or imports in 2017?**  No

**Was data withheld for 'commercial sensitivity/national security-related' reasons?**  No

### Good practices:
- Malta submitted its first ATT Annual Report.
- Malta reported both Numbers and Values of SALW exports.

### Reporting practice summary - 2017
This is Malta’s first ATT Annual Report.

It did not report any exports or imports of major conventional weapons. It reported Authorized Numbers and Values of small arms exports and Authorized Numbers of small arms imports. Malta also reported in the ‘Others’ sub-category under SALW but did not specify whether the reported number is for Authorized or Actual imports.

Malta indicated that it defines the terms ‘export’ and ‘import’ as ‘Physical transfer of items across a national border’.

### Transfer summary - 2017: Export Data
- Malta reported exports to eight countries in 2017. Of these, three were ATT States Parties, two were Signatories and three were non-members (India, Oman and Somalia).
- Malta did not report exports of major conventional weapons.
- Malta reported the export of 151 small arms in 2017, 64 per cent of which were rifles and carbines, and 36 per cent were revolvers and self-loading pistols. It was not the state of origin for any of its reported exports.

### Transfer summary - 2017: Import Data
- Malta reported imports from 14 destinations in 2017. Of these, five were ATT States Parties, four were Signatories and two were non-members (Canada and India).
- Malta did not report imports of major conventional weapons.
- Malta reported the import of 9,236 small arms in 2017, spanning three sub-categories, including ‘Others’. 71 per cent of imports were of rifles and carbines, and 23 per cent were of revolvers and self-loading pistols.

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**MAURITANIA**


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29 Malta also reported imports from two non-UN members in 2017 (Hong Kong and Taiwan) as well as from the European Union.
MAURITIUS

Was an Annual Report submitted by 31 May 2018?  Yes
Was the Annual Report made public?  Yes
Was a ‘nil’ report submitted for exports or imports in 2017?  No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  Yes

Good practices:
Mauritius’ export and import reports matched what it indicated it would provide in its content page.

Room for improvement:
Mauritius excluded some data for ‘commercial sensitivity/national security-related’ reasons and did not specify where or how much information was withheld.
Mauritius did not name any final importing or exporting countries in its 2017 Annual Report.
Mauritius provided aggregate totals for its exports and imports of SALW items. It did not indicate the relevant sub-categories to which these weapons belonged.

Transfer summary - 2017: Export Data
- Mauritius reported the export of five small arms but did not indicate the final importing countries or the relevant sub-categories.

Transfer summary - 2017: Import Data
- Mauritius reported the import of 403 small arms and of six light weapons, but did not specify the exporting countries or the relevant sub-categories.

Reporting practice summary - 2017
Mauritius’ reporting practice in 2017 changed in some aspects from 2016. It changed its definition of the terms ‘export’ and ‘import’ from the previous year. In 2016 it defined ‘export’ as ‘Transfer of control’ and ‘import’ as ‘Transfer of title’. In 2017 it defined ‘export’ as ‘Physical transfer of items across a national border’ and ‘import’ as ‘Physical transfer of items across a national border’ and ‘Transfer of Title’ and ‘Transfer of control’.
As in the previous year, in 2017 Mauritius did not report any exports or imports of major conventional weapons although it did report Actual Numbers of SALW exports and import.
MEXICO

Reporting practice summary - 2017

Mexico’s reporting practice changed slightly for 2017. In 2017, it reported Actual Numbers of exports of small arms and of imports of major conventional weapons and SALW.30 In 2016, Mexico did not report any exports.

Mexico included its definition of the term ‘export’ in 2017 as ‘Physical transfer of items across a national border’, ‘transfer of title’ and ‘transfer of control’, after providing no definition in 2016.

Transfer summary - 2017: Import Data

• Mexico reported imports from 15 countries in 2017. Of these, 12 were ATT States Parties and three were Signatories.
• For major conventional weapons, Mexico reported the import of 127 missiles and missile launchers (MANPADS) from the United States.
• Mexico reported the import of a total of 36,145 SALW items in 2017, covering seven sub-categories, including ‘Others’ for both small arms and light weapons. 71 per cent of those were revolvers and self-loading pistols.
• The main exporters of SALW to Mexico in 2017 were Italy (26 per cent of items) the United States (19 per cent) and Israel (18 per cent).

Transfer summary - 2017: Export Data

• Mexico reported exports to seven countries. Of these, four were ATT States Parties, one was a Signatory and two were non-members (Canada and Nicaragua).
• Mexico did not report exports of major conventional weapons.
• Mexico reported the export of 5,800 small arms in 2017, all of which were rifles and carbines, specifically hunting and sporting rifles. The main importers of small arms from Mexico in 2017 were the United States (52 per cent), Guatemala (14 per cent) and Canada (14 per cent).

Good practices:

Mexico provided clear and disaggregated data for each reported import in 2017.

Mexico provided descriptions of items and comments on the transfers for each reported export and import in 2017, clarifying the end-use and/or end-user in each case.

Room for improvement:

Mexico did not report any imports under voluntary national categories, such as ammunition.

30 Two SALW imports were reported as Authorized Numbers.
MOLDOVA, REPUBLIC OF

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? Unspecified, not ticked

Good practices:
Moldova reported comments on the end-use and/or end-user for each sub-category of imports and exports.

Room for improvement:
Moldova aggregated data on exporting states for each sub-category of its reported imports of small arms.

Transfer summary - 2017: Export Data
- Moldova reported the export of 20 revolvers and self-loading pistols and five rifles and carbines, both to one non-ATT member (Russia) for civil use.

Reporting practice summary - 2017
Moldova’s reporting practice remained the same in 2017 as it was in 2016. It did not report exports or imports of major conventional weapons. It reported Authorized Numbers of small arms exports and imports.

Transfer summary - 2017: Import Data
- Moldova reported imports from seven countries in 2017. Of these, five were ATT States Parties, one was a Signatory and one was a non-member (Russia).
- Moldova reported the import of 2,824 small arms. Of these, 75 per cent were revolvers and self-loading pistols, and 25 per cent were rifles and carbines.
- Information on exporting states of Moldova’s imports of small arms was aggregated, so it is impossible to determine the breakdown of quantities among the various exporters.

MONACO

Montenegro provided descriptions and comments for most of its exports and imports in its 2017 Annual Report. Montenegro provided descriptions for exported and imported items reported under the sub-category 'Others', which included grenades and mines.

### Room for improvement:
Montenegro did not specify a cut-off date for its report.

Montenegro aggregated the final importing and exporting states in some cases, making it impossible to determine to where the items were exported or from whom they were imported.

Montenegro alternated between reporting values as US dollars and Euros depending on the transfer, making it difficult to identify the overall value of its exports.

### Transfer summary - 2017: Export Data
- Montenegro reported exports to 11 countries in 2017. Of those, five were ATT States Parties, four were Signatories and two were non-members (Democratic Republic of the Congo and Saudi Arabia).
- Montenegro reported one export of major conventional weapon items, six large-calibre artillery systems to Saudi Arabia.
- Montenegro reported the export of 73,991 items of SALW spanning seven sub-categories, including the category 'Others'. In terms of numbers of items, 94 per cent of exports were from the 'Others' sub-category, where one export of hand grenades to United Arab Emirates accounted for 67 per cent of reported SALW exports, and exports of mines to Saudi Arabia accounted for 27 per cent of items.

### Transfer summary - 2017: Import Data
- Montenegro reported imports from ten countries in 2017. Of those, eight were ATT States Parties and two were Signatories.
- Montenegro did not report any imports of major conventional weapons.
- Montenegro reported the import of 8,251 SALW items in 2017, spanning four sub-categories, including 'Others'. In terms of numbers of items, 50 per cent of these were revolvers and self-loading pistols, and 31 per cent were reported in the sub-category 'Others', including destructive mines from Serbia accounting for 19 per cent of Montenegro’s SALW imports.
- The total value of reported SALW imports was €4m (US$4.5m).
NETHERLANDS

Was an Annual Report submitted by 31 May 2018?  No

Was the Annual Report made public?  Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  No

Good practices:

The Netherlands provided clear and disaggregated data for each reported export and import in 2017.

The Netherlands provided descriptions for selected items that were imported and exported in 2017.

The Netherlands did not report on voluntary national categories in its 2016 Annual Report, but it did provide details and links to its national report as well as monthly data on export licenses in its 2017 report.

Room for improvement:

The Netherlands only provided a comment for one export of major conventional weapons.

Transfer summary - 2017: Export Data

- The Netherlands reported exports to 28 countries and territories in 2017.
- Of these, 23 were ATT States Parties, one was a Signatory and two were non-members (Canada and Jordan).33
- The Netherlands reported the export of 94 major conventional weapons items, covering four categories. It indicated that it was not the state of origin for most reported major conventional weapon exports.
- The Netherlands reported the export of 1,823 small arms in 2017, covering four sub-categories.
- The vast majority of reported small arms exports were either revolvers and self-loading pistols (47 per cent) or rifles and carbines (42 per cent).
- The majority of the Netherlands’ exports of small arms were to Belgium (57 per cent), Germany (14 per cent) and the Finland (6 per cent).

Transfer summary - 2017: Import Data

- The Netherlands reported imports from 26 countries in 2017.
- Of these, 22 were ATT States Parties, three were Signatories and one was a non-member (Canada).
- For major conventional weapons, the Netherlands reported the import of 38 armoured combat vehicles from Australia and 26 missiles and missile launchers (MANPADS) from four exporting countries.
- In total, the Netherlands reported the import of 40,592 SALW, spanning seven sub-categories, including ‘Others’.
- The majority of SALW imports were revolvers and self-loading pistols (51 per cent) and rifles and carbines (43 per cent).
- The major exporters of SALW to the Netherlands were Austria (43 per cent), Portugal (33 per cent) and Germany (10 per cent).

In its 2017 Annual Report, the Netherlands reporting practice remained the same as for the previous year.

The Netherlands reported on Actual Numbers of major conventional weapons and small arms exports and imports in 2017. The Netherlands was the state of origin for most, but not all, of its reported exports.

33 The Netherlands also reported exports to two non-UN members (Bonaire and Curacao).
NEW ZEALAND

Was an Annual Report submitted by 31 May 2018?  Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
New Zealand provided clear, disaggregated data for each reported export and import in 2017.
New Zealand reported exports and imports under voluntary national categories, and provided extensive information in Annex 2 to clarify specific national definitions of Category VIII weapons (SALW), and of its Voluntary National Categories utilized in 2017.

Room for improvement:
New Zealand did not provide any comments or descriptions on transfers that took place in 2017.

Transfer summary - 2017: Export Data
- New Zealand reported exports to 32 countries and territories in 2017. Of these, 15 were ATT States Parties, five were Signatories and eight were non-members (Canada, China, Fiji, India, Papua New Guinea, Russia, Sri Lanka and Tonga).
- New Zealand did not report the export of any major conventional weapons for 2017.
- New Zealand reported the export of 1,097 small arms for 2017, covering four sub-categories. The majority of these were rifles and carbines (57 per cent) and revolvers and self-loading pistols (41 per cent). The majority of small arms exports were to Australia (30 per cent) and China (24 per cent).
- Under ‘Section C: Voluntary National Categories,’ New Zealand also reported the export of 360 shotguns to 16 destinations.

Transfer summary - 2017: Import Data
- New Zealand reported imports from 37 countries and territories in 2017. Of these, 20 were ATT States Parties, nine were Signatories and six were non-members (Canada, China, Fiji, Papua New Guinea, Russia and Tonga).
- New Zealand did not report imports of major conventional weapons.
- In total, New Zealand reported the import of 10,911 SALW items, spanning eight sub-categories. The vast majority were rifles and carbines (82 per cent).
- The main exporters of SALW to New Zealand were the United States (55 per cent) and Finland (20 per cent).
- Under ‘Section C: Voluntary National Categories,’ New Zealand also reported the import of 2,022 shotguns from 19 destinations.

34 New Zealand also reported exports to four non-UN members (Cook Islands, French Polynesia, New Caledonia and Niue).
35 There is a minor discrepancy in New Zealand’s reporting of its exports of ‘Rifles and carbines’. It reported an aggregate of 629 items but total exports add up to 626.
36 New Zealand also reported imports from two non-UN members (French Polynesia and New Caledonia).
37 There is a minor discrepancy in New Zealand’s reporting of its imports of ‘Revolvers and self-loading pistols. It reported an aggregate of 1,449 items but total imports add up to 1,487.
NIGER


NIGERIA


NORWAY

Reporting practice summary - 2017
Norway’s reporting practice in its Annual Report for 2017 was the same as that for 2016.

Norway reported **Actual Numbers** of exports of major conventional weapons and SALW, as well as of imports of major conventional weapons and small arms in 2017. It reported the **Value** of its exports of ammunition under Voluntary National Categories.

Transfer summary - 2017: Export Data
- Norway reported disaggregated exports to two countries (Estonia and Iceland) in 2017, both of which were ATT States Parties. It also reported aggregated quantities of major conventional weapons and SALW to unspecified countries.
- Of major conventional weapons, Norway reported the export of seven armoured combat vehicles to Estonia, as well as 74 missiles and missile launchers to ‘Various’ unspecified destinations.
- Norway reported the export of 1,348 SALW, but reported the final importing countries mostly as ‘Various’ without clarification.
- Norway also reported the export of NOK570m (US$68.9m)\(^{38}\) worth of ammunition in 2017, but reported the final importing countries as ‘Various’ without clarification.

Transfer summary - 2017: Import Data
- Norway reported imports from three countries. Two were ATT States Parties and one was a Signatory.
- Of major conventional weapons, Norway reported the import of 17 armoured combat vehicles from Sweden and three manned combat aircraft from the United States.
- Norway reported the import of 20 small arms, all of which were revolvers and self-loading pistols from Germany.

Good practices:
Norway provided selective descriptions of items and comments on transfers in 2017, including a reference to a paper submitted to parliament detailing statistics on ammunition exports.

Norway reported aggregate exports of ammunition under Voluntary National Categories.

Room for improvement:
Norway aggregated the names of the final importing countries for most of its exports of major conventional weapons, SALW and ammunition, often noting that the final destinations were ‘Various’, making it impossible to analyse the breakdown of the exports by destination.

Norway excluded some data for ‘commercial sensitivity/national security-related’ reasons but beyond this did not specify where or how much information was withheld.

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? Yes

\(^{38}\) Currency conversion via OECD Data, reflecting 2017 annual conversion rate. [https://data.oecd.org/conversion/exchange-rates.htm](https://data.oecd.org/conversion/exchange-rates.htm)
PANAMA

Reporting practice summary - 2017
Panama made its 2017 report publicly available, after keeping its 2016 report confidential.
Panama did not report any imports of major conventional weapons. It reported Authorized Numbers of small arms imports.

Transfer summary - 2017: Import Data
Panama reported the import of 78 revolvers and self-loading pistols in 2017. No information was provided regarding the source of these items.

Good practices:
Panama made its 2017 Annual Report publicly available.

Room for improvement:
Panama did not provide a definition for the terms ‘export’, by not ticking any relevant boxes, or ‘import’, by selecting ‘no’ for all elements of the definition without providing additional clarification.
Panama did not provide any information regarding the exporting states in its reported imports.

Was an Annual Report submitted by 31 May 2018?
Yes

Was the Annual Report made public?
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?
Yes (for exports)

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?
No

PARAGUAY

### Peru

#### Reporting practice summary - 2017

This is Peru’s first ATT Annual Report.

Peru defined the term ‘import’ as ‘Physical transfer of items across a national border’. It provided either Authorized or Actual Numbers, or both, for SALW imports. It also provided some Values of SALW imports.

Peru submitted a ‘nil’ report for exports.

#### Transfer summary - 2017: Import Data

- Peru reported imports from 11 countries in 2017. Of which, eight were ATT States Parties, two were Signatories and one was a non-member (Canada).
- Peru did not report imports of major conventional weapons in 2017.
- Peru reported the import of 11,535 SALW items in 2017. Of these items, 95 per cent were in the sub-category ‘Others’. Within the ‘Others’ subcategory, 76 per cent of imports were semi-automatic pistols.
- The main exporters to Peru were Austria (42 per cent), Brazil (16 per cent) and Czech Republic (11 per cent).

#### Transfer summary - 2017: Export Data


#### Good practices:

- Peru submitted its first ATT Annual Report.
- Peru provided clear, disaggregated data for all reported imports in 2017.
- Peru provided descriptions for most, but not all, SALW imports in 2017, as well as details of small arms imported listed under the category ‘Others’, mainly in the form of both Authorized and Actual Numbers of items with some values and descriptions included.

#### Room for improvement:

- Peru went back and forth in reporting Actual Numbers and Authorized numbers within the same sub-categories of SALW.

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| Was an Annual Report submitted by 31 May 2018? | Yes |
| Was the Annual Report made public? | Yes |
| Was a ‘nil’ report submitted for exports or imports in 2017? | Yes (for exports) |
| Was data withheld for ‘commercial sensitivity/national security-related’ reasons? | No |
POLAND

Reporting practice summary - 2017
Poland’s reporting practice in its Annual Report for 2017 was the same as that for 2016. However, it indicated that the cut-off date for transfers to be included in its 2017 Annual Report was 21 June 2018. In its 2016 report, the cut-off date provided was 10 August 2017.

Poland reported Actual Numbers of exports and imports for major conventional weapons and SALW.

Transfer summary - 2017: Export Data
- Poland reported exports to 19 countries in 2017. Of these, 12 were ATT States Parties, three were Signatories and four were non-members (Bhutan, Canada, Iraq and Jordan).
- Poland reported exports of 191 major conventional weapons items, spanning five categories. The majority were MANPAD missiles (42 per cent), missiles and missile launchers (35 per cent), and battle tanks (18 per cent).
- Poland reported the export of 9,266 SALW items in 2017, spanning eight sub-categories, including ‘Others’. Of these, 86 per cent were rifle and carbines, and 11 per cent were revolvers and self-loading pistols.
- The main importers of SALW from Poland were Iraq (43 per cent), Slovakia (24 per cent) and the United States (22 per cent).

Transfer summary - 2017: Import Data
- Poland reported imports from nine countries in 2017. Of these, eight were ATT States Parties and one was a Signatory.
- Poland reported one major conventional weapons export of 18 missiles and missile launchers from Norway.
- Poland reported 1,206 SALW items, spanning seven sub-categories, including ‘Others’.
- 40 per cent of reported imports of SALW items were revolvers and self-loading pistols and 20 per cent were sub-machine guns.
- The main exporters of SALW to Poland were Austria (34 per cent), Germany (30 per cent) and Czech Republic (21 per cent).

Good practices:
Poland provided clear, disaggregated data for all reported exports and imports in 2017.
Poland provided descriptions of items for all exports of major conventional weapons exports.

Room for improvement:
Poland did not specify if ‘commercially sensitive/national-security’ related data had been withheld from the report.
Poland did not provide descriptions for SALW that were exported or for major conventional weapons or SALW that were imported.

Was an Annual Report submitted by 31 May 2018?
- No – missed deadline

Was the Annual Report made public?
- Yes

Was a ‘nil’ report submitted for exports or imports in 2017?
- No

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?
- Unspecified, not ticked

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PORTUGAL

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Portugal provided clear, disaggregated data on all reported exports and imports in 2017.
Portugal reported descriptions of items for major conventional weapons exports and imports, as well as some imports of SALW.

Room for improvement:
Portugal only provided descriptions for items specified to be Actual transfers in 2017.

Transfer summary - 2017: Export Data
- Portugal reported exports to 30 countries in 2017. Of these, 25 were ATT States Parties, three were Signatories and two were non-members (Kuwait and Tajikistan).
- Portugal reported the export of 45 major conventional weapons items, including 42 armoured combat vehicles (32 to Guatemala and 10 to Tajikistan) and three manned combat aircraft to Honduras. The total value of major conventional weapons exports was €259m (US$291.9m).
- Portugal reported the export of 66,940 SALW items in 2017, covering three sub-categories. More than 99 per cent of SALW exports were rifles and carbines.
- The main importers of SALW items from Portugal were the United States (47 per cent) and Belgium (42 per cent).

Transfer summary - 2017: Import Data
- Portugal reported imports from 17 countries in 2017. Of these, 14 were ATT States Parties and two were Signatories.
- Portugal reported the import of 12 armoured combat vehicles, nine of which came from the United States and three from Kosovo. The total value of reported major weapon imports was €4.2m (US$4.4m).
- Portugal reported the import of 4,101 SALW items in 2017, spanning five sub-categories. 76 per cent of these items were rifles and carbines and 15 per cent were revolvers and self-loading pistols.
- The main importers of SALW items from Portugal were Italy (31 per cent), Belgium (18 per cent) and Germany (17 per cent).

Reporting practice summary - 2017
Portugal’s reporting practice in its Annual Report for 2017 was the same as that for 2016. It reported Actual exports and imports of major conventional weapons, and reported the Number of items and their Values. It reported either Authorized or Actual Numbers of SALW exports and imports. It also provided values for some SALW exports and imports.

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40 Portugal also reported imports from one non-UN member (Kosovo).
Romania

Reporting practice summary - 2017
Romania’s reporting practice in its Annual Report for 2017 was the same as that for 2016. It reported Actual Numbers of exports of SALW items and imports of major conventional weapons and SALW items. Its reporting practice in 2017 was identical to 2016, except that it did not report any exports of major weapons in 2017.

Transfer summary - 2017: Import Data
- Romania reported imports from 13 countries in 2017. Of these, 12 were ATT States Parties and one was a Signatory.
- The only major weapon import reported by Romania was for three manned combat aircraft from Portugal (with the United States listed as the state of origin).
- Romania reported the import of 2,497 SALW items in 2017, spanning five sub-categories. The majority were rifles and carbines (71 per cent), followed by revolvers and self-loading pistols (26 per cent). The main countries that Romania reported exporting SALW to were Iraq (49 per cent), the United States (35 per cent) and Germany (8 per cent).

Transfer summary - 2017: Export Data
- Romania reported exports to nine countries in 2017. Of these, five were ATT States Parties, one was a Signatory and three were non-members (Iraq, Saudi Arabia and Vietnam).
- Romania did not report any exports of major conventional weapons in 2017.
- Romania reported the export of 41,508 SALW items in 2017, spanning seven sub-categories. The majority were assault rifles (48 per cent), revolvers and self-loading pistols (23 per cent), and rifles and carbines (17 per cent).
- The main countries that Romania reported exporting SALW to were Iraq (49 per cent), the United States (35 per cent) and Germany (8 per cent).

Good practices:
- Romania provided clear, disaggregated data on all reported exports and imports in 2017.
- Romania provided descriptions of items in some cases and comments on transfers, including comments on the end-use and/or end-user.

Room for improvement:
- Romania aggregated states of origin for many reported SALW imports.

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No
SAINT LUCIA

SAINT VINCENT AND THE GRENADINES

SAMOA

SAN MARINO

TRACER ROUNDS FROM THE .50 CALIBRE HEAVY MACHINE GUN MOUNTED ON A JACKAL, DURING A NIGHT EXERCISE IN CUMBRIA, UK.
CREDIT: © CROWN 2016 / SGT. JAMIE PETERS
### Good practices:


### Room for improvement:

Senegal aggregated data on exporting states in its reporting of some SALW imports.

### Transfer summary - 2017: Export Data


### Transfer summary - 2017: Import Data

- Senegal reported imports from six countries in 2017.
- Of these, two were ATT States Parties, three were Signatories and one was a non-member (China).
- Senegal reported the import of 74 major conventional weapons items. Of these, 92 per cent were armoured combat vehicles and 8 per cent were large-calibre artillery systems.
- The main exporters of major conventional weapons items to Senegal were France (53 per cent), China (24 per cent) and Israel (15 per cent).
- Senegal reported the import of 2,322 SALW items in five sub-categories. Of these, 61 per cent were revolvers and self-loading pistols, 21 per cent assault rifles and 17 per cent rifles and carbines.
- Because Senegal aggregated some data on exporting states, it is impossible to determine the main SALW exporters to Senegal.

### Reporting practice summary - 2017

For 2017, Senegal submitted a ‘nil’ exports report. It reported **Actual Numbers** of imports of major conventional weapons and SALW.

Senegal kept its 2016 report confidential, but it has changed its definition of the term ‘import’ from its last publicly available Annual Report in 2015 from ‘Physical transfer of items across a national border’ to its own definition in 2017.

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<table>
<thead>
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<th>Answer</th>
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<tr>
<td>Was an Annual Report submitted by 31 May 2018?</td>
<td>Yes</td>
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<tr>
<td>Was the Annual Report made public?</td>
<td>Yes</td>
</tr>
<tr>
<td>Was a ‘nil’ report submitted for exports or imports in 2017?</td>
<td>Yes (for exports)</td>
</tr>
<tr>
<td>Was data withheld for ‘commercial sensitivity/national security-related’ reasons?</td>
<td>No</td>
</tr>
</tbody>
</table>
### Serbia

**Was an Annual Report submitted by 31 May 2018?**
Yes

**Was the Annual Report made public?**
Yes

**Was a ‘nil’ report submitted for exports or imports in 2017?**
Unspecified, not ticked

**Was data withheld for ‘commercial sensitivity/national security-related’ reasons?**
No

**Good practices:**
Serbia provided clear, disaggregated data for each reported export and import in 2017.

**Room for improvement:**
Serbia did not specify if it was providing a ‘nil’ report in its contents page, but as it provided data for exports and imports in 2017 it should have selected ‘no’ for both boxes.

Serbia did not provide descriptions of items for its exports and imports of major conventional weapons and SALW in 2017, after providing descriptions for most major conventional weapons exports and imports in 2016.

**Transfer summary - 2017: Export Data**
- Serbia reported exports to 35 countries and territories in 2017. Of those, 15 were ATT States Parties, five were Signatories and 14 were non-members (Afghanistan, Algeria, Azerbaijan, Canada, Democratic Republic of Congo, Egypt, Indonesia, Iraq, Kenya, Myanmar, Oman, Russia, Saudi Arabia and Vietnam).
- Serbia reported exports of 6,999 major conventional weapons items in 2017, spanning three categories. Of these, 57 per cent were for missiles and missile launchers and 42 per cent were for large-calibre artillery systems. The majority were to Saudi Arabia (59 per cent) and Iraq (28 per cent).
- Serbia reported the export of 77,352 SALW items in 2017, spanning 12 sub-categories, including ‘Others’ for both small arms and light weapons. The majority were either assault rifles (31 per cent), revolvers and self-loading pistols (28 per cent) or portable anti-tank missile launchers and rocket systems (19 per cent).
- The main importers of SALW from Serbia were the United States (39 per cent), Saudi Arabia (22 per cent) and United Arab Emirates (14 per cent).

**Transfer summary - 2017: Import Data**
- Serbia reported imports from 19 countries in 2017. Of those, 16 were ATT States Parties, two were Signatories and one was a non-member (Russia).
- Serbia reported imports of 158 major conventional weapons in 2017, covering three categories. Of these, 49 per cent were large-calibre artillery systems and 47 per cent were armoured combat vehicles. The main exporters of major conventional weapons to Serbia were Croatia and Hungary (32 per cent each), and Bosnia and Herzegovina (29 per cent).
- Serbia reported the import of 11,527 SALW items in 2017, spanning ten sub-categories, including ‘Others’. Of these, 61 per cent were for missiles and missile launchers and rocket systems, 15 per cent were revolvers and self-loading pistols and 12 per cent were rifles and carbines.
- The main exporters of SALW to Serbia in 2017 were Bulgaria (35 per cent of reported items), Montenegro (31 per cent) and Macedonia (17 per cent).

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42 Serbia also reported exports to one non-UN member (New Caledonia).
SEYCHELLES


SIERRA LEONE

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? Yes (for exports and imports)
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Sierra Leone indicated it submitted ‘nil’ reports for both exports and imports by ticking the relevant boxes.

Room for improvement:
Sierra Leone did not tick the ‘no’ boxes to indicate it was not submitting annual reports of exports and imports.

Reporting practice summary - 2017
Sierra Leone submitted ‘nil’ reports for both exports and imports in 2017.

Transfer summary - 2017: Export Data
• Sierra Leone submitted a ‘nil’ report for exports in 2017.

Transfer summary - 2017: Import Data
• Sierra Leone submitted a ‘nil’ report for imports in 2017.
SLOVAKIA

Reporting practice summary - 2017
Slovakia’s reporting practice in 2017 was identical to 2016. It reported Actual Numbers of exports and imports of major conventional weapons and SALW.

Transfer summary - 2017: Import Data
- Slovakia reported imports from 19 countries in 2017. Of those, 14 were ATT States Parties, three were Signatories and two were non-members (Belarus and Canada).
- Slovakia reported the import of 65 major conventional weapons in 2017, spanning five categories. The majority were armoured combat vehicles (71 per cent) or large-calibre artillery systems (29 per cent).
- The main exporter of major conventional weapons to Slovakia was Czech Republic (69 per cent of items).
- Slovakia reported the import of 44,181 SALW items in 2017, covering ten sub-categories, including ‘Others’. The majority were revolvers and self-loading pistols (69 per cent), sub-machine guns (20 per cent), and rifles and carbines (11 per cent).
- The main exporters of SALW to Slovakia were Czech Republic (36 per cent) and Austria and Italy (29 per cent each).

Transfer summary - 2017: Export Data
- Slovakia reported exports to 50 countries and territories in 2017. Of those, 32 were ATT States Parties, nine were Signatories and seven were non-members (Canada, Egypt, Kenya, Kyrgyzstan, Pakistan, Sri Lanka and Vietnam).
- Slovakia reported the export of 4,298 major conventional weapons, spanning three categories. Of these, 97 per cent of reported items were missiles and missile launchers, 96 per cent of exports of major conventional weapons were to Serbia.
- Slovakia reported the export of 93,083 items of SALW in 2017, covering seven sub-categories, including ‘Others’. The vast majority were revolvers and self-loading pistols (78 per cent) or sub-machine guns (20 per cent).
- The majority of exports of SALW from Slovakia were to Thailand (55 per cent), Bulgaria (16 per cent) and Mexico (7 per cent).

Good practices:
- Slovakia provided clear, disaggregated data for each reported export and import in 2017.
- Slovakia provided detailed descriptions of major conventional weapons items for each export and import of major weapons in 2017.

Room for improvement:
- Slovakia did not specify the cut-off date for transfers to be included in its 2017 Annual Report.
- Slovakia did not provide descriptions of SALW items imported or exported in 2017, except for a few entries within the ‘Others’ sub-category that specified what the items were. It did not provide any comments on its transfers.

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

43 Slovakia also reported exports to two non-UN members (Hong Kong and Taiwan).
SLOVENIA

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
Slovenia provided clear, disaggregated data for each reported import and export in 2017 including both numbers and values of items transferred. Slovenia provided descriptions of almost all items reported in 2017.

Room for improvement:
Slovenia only provided comments on a minority of its transfers.

Transfer summary - 2017: Export Data
• Slovenia reported exports to 14 countries and territories in 2017. Of those, ten were ATT States Parties, two were Signatories and one was a non-member (Egypt). 44
• For major conventional weapons, Slovenia reported exports of 93 large-calibre artillery systems worth €607,056 (US$684,086) 45 to Bulgaria and five MANPADS missiles to Turkey. It specified in the comment section that the MANPADS exported to Turkey were for ‘testing purposes’.
• Slovenia reported the export of 13,605 SALW items in 2017, worth €3.4m (US$3.8m) 46 spanning eight sub-categories. The majority, in terms of numbers of items, were revolvers and self-loading pistols (57 per cent) and rifles and carbines (31 per cent).
• The vast majority of SALW items were exported to Austria (53 per cent) or the United States (44 per cent).

Transfer summary - 2017: Import Data
• Slovenia reported imports from four countries in 2017. All reported imports were SALW items from ATT States Parties.
• In total, Slovenia reported imports of 371 items, worth €388,504 (US$466,127) 47 and spanning four sub-categories.
• The majority, in terms of numbers of SALW imported items, were assault rifles (82 per cent).
• Germany was the main exporter of SALW, in terms of number of items, to Slovenia in 2017, responsible for 96 per cent of items.

Slovenia’s reporting practice in 2017 was identical to that in 2016. It reported Actual Numbers and Values for its exports and imports of major conventional weapons and SALW, as well as imports of SALW. It did not report the import of any major conventional weapons.

44 Slovenia also reported exports to one non-UN member (Kosovo).
45 Slovenia did not specify which currency it used for reported values of transfers. For this analysis, the ATT Monitor has assumed the currency to be euros. Currency conversion via OECD Data, reflecting 2017 annual conversion rate. https://data.oecd.org/conversion/exchange-rates.htm.
46 Ibid.
47 Ibid.
**SOUTH AFRICA**

**Good practices:**
South Africa provided clear, disaggregated data for each reported export of major conventional weapons and some exports and imports of light weapons in 2017.

**Room for improvement:**
South Africa withheld some data from its Annual Report for 'commercial sensitivity/national security-related' reasons, but did not specify where or how much information was withheld.

South Africa provided significantly less information in descriptions, comments and end-user information for major conventional weapons in 2017 than in 2016.

South Africa provided data on exports and imports in the 'Others' categories of small arms but did not provide descriptions of those items.

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**Transfer summary - 2017: Export Data**

- South Africa reported exports to 34 countries in 2017. Of these, 12 were ATT States Parties, 10 were Signatories and 12 were non-members (Algeria, Azerbaijan, Belarus, Botswana, Canada, Egypt, India, Indonesia, Jordan, Oman, Russia and Saudi Arabia).

- South Africa reported exports of 105 major conventional weapons items, 57 per cent of which were armoured combat vehicles and 43 per cent were missiles and missile launchers.

- The main importers of South Africa's major conventional weapons exports were Algeria (43 per cent), Singapore (26 per cent) and Angola (20 per cent).

- South Africa reported the export of 2,730 SALW items, spanning five sub-categories. Of these, 50 per cent were small arms listed under the generic category ‘Others’ and 31 per cent were aggregated light weapons exports. Some exports of heavy machine guns, hand-held under-barrel and mounted grenade launchers and mortars of calibres less than 75mm were disaggregated.

- The main importers of SALW exports from South Africa were Oman and Japan (18 per cent each).

---

**Transfer summary - 2017: Import Data**

- South Africa reported imports from 24 countries in 2017. Of these, 18 were ATT States Parties, four were Signatories and two were non-members (Canada and Russia).

- South Africa did not report any imports of major conventional weapons in 2017.

- South Africa reported the import of 34,580 SALW items. More than 99 per cent of these items were reported as small arms listed under the generic category ‘Others’, with data disaggregated by exporting state.

- The main importers of SALW exports from South Africa were the United States (31 per cent), Czech Republic (24 per cent) and Japan (20 per cent).
Spain's reporting practice remained unchanged for 2017. It reported actual numbers of exports of major conventional weapons items and light weapons, as well as imports of small arms. It did not report any imports of major conventional weapons.

Transfer summary - 2017: Export Data

- Spain reported exports to seven countries in 2017. Of these, four were ATT State Parties and three were non-members (Indonesia, Oman and Pakistan).
- Spain reported the export of 110 major conventional weapons items, all of which were large-calibre artillery systems. Of these, 90 per cent were exported to Italy.
- Spain reported the export of 2,426 SALW items, all of which were portable anti-tank missile launchers and rocket systems. Of these, 58 per cent went to Pakistan, 21 per cent to Estonia, 13 per cent to Indonesia and 8 per cent to Oman.

Transfer summary - 2017: Import Data

- Spain reported one import from one ATT Signatory, four assault rifles from the United States.

Good practices:

Spain provided clear, disaggregated data for all reported exports and imports in 2017.

Spain indicated that it did not withhold commercially sensitive/national-security related data in 2017, after not giving such an indication in its 2016 report.

Room for improvement:

Spain did not indicate by ticking the relevant boxes if it was including ‘nil’ reports for its imports or exports, though it provided data for both.

Spain provided no descriptions of items or comments on transfers.
SWEDEN

Was an Annual Report submitted by 31 May 2018?  Yes
Was the Annual Report made public?  Yes
Was a ‘nil’ report submitted for exports or imports in 2017?  No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  Yes

Good practices:
Sweden made extensive use of ‘Section C: Voluntary National Categories’ to report data under the EU Common Military List categories (with exports included under 18 of those 22 categories). It reported aggregate Actual Values of items exported to individual destinations under each category. 48 Sweden provided descriptions of items for all exports reported in Sections A and B (under ATT major conventional weapons and SALW categories), and for its sole reported import.

Room for improvement:
The report does not clarify the relationship between items reported under Sections A and B and items reported under Section C (voluntary national categories). 49 There are also exports noted under ML6 in Section C to 11 other countries, which are not referred to in Section A. 50 Sweden did not provide any comments on transfers in 2017.

Transfer summary - 2017: Export Data
- Under Sections A and B, Sweden reported exports of arms to 6 countries in 2017. Of these, 4 were ATT States Parties, one was a Signatory and one was a non-member (India).
- For major conventional weapons, in Section A Sweden reported exports to two countries, spanning two categories. It reported an export of 10 armoured combat vehicles to Norway, but marked the quantity of the export of MANPADS missiles to Brazil as ‘classified’.
- Sweden reported light weapon exports to four countries but kept the amounts of each classified.
- Under Section C (voluntary national categories), Sweden also provided data covering 18 categories of the EU Common Military List. Under ML1 items, which include small arms, it reported exports worth SEK10.6m (US$1.2m). 51 The majority of ML1 exports by value were to South Africa (21 per cent), Belgium (19 per cent) and United Kingdom (16 per cent).

Transfer summary - 2017: Import Data
- Sweden reported only one import in 2017 from one ATT State Party, an unspecified number of missiles and missile launchers from United Kingdom.

48 Of the items reported by Sweden under voluntary national categories, only ML1 items (smooth-bore weapons with a calibre of less than 20mm, other arms and automatic weapons with a calibre of 12.7mm (calibre 0.50 inches) or less) are considered for analysis here, as Sweden indicated in its report that these items corresponded to Small Arms (aggregated).
49 For example, in Section C under ML6 (ground vehicles) there is reference to export to Norway valued at SEK 486,623,123 (US$58.8m). This may or may not refer to the 10 armoured combat vehicles identified as exported to Norway in Section A.
50 There may be ATT-compliant reasons for this. For example, the other exports under ML6 may be for vehicles of a type that does not strictly fit within Article 2.1 (b) of the Treaty (‘armoured combat vehicles’). An explanation to clarify this relationship would be helpful.
SWITZERLAND

Reporting practice summary - 2017
Switzerland's reporting practice remained mostly the same for 2017 as for 2016. It reported Actual Numbers of major conventional weapons exports during 2017 but, unlike the previous year, it did not report any imports of major conventional weapons.

Switzerland reported Authorized Numbers of SALW exports and import.
Switzerland reported exports and imports using the ATT reporting template, but provided information in Annex 2 to clarify that it reported exports and imports under UN Registry Categories I-VIII, including a detailed description of its Category VIII definition.

Transfer summary - 2017: Import Data
• Switzerland reported imports from 25 countries in 2017. Of those, 20 were ATT States Parties, three were Signatories and two were non-members (Canada and China).
• Switzerland did not report any imports of major conventional weapons.
• Switzerland reported the import of 22,932 SALW items in 2017, covering five sub-categories.
• Of these, 76 per cent of SALW imports were revolvers and self-loading pistols, 14 per cent were assault rifles and 7 per cent were rifles and carbines.
• The majority of Switzerland's reported SALW imports were from Germany (30 per cent), Austria (23 per cent) and the United States (22 per cent).

Transfer summary - 2017: Export Data
• Switzerland reported exports to 43 countries in 2017. Of those, 32 were ATT States Parties, five were Signatories and six were non-members (Canada, China, India, Kuwait, Oman and Qatar).
• Switzerland reported exports of six major conventional weapons items in 2017, of which 83 per cent were armoured combat vehicles and the remainder was large-calibre artillery systems. 67 per cent of the total number of major conventional weapons were exported to Germany.
• In total, Switzerland reported exports of 9,510 SALW items, spanning six sub-categories.
• The majority of SALW items exported by Switzerland were rifles and carbines (34 per cent), revolvers and self-loading pistols (31 per cent) and assault rifles (18 per cent).
• The majority of Switzerland's reported SALW exports were to the United States (43 per cent), France and Canada (9 per cent each).

Good practices:
Switzerland provided clear, disaggregated data on each reported export and import in 2017.
Switzerland provided descriptions and comments on exports of major conventional weapons.

Room for improvement:
Switzerland did not provide descriptions or comments on the majority of its reported transfers for 2017, which were comprised mainly of SALW.

Transfer summary - 2017: Import Data
• Switzerland reported imports from 25 countries in 2017. Of those, 20 were ATT States Parties, three were Signatories and two were non-members (Canada and China).
• Switzerland did not report any imports of major conventional weapons.
• Switzerland reported the import of 22,932 SALW items in 2017, covering five sub-categories.
• Of these, 76 per cent of SALW imports were revolvers and self-loading pistols, 14 per cent were assault rifles and 7 per cent were rifles and carbines.
• The majority of Switzerland’s reported SALW imports were from Germany (30 per cent), Austria (23 per cent) and the United States (22 per cent).

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• In total, Switzerland reported exports of 9,510 SALW items, spanning six sub-categories.
• The majority of SALW items exported by Switzerland were rifles and carbines (34 per cent), revolvers and self-loading pistols (31 per cent) and assault rifles (18 per cent).
• The majority of Switzerland’s reported SALW exports were to the United States (43 per cent), France and Canada (9 per cent each).
FYR MACEDONIA

Was an Annual Report submitted by 31 May 2018?  Yes
Was the Annual Report made public?  Yes
Was a 'nil' report submitted for exports or imports in 2017?  No (unspecified for exports)
Was data withheld for 'commercial sensitivity/national security-related' reasons?  No

Good practices:
Macedonia reported clear, disaggregated data for each reported export and import. It also provided a description of the light weapons it exported and states of origin for its small arms imports.

Room for improvement:
Macedonia did not indicate if it submitted a 'nil' export report by ticking 'No' to 'Nil report on exports of conventional arms', but reported light weapons export data.
Macedonia did not provide descriptions for its small arms imports.

Transfer summary - 2017: Export Data
- Macedonia did not report exports of major conventional weapons.
- Macedonia reported one export of SALW to one ATT State Party, which was 2,005 portable anti-tank missile launchers and rocket systems worth US$753,880 to Serbia.

Transfer summary - 2017: Import Data
- Macedonia reported the import of small arms from 12 countries in 2017.
- Of these, 10 were ATT States Parties and two were Signatories.
- Macedonia did not report the import of major conventional weapons.
- Macedonia reported imports of a total of 884 SALW items in 2017. 76 per cent of these were rifles and carbines, and 24 per cent were revolvers and self-loading pistols.

REPORTING PRACTICE SUMMARY - 2017
Macedonia’s 2017 reporting practice changed from the previous year. In 2017 it reported Authorized Numbers and Values of items in only one light weapons export sub-category, along with Authorized and Actual Numbers of SALW imports. It did not report exports or imports of major conventional weapons. In 2016, Macedonia provided a 'nil' report on exports.

TOGO

TRINIDAD AND TOBAGO
**TUVALU**

Was an Annual Report submitted by 31 May 2018?  
No

Was the Annual Report made public?  
Yes

Was a ‘nil’ report submitted for exports or imports in 2017?  
No (indicated ‘yes’ in Annexes 3A and 3B)

Was data withheld for ‘commercial sensitivity/national security-related’ reasons?  
Unspecified – not ticked

**Good practices:**
Tuvalu submitted its first ATT Annual Report.

**Room for improvement:**
Tuvalu did not tick many of the relevant boxes. It did not indicate if it was submitting annual reports of exports or imports, and it did not indicate if it withheld commercially sensitive and/or national security-related data.

Tuvalu did not indicate the calendar year for which it was reporting or provide a cut-off date for transfers reported in its 2017 Annual Report.

Tuvalu did not provide definitions of the terms ‘export’ or ‘import.’

**Transfer summary - 2017: Export Data**

- Tuvalu did not report any exports of major conventional weapons or SALW.

**Transfer summary - 2017: Import Data**

- Tuvalu did not report any imports of major conventional weapons or SALW.

**Reporting practice summary - 2017**

This is Tuvalu’s first ATT Annual Report.

Tuvalu indicated it did not submit ‘nil’ reports for either exports or imports on the front page of the ATT reporting template. However, it completed Annex 3A and 3B to indicate it did submit ‘nil’ reports for both exports and imports. It did not report any exports or imports of major conventional weapons or SALW.
UNITED KINGDOM

Was an Annual Report submitted by 31 May 2018? Yes
Was the Annual Report made public? Yes
Was a ‘nil’ report submitted for exports or imports in 2017? No
Was data withheld for ‘commercial sensitivity/national security-related’ reasons? No

Good practices:
United Kingdom provided clear, disaggregated data for each export of major conventional weapons and SALW in 2017.
United Kingdom provided descriptions of items and some comments on transfers for many, but not all, of its exports. Descriptions and comments were largely provided in connection with Authorized exports of major conventional weapons.

Room for improvement:
United Kingdom indicated that it was not providing a ‘nil’ report for imports, yet it provided no data on imports for major conventional weapons or SALW in 2017.
United Kingdom did not provide comments on all reported transfers and did not comment on the end-use and/or end-user for all transfers.

Transfer summary - 2017: Export Data
- United Kingdom reported Authorized exports to 71 countries for 2017. Of these, 41 were ATT States Parties, 12 were Signatories and 18 were non-members (Afghanistan, Azerbaijan, Botswana, Canada, Ecuador, Egypt, India, Indonesia, Jordan, Kenya, Kuwait, Morocco, Oman, Pakistan, Qatar, Russia, Saudi Arabia and Somalia).
- United Kingdom reported authorizing the export of 965 major conventional weapons items in 2017, spanning seven categories. Of these, 58 per cent were missiles and missile launchers, 18 per cent were MANPADS missiles and 16 per cent were armoured combat vehicles.
- The majority of major conventional weapons were exports to India (40 per cent), Saudi Arabia (19 per cent) and Indonesia (13 per cent).
- United Kingdom reported exports of 36,066 SALW items in 2017, spanning ten sub-categories, including ‘Others’. Of these, 80 per cent were rifles and carbines and 10 per cent were assault rifles.
- The main reported destinations for SALW items exports from United Kingdom were the United States (63 per cent) and Kenya (8 per cent).

Transfer summary - 2017: Import Data
- The United Kingdom did not report imports in 2017.

Reporting practice summary - 2017
United Kingdom’s reporting practice for its 2017 ATT Annual Report matched that for its 2016 ATT Annual Report. It ticked the ‘Other’ box for its definition of the term ‘export’, elaborating that ‘UK data is based on licenses granted, not actual transfers’. It did not define the term ‘import’.
United Kingdom reported Authorized Numbers of exports of major conventional weapons and SALW in 2017.
United Kingdom did not report imports in 2017.

URUGUAY

Did not submit an ATT Annual Report for 2017 (but submitted for 2016).

ZAMBIA

BOXES OF 5.56MM CALIBRE AMMUNITION IN THE UK.

CREDIT: © CROWN 2014 / SGT. BRIAN GAMBLE
2.3 - DISCREPANCY ANALYSIS

Accurate, comprehensive and timely reporting is an essential tool for transparency and one States Parties can use to demonstrate that their arms trade policies and systems are consistent with their Arms Trade Treaty (ATT) obligations. Such reporting enhances awareness of regional and global trends in arms transfers and facilitates assessments of States Parties’ compliance with the Treaty in regards to export and import decisions. During the two meetings of the Working Group on Transparency and Reporting (WGTR) held before the Fifth Conference of States Parties (CSP 2019), ATT stakeholders reinforced the importance of submitting timely Annual Reports. In addition, discussion at these meetings emphasized that it is not just quantity of reports, but also the quality of information in them, that is important.

This chapter takes an in-depth look at exports and imports submitted by States Parties in their 2017 Annual Reports:

- First, it provides an overall analysis on the extent to which reported exports and imports are comparable within these reports (for example, if one State Party reports an export of assault rifles to another, does the second State Party also report the import?).
- Second, it provides examples of reporting practices and different sources of information provided by States Parties within reporting templates that make it difficult to compare data from one report with another.
- Third, it provides recommendations drawn from Stimson’s ATT Baseline Assessment Project (ATT-BAP) on steps that can be taken by States Parties to provide comprehensive, accurate and comparable information in Annual Reports that allow a bigger picture of the global arms trade to emerge. For more than five years, ATT-BAP has conducted research and analysis on ATT reporting practices to gain insight into national processes for compiling and submitting ATT Initial and Annual Reports, reporting challenges, and good practices. Its findings and recommendations are a culmination of this analysis of national experiences of States Parties in complying with ATT reporting obligations, and its recent report on ‘Lessons Learned in ATT Reporting’ provides a comprehensive overview of good practice.

METHODOLOGY

The analysis in this chapter looked first at the 50 Annual Reports for 2017 transfers submitted and made publicly available by States Parties by 1 February 2019. Data from these reports were only considered when they included information on quantities exported that were disaggregated by weapon-type categories and by destination country (for example, Germany exported 52 sub-machine guns to the Netherlands).

Export reports, rather than import reports, that fit the above criteria formed the starting point of analysis. All export transactions were compared to import transactions where an ATT State Party reported exports to another ATT State Party that also submitted a publicly available 2017 Annual Report.

Where a reported export corresponds exactly with a reported import involving the same type of weapon, country and quantity of items, the ATT Monitor categorizes this type of transaction to be an ‘exact mirror’ (for example, Montenegro reported the export of 995 ‘Portable anti-tank missile launchers and rocket systems’ to Serbia, which in turn reported the import of 995 ‘Portable anti-tank missile launchers and rocket systems’ from Montenegro). A transaction that involves the same type of weapon and country but a different quantity is categorized as a ‘partial mirror’ (for example, Sweden reported the export of 10 ‘Armoured combat vehicles’ to Norway, which in turn reported the import of 17 ‘Armoured combat vehicles’ from Sweden).

The analysis includes data from small arms and light weapons (SALW) and major conventional weapons transactions. Though all three weapons categories were included in the analysis, most examples provided below are of SALW due to the lack of comparable data for major conventional weapons presented in 2017 Annual Reports. However, the likely reasons for discrepancies in reported exports and imports below apply also to major conventional weapons.

It is not expected that all reported exports and imports can be compared. By identifying differences in reporting practices and information provided by States Parties within reporting templates, this chapter seeks to highlight reasons for data discrepancies and provide concrete recommendations for States Parties to provide data that is more accurate, clear and comprehensive.

DISCREPANCY ANALYSIS OVERALL FINDINGS

The analysis in this chapter shows an overall lack of clarity in reporting. It finds that 92 per cent of transactions reported in 2017 Annual Reports were not comparable, as in an export did not have a corresponding import of a similar type of weapon (or vice versa). As a central objective of the ATT is to provide greater transparency of the global arms trade and a more comprehensive understanding of global arms transfers, it is notable that a picture of the arms trade does not emerge from Annual Reports submitted by States Parties.

By seeking to explain the discrepancies in reporting, it is also clear that certain reporting practices – such as aggregating information, withholding data for ‘commercial sensitivity’/national security-related reasons without specifying where or how much, and not reporting imports – makes it difficult or impossible to determine if an ATT State Party is abiding by its Treaty obligations.

Reporting practices vary widely, as do national control systems and record-keeping mechanisms. Likely reasons for the discrepancies in reported exports and imports identified in this chapter also arise from this mismatch of practice and the different types of information reported by States Parties within reporting templates. Among reasons detailed below, this information may include different definitions of key terminology used to report transfers, different information-collection processes, confusion regarding reporting requirements, and/or limited capacity and resources.4

COMPARABLE TRANSACTIONS

There were a total of 3,070 separate transactions of conventional weapons reported by States Parties in 2017 Annual Reports, out of which 2,022 were exports and 1,048 imports. Of the 2,022 reported exports, only 150 transactions, or 7.4 per cent, could be compared with information reported by importing States Parties. Each comparable transaction was considered to be either an ‘exact mirror’ or a ‘partial mirror’, as defined above. This marks a 1.6 per cent decrease in comparable information from 2016 Annual Reports.5

Of the 150 reported exports that could be compared, 32 were exact mirrors and 118 partial mirrors. This means that only 1.6 per cent6 of the total reported exports corresponded exactly with the corresponding reported imports, while 6 per cent corresponded partially.

The 118 transactions that were partially mirrored had some considerable differences in terms of quantities reported, though the weapon type and countries were the same. For example, Albania reported the export of 31 heavy machine guns to Bulgaria, which reported the import of 27 heavy machine guns. Analysis of partially mirrored transactions shows that:

- In 12 transactions the discrepancy in quantity was 10 per cent or less
- In 27 transactions the discrepancy in quantity was between 10 and 50 per cent
- In 79 transactions the discrepancy in quantity was over 50 per cent

The analysis also found several transactions that were partially mirrored where the number of reported items differed significantly. These include the following.

- Czech Republic reported the export of 81 ‘Sub-machine guns’ to Slovakia, which reported the import of 11,642 ‘Sub-machine guns’.
- Czech Republic reported the export of 13,665 ‘Assault rifles’ to Slovakia, which reported the import of 60 ‘Assault rifles’.
- Finland reported the export of 1 ‘Rifle and carbine’ to Bulgaria, which reported the import of 482 ‘Rifles and carbines’.
- Germany reported the export of 609 ‘Assault rifles’ to Lithuania, which reported the import of 6,715 ‘Rifles and carbines’.7
- Slovakia reported the export of 6,310 ‘Revolvers and self-loading pistols’ to Mexico, which reported the import of 159 ‘Revolvers and self-loading pistols’.8

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6 The percentage of exact mirrors identified in this year’s report is the same as last year’s. See ibid., p.46.
7 Lithuania reported this in two separate entries describing them as ’G36’ and ‘HK416’, both of which are assault rifles.
8 Mexico reported this in three separate entries to describe the different calibres.
TRANSACTIONS THAT COULD NOT BE COMPARED

For the remaining 92 per cent of reported transactions, an export did not have a corresponding import of a similar type of weapon (or vice versa).

Table 2.1 below provides examples of a small subset of the reported exports that could not be compared. These exports were reported by States Parties, but no corresponding import could be found in data reported by States Parties in import reports.

Table 2.1 Selected transfers not reported by importing States Parties

<table>
<thead>
<tr>
<th>Exporter</th>
<th>Importer</th>
<th>Type</th>
<th>Number of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech Republic</td>
<td>Poland</td>
<td>Rifles and carbines</td>
<td>454</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>Poland</td>
<td>Sub-machine guns</td>
<td>144</td>
</tr>
<tr>
<td>Czech Republic</td>
<td>Nigeria</td>
<td>Assault rifles</td>
<td>3,000</td>
</tr>
<tr>
<td>Germany</td>
<td>Spain</td>
<td>Assault rifles</td>
<td>610</td>
</tr>
<tr>
<td>Portugal</td>
<td>Spain</td>
<td>Rifles and carbines</td>
<td>2,580</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Sub-machine guns</td>
<td>1,400</td>
</tr>
<tr>
<td>Slovakia</td>
<td>Serbia</td>
<td>Missiles &amp; missile launchers</td>
<td>3,030</td>
</tr>
<tr>
<td>Slovakia</td>
<td>Bulgaria</td>
<td>Sub-machine guns</td>
<td>15,000</td>
</tr>
<tr>
<td>United Kingdom</td>
<td>Belgium</td>
<td>Armoured combat vehicles</td>
<td>108</td>
</tr>
</tbody>
</table>
There are many reasons, identified below, for the lack of comparability of the majority of data reported by States Parties in 2017 Annual Reports.

EXPLAINING THE DISCREPANCIES – REPORTING PRACTICES

DIFFERING LEVELS OF AGGREGATION OF INFORMATION

It is difficult or impossible to comparatively analyze transfer data from States Parties that include aggregated data in their Annual Reports. To provide information that is clearly disaggregated, a State Party must:

- Report on Authorized or Actual (or both) exports and imports
- Specify weapon type
- Provide a number or value (or both) for each item
- Clearly name the final exporting and/or importing country

Some States Parties reported aggregated information that made it impossible to determine these types of information about exports and imports. For example, many States Parties aggregated transfers by country and/or by weapon types. Belgium and Sweden aggregated information by the categories defined by the EU Common Military List. The information aggregated by Belgium concerns only SALW, while Sweden provided information on nearly all the 22 EU Common Military List categories, which includes but is not limited to the conventional arms covered by ATT Articles 2-4.

Any form of aggregated data makes it difficult or impossible to compare information. Notable examples include the following:

- States Parties reported authorized and actual exports of 54,720 items to Belgium. Portugal reported the authorized export of 28,246 'Rifles and carbines' to Belgium while Japan reported the actual export of 24,713 units of SALW comprising of 'Other sporting, hunting or target-shooting shotguns, including combination shotgun-rifles' and 'Other sporting, hunting or target-shooting rifles' to Belgium. However, Belgium aggregated information by EU Common Military weapon type and by country, and did not provide quantities with the exception of two imports.

- Austria provided clear and disaggregated data for major conventional weapons exports. However, it reported authorized and actual exports of 3,100,256 units of SALW, aggregating information by the broader SALW categories.

- Australia reported authorized exports of 5,889 items covering major conventional weapons and SALW. While several exports of major conventional weapons are disaggregated, all SALW transfers (5,871 items) reported are aggregated by weapon type. Australia also aggregated imports, reporting 102,613 items of SALW while stating 'Various' in the exporting-country column. It did not indicate if its small arms imports were authorized or actual imports.

- Austria reported authorized exports of 62,348 items of SALW to Norway but did not specify the types of weapons that were transferred. Norway, however, reported a very small number of actual imports that did not include Austria among the exporters.

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Bosnia and Herzegovina mostly provided information aggregated by weapon type and provided quantities of items that would be considerably smaller if the information were disaggregated to specify items exported to/imported from each country. Table 2.2 and Table 2.3 show examples of how Bosnia and Herzegovina reported information.

Table 2.2 Example of exports reported by Bosnia and Herzegovina

<table>
<thead>
<tr>
<th>Exporter</th>
<th>Importer</th>
<th>Type</th>
<th>Number of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bosnia and Herzegovina</td>
<td>Serbia, United Arab Emirates</td>
<td>Revolvers and self-loading pistols</td>
<td>6</td>
</tr>
<tr>
<td>Bosnia and Herzegovina</td>
<td>Egypt, Namibia, United Arab Emirates</td>
<td>Assault rifles</td>
<td>15</td>
</tr>
</tbody>
</table>

Table 2.3 Examples of imports reported by Bosnia and Herzegovina

<table>
<thead>
<tr>
<th>Exporter</th>
<th>Importer</th>
<th>Type</th>
<th>Number of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Austria, Brazil, Croatia, Czech Republic, Germany, Greece, Italy, Serbia, Slovakia, Slovenia, Turkey, United States</td>
<td>Bosnia and Herzegovina</td>
<td>Revolvers and self-loading pistols</td>
<td>2,755</td>
</tr>
<tr>
<td>Belgium, Brazil, Serbia, Croatia</td>
<td>Bosnia and Herzegovina</td>
<td>Assault rifles</td>
<td>188</td>
</tr>
</tbody>
</table>

Aggregation of transfer data is also concerning as it makes it difficult or impossible to determine if an ATT State Party is fulfilling its Treaty obligations (particularly Articles 6, 7 and 11). For example, when information is not provided on exporting and importing states, it is difficult or impossible to determine whether “an ATT State Party has not exported conventional arms to a recipient that poses a significant risk of misuse of the transferred weapons.”

Recommendations:

- States Parties should provide clear, comprehensive information in Annual Reports.
- States Parties should utilize existing software and databases to develop national record-keeping and reporting processes that allow for the reporting of disaggregated data.
- States Parties should develop national tools for data management and storage to facilitate information collection for ATT reports.

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10 ATT-BAP (2017). ‘Reviewing 2017 ATT Annual Reports on Arms Exports and Imports: Fulfilling the Promise of the ATT?’

11 ATT-BAP (2019). ‘Lessons Learned from ATT Reporting.’

12 Ibid.
AUTHORIZATIONS AND ACTUAL DELIVERIES

The reporting regime of the ATT allows States Parties to report either transfer authorizations (permissions granted by a government to export or import) or actual deliveries (movements of arms across borders), or both.

In 2017 Annual Reports, States Parties reported authorized and actual transfers as follows:13

- Seven States Parties reported authorized exports of major conventional weapons, and 22 reported actual deliveries.
- Twelve States Parties reported authorized exports of SALW, 25 reported actual deliveries, and two reported both.
- Six States Parties reported authorized imports of major conventional weapons, and 19 reported actual deliveries.
- Eleven States Parties reported authorized imports of SALW, 26 reported actual deliveries, and four reported both.

These differences contribute to discrepancies in information as a result of:

- Transfers authorized to be delivered over a number of years.
- Quantity of transfers authorized being subject to revision or cancelation.
- Shipment of arms taking place in a different year than that in which they were authorized.
- Exporters obtaining licenses for more weapons than what was originally ordered by buyers (in case buyers decide to increase order quantity at a later date).

The examples below show differences in quantities of items of reported exports and imports (of the same weapon type), in addition to differences in reporting practices in regard to transfer authorizations and actual deliveries:

- Czech Republic reported the actual export of two ‘Assault rifles’ to Switzerland, which reported the authorized import of 154 units of the same weapon type.
- Czech Republic reported the actual export of eight ‘Sub-machine guns’ to Switzerland, which reported the authorized import of 133 units of the same weapon type.
- Finland reported the actual export of four ‘Rifles and carbines’ to New Zealand, which reported the authorized import of 2,148 units of the same weapon type.
- Germany reported the authorized export of 5,660 ‘Sub-machine guns’ to France, which reported the actual import of only three units of the same weapon type.
- Germany also reported the authorized export of 8,436 ‘Assault rifles’ to France, which reported the actual import of 5,901 of the same weapon type.14

Recommendations:

- States Parties should provide both actual and authorized transfer data and number and value. However, if they can only provide one data point, actual transfers is a preferable metric to authorized transfers and the number of items transferred is preferable to the value of the transfer.15

‘NIL’ REPORTS

In 2017 Annual Reports, a total of eight States Parties16 indicated they were submitting a ‘nil’ report on exports, while four17 indicated they were submitting a ‘nil’ imports report by ticking the relevant boxes within the reporting template or completing Annex 3A or 3B (thereby declaring that the State Party did not transfer anything). Three States Parties indicated they were submitting ‘nil’ reports for both exports and imports.18 Two States Parties19 only reported exports, did not submit information on imports and did not indicate they were submitting a ‘nil’ report for imports.

There are instances, however, where States Parties ticked the ‘nil’ report boxes but subsequently provided information on transfers. Bosnia and Herzegovina indicated its submission of ‘nil’ reports for both exports and imports on the cover page of the reporting template as well as in Annex 3A and Annex 3B, but reported information on exports as well as imports of SALW. Other States Parties also provided information on imports from and exports to Bosnia and Herzegovina. Some examples are given in Table 2.4 and Table 2.5.

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14 France reported actual imports of assault rifles from Germany in two separate entries of 433 and 5,468 units, describing both as ‘Fusils d’Assaut’.
15 ATT-BAP draft report, forthcoming.
16 Bosnia and Herzegovina, Dominican Republic, El Salvador, Panama, Peru, Senegal, Sierra Leone and Tuvalu.
17 Bosnia and Herzegovina, Luxembourg, Sierra Leone and Tuvalu.
18 Bosnia and Herzegovina, Sierra Leone and Tuvalu.
19 Austria and United Kingdom.
Table 2.4 States Parties that reported imports from Bosnia and Herzegovina

<table>
<thead>
<tr>
<th>Exporter</th>
<th>Importer</th>
<th>Type</th>
<th>Number of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bulgaria</td>
<td>Bosnia and Herzegovina</td>
<td>Mortars of calibres less than 75mm</td>
<td>5</td>
</tr>
<tr>
<td>Hungary</td>
<td>Bosnia and Herzegovina</td>
<td>Large-calibre artillery systems</td>
<td>200</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Mortars of calibres less than 75mm</td>
<td>200</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Armoured combat vehicles</td>
<td>24</td>
</tr>
</tbody>
</table>

Table 2.5 States Parties that reported Exports to Bosnia and Herzegovina

<table>
<thead>
<tr>
<th>Exporter</th>
<th>Importer</th>
<th>Type</th>
<th>Number of units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech Republic</td>
<td>Bosnia and Herzegovina</td>
<td>Sub-machine guns</td>
<td>60</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Rifles and carbines</td>
<td>213</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Sub-machine guns</td>
<td>1,400</td>
</tr>
<tr>
<td>Serbia</td>
<td>Bosnia and Herzegovina</td>
<td>Assault rifles</td>
<td>85</td>
</tr>
<tr>
<td>Slovakia</td>
<td>Bosnia and Herzegovina</td>
<td>Revolvers and self-loading pistols</td>
<td>937</td>
</tr>
<tr>
<td>Switzerland</td>
<td>Bosnia and Herzegovina</td>
<td>Sub-machine guns</td>
<td>20</td>
</tr>
</tbody>
</table>

As additional examples, Czech Republic and Germany reported exports of 130 and 110 units of ‘Sub-machine guns’, respectively, to Luxembourg, which provided a ‘nil’ report for imports. Austria, Netherlands, Portugal, Sweden, Switzerland and the United Kingdom also reported exports of conventional arms to Luxembourg.

Recommendations:

- States Parties should be diligent in ticking the relevant boxes on both the cover page and in Annexes of the ATT reporting template.
- States Parties should be sure reporting officials receive training and education regarding the nature of ‘nil’ reports.
- The ATT Secretariat could initiate dialogue with States Parties to clarify conflicting information presented in Annual Reports.

**“** NOT REPORTING ON EITHER [EXPORTS OR IMPORTS] WHILE ALSO NOT SUBMITTING ‘NIL’ REPORTS RAISES QUESTIONS OF STATES PARTIES’ COMMITMENT TO TRANSPARENCY AND MAKES COMPARATIVE ANALYSIS OF TRANSFER DATA DIFFICULT OR IMPOSSIBLE. **”**
 STATES NOT REPORTING IMPORTS

It is obligatory for States Parties to report on both exports and imports or indicate when no exports or imports occurred by submitting the relevant ‘nil’ reports. Not reporting on either while also not submitting ‘nil’ reports raises questions of States Parties’ commitment to transparency and makes comparative analysis of transfer data difficult or impossible.

Austria and the United Kingdom did not report imports in their 2017 Annual Reports and did not submit ‘nil’ reports for imports. Austria did not submit the front page of the ATT reporting template that allows for the submission of ‘nil’ reports, nor did it include the relevant section on imports in its report. The United Kingdom left the imports section blank.

Despite the lack of import data from Austria and the United Kingdom, transfer data submitted by other States Parties reported exports covering at least 12,295 items to Austria and 1,701 items to the United Kingdom.20

**Recommendations:**
- States Parties should take the necessary measures to fulfil Article 13 obligations, including reporting on imports.

WITHHOLDING OF ‘SENSITIVE’ INFORMATION

The reporting regime under the ATT allows States Parties to withhold information for national security-related data or commercial confidentiality considerations in their Annual Reports. This can be done by ticking a box in the ‘Scope of information’ section to indicate whether such information was withheld ‘in accordance with Article 13.3 of the Treaty’.

Ten States Parties21 declared that they withheld ‘sensitive’ information by ticking the appropriate box within the ATT reporting template, while a further seven22 did not indicate whether they have or have not withheld sensitive information by not checking the relevant boxes. Additionally, France used a national reporting template that did not indicate if sensitive information was withheld, and Austria did not submit the front page of its report. Thirty-one States Parties indicated they did not withhold ‘sensitive’ information.23

There is also no guarantee that other States Parties have provided information in a consistent manner in order to fulfil the objectives of the ATT, suggesting it is possible that countries may have withheld information without declaration. Also, there is a likelihood of certain transfers not being subject to customary procedures for authorization, which means they may not have been included in the Annual Reports (for example, some state institutions, such as the Ministry of Defence, may not be required to seek authorization for import or export). Complexities with regard to the nature of transactions and the identities of buyers and/or sellers could also prevent a State Party from reporting certain transfers.

**Recommendations:**
- States Parties should look to practices used at the sub-regional and/or regional level to determine how best to assess confidentiality while supporting transparency, complying with national legislation and international obligations, and overcoming concerns about the release of sensitive information.24
- When withholding sensitive information, States Parties should indicate in their reports when and what information was withheld, as well as why it was withheld.

STATES ASKING FOR REPORTS TO BE KEPT CONFIDENTIAL

Argentina, Cyprus, Greece and Madagascar each submitted a 2017 Annual Report to the ATT Secretariat on condition of it being kept confidential.

**Recommendations:**
- States Parties should make Annual Reports publicly available.
- States Parties can review information on a case-by-case basis to determine whether information is commercially sensitive or has implications for national security, rather than determining an entire report is sensitive.25

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21 Only transactions that had either Austria or the United Kingdom as a single recipient were taken into account.
22 Bulgaria, Croatia, Dominican Republic, Finland, Germany, Italy, Mauritius, Norway, South Africa and Sweden.
23 Australia, Georgia, Ireland, Mexico, Poland, Moldova and Tuvalu.
DIFFERENT DEFINITIONS OF MAJOR CONVENTIONAL WEAPONS AND SALW

States Parties have several options to define their transfers within the ATT reporting template. However, a small number of States Parties in the past few years have also provided additional definitions of SALW. For example, some States Parties that provided additional SALW definitions have explained that they are only reporting small arms made for military use, such as light machine guns, while excluding recreational firearms, such as hunting rifles.

Differing definitions of SALW transferred may lead one State Party to report the export of certain types of small arms which may not be covered by the importer’s definition of the same weapon type or category (or vice versa).

For example, Switzerland reported exports of 229 ‘Revolvers and self-loading pistols’ and 382 ‘Rifles and carbines’ to Germany which, in turn, did not report these as imports. Similarly, Romania reported exports of 2,530 ‘Revolvers and self-loading pistols’ and 585 ‘Rifles and carbines’ to Germany, which also were not reported as imports. In the 2015 and 2016 Annual Reports submitted by Germany to the ATT, the reason for similar discrepancies was clear as it mentioned in its national definition that it reported transfers of ‘small arms and accessories specially designed for military use’ along with a note specifying that ‘revolvers and self-loading pistols are not covered by the national definition of Small Arms and Light Weapons’. However, in its 2017 Annual Report, Germany did not provide any such explanations.

Differing definitions of major conventional weapons may also be the reason for some discrepancies in reported data. For example, Poland reported the export of five ‘Missiles and missile launchers’ to Bulgaria under category VII (a), describing the item as ‘9P148 Konkurs’. Conversely, Bulgaria reported the import of five ‘Armoured combat vehicles’ under category II, describing the item as ‘BRDM’, additionally mentioning in comments section ‘With 9P148 antitank launcher’. A similar discrepancy was identified in last year’s analysis, where Bulgaria reported the import of armoured combat vehicles from Czech Republic in which Bulgaria recorded the weapon type as category III, while Czech Republic did so as category II.

Recommendations:

- States Parties should provide descriptions of items and comments on transfers where space is given in the ATT reporting template. End-use and end-user information, in particular, is helpful in understanding decision-making rationale in regards to categorization and definition of weapons.
- States Parties should, where relevant, provide additional definitions of SALW and conventional weapons.

ENTREPÔT TRADE

Discrepancies in reporting data may arise due to entrepôt trade, which refers to cases where States Parties base their definitions of transfers on arms physically crossing borders. This involves arms being shipped to certain trading hubs and subsequently re-shipped to another destination. This must not be confused with trans-shipment, which is already covered under ATT obligations. Entrepôt trade is a wider concept that may involve goods being stored at or near a port for extended periods before being shipped to another destination. Some goods may even be formally imported into the state where the entrepôt port is located. Some reports by States Parties may be based on customs data, implying that those reports comprise data of arms being moved in and out of trading hubs instead of the ultimate importer or exporter (which may have reported the transfer in a different way). Contrarily, the trading hub may report the transfers in a different way than that of the original exporter or ultimate recipient.

Recommendations:

- Foster interagency cooperation and coordination so that relevant agencies can work together to collect and distribute information effectively.
- Create a structure that defines specific roles and responsibilities that enables officials to collect and share relevant data; complete, submit, and update national reports; and share good practices and lessons learned.
HUMAN ERROR
Finally, there is a likelihood of human error accounting for discrepancies involving the data on imports and exports.

Recommendations:
- Ensure the appointment of an NPC and identify specific roles and responsibilities for the NPC with regard to reporting.30

CONCLUSION
Analysis finds that 92 per cent of transactions reported in 2017 Annual Reports were not comparable, where an export did not have a corresponding import of a similar type of weapon (or vice versa). While likely reasons for the discrepancies in reporting exports and imports identified in this chapter arise from this mismatch of practice and the different types of information reported by States Parties within reporting templates, it is also clear that certain reporting practices – such as aggregating information, withholding data for ‘commercial sensitivity/national security-related’ reasons without specifying where or how much, and not reporting import – make it difficult or impossible to determine if a State Party’s arms trade policies and systems are consistent with their ATT obligations.

Other reasons transactions could not be compared may be due to fraud (for example, in order to avoid paying tariffs a trader will fail to declare or seek a license for one part of a transfer), States Parties deliberately censoring their reports in order to conceal sensitive information (perhaps without stating that they had done so), or diversion (for example, the weapons left the exporting country and never arrived at the intended destination).

Recommendations included above aim to assist States Parties in accurate, comprehensive and comparable reporting that fulfils the central objective of the ATT to provide greater transparency of the global arms trade and a more comprehensive understanding of global arms transfers.
SOLDIERS FROM THE UK ARMY DURING LIVE FIRE TRAINING.

CREDIT: © CROWN 2015 / CPL. MCALLISTER
CHAPTER 3: ATT REPORTING UPDATES AND INSIGHTS FROM 2018

3.1 - PRELIMINARY REVIEW OF 2018 ANNUAL REPORTS

Transparency in arms transfers is a central component of the Arms Trade Treaty (ATT) and fundamental to achieving the Treaty’s goals and objectives. The reporting requirements in Article 13.3 mandate that every State Party submits an Annual Report on their national arms exports and imports.1 These reports contribute to greater transparency of the global arms trade and facilitate confidence-building, responsibility and accountability in national arms transfer decisions.

Consistent reporting on arms transfers supports effective Treaty implementation. Information captured in the Annual Reports can highlight how States Parties apply export-assessment criteria to specific transfer decisions and ensure export decisions align with the obligations detailed in Articles 6 and 7 of the ATT. Annual reporting also identifies good practice in record-keeping and can detect issues with data collection and collation processes.

REPORTING UPDATES

With more States Parties, new states were required to report on their annual arms exports and imports in 2018. Three States Parties were required to submit an Annual Report for the first time this year: Benin, Honduras and Republic of Korea. Each of these States Parties met their reporting requirements and a fourth State Party, Chile, submitted a 2018 Annual Report though it was not required to do so. This represents a positive trend for reporting compliance among new reporting States Parties.

As of 7 June 2019, an additional 38 States Parties remain consistently in compliance with their reporting obligations, having submitted an Annual Report every year they were required to do so.

Japan has also provided an update of their previously submitted 2018 report. While States Parties are not required to update their Annual Report, Japan’s clarification/correction is a good example of best practice if new or more accurate information is available.

Twenty-seven States Parties have never reported, even though they were required to do so for one or more years.

PREVIEW OF 2018 ANNUAL REPORTS

Of the 103 States Parties to the ATT, 92 were required to submit a 2018 Annual Report by 31 May 2019. States Parties are granted a seven-day grace period by the ATT Secretariat to submit their reports. As of 7 June 2019, 45 States Parties had submitted their reports to the ATT Secretariat, reflecting a completion rate of approximately 49 percent. For comparison, at the same time last year, there was only a 40 percent compliance rate. This indicates a 9 percent increase in the rate of reporting, suggesting a positive trend in compliance with the reporting responsibilities assigned by the Treaty.

States Parties that submitted their reports on-time within the seven-day window are: Albania, Argentina, Australia, Belgium, Benin, Bosnia and Herzegovina, Bulgaria, Chile, Czech Republic, Dominican Republic, Finland, Germany, Honduras, Ireland, Italy, Japan, Latvia, Liberia, Liechtenstein, Lithuania, Madagascar, Mauritius, Monaco, Montenegro, Netherlands, New Zealand, North Macedonia, Norway, Panama, Peru, Poland, Portugal, Republic of Korea, Republic of Moldova, Samoa, Senegal, Serbia, Sierra Leone, Slovakia, Slovenia, Spain, Sweden, Switzerland, the United Kingdom, and Uruguay.

Six States Parties – Honduras, Liberia, Lithuania, Madagascar, Mauritius, and Senegal – elected to keep their 2018 Annual Reports private, representing 11 percent of on-time submitted reports. By comparison, for 2017 Annual Reports, only five percent of on-time reporting States Parties elected to keep their reports private.

Private reporting for 2018 Annual Reports represents some changes in reporting behaviors for certain States Parties. For example, Madagascar also elected to keep its 2017 Annual Report private, whereas Mauritius had previously provided publicly available copies of its 2016 and 2017 Annual Reports. Liberia made its 2015 Annual Report public but elected to keep its 2016 report private. Senegal made its 2015 and 2017 Annual Reports public and elected to keep its 2016 Annual Report private. Lithuania previously submitted public reports from 2015 through 2017. Honduras was not previously required to submit an Annual Report.

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1 Article 13.3 states: “Each State Party shall submit annually to the Secretariat by 31 May a report for the preceding calendar year concerning authorized or actual exports and imports of conventional arms covered under Article 2 (1). Reports shall be made available, and distributed to States Parties by the Secretariat.”
The number of States Parties that submitted their Annual Reports by the deadline appears to be steadily increasing each year, with a notable increase in the number of States Parties that submitted their 2018 Annual Reports on time. By comparison, the completion rate for on-time reporting – that is, the number of reports submitted as a percentage of all reports required to be submitted to the ATT Secretariat in a given year – has varied over the last four years (see table 1).

Table 3.1 – ATT Annual Reports On-Time Reporting Compliance Rates

<table>
<thead>
<tr>
<th>Reporting Year</th>
<th>Number of On-Time Reports Submitted</th>
<th>Reporting Completion Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td>28</td>
<td>28/61 = ~ 46 percent</td>
</tr>
<tr>
<td>2016</td>
<td>32</td>
<td>32/75 = ~ 43 percent</td>
</tr>
<tr>
<td>2017</td>
<td>36</td>
<td>36/89 = ~ 40 percent</td>
</tr>
<tr>
<td>2018</td>
<td>45</td>
<td>45/92 = ~ 49 percent</td>
</tr>
</tbody>
</table>

**INITIAL ASSESSMENT**

An initial review of the contents of the publicly available 2018 Annual Reports leads to the following observations based on the reports received by the deadline:

- Nine States Parties (Argentina, Chile, Czech Republic, Italy, Japan, Netherlands, Norway, Sweden, and Switzerland) submitted reports utilizing the online template provided by the ATT Secretariat. This year marked the first year that the online template was available for use.

- Ten States Parties (Benin, Chile, Dominican Republic, Monaco, North Macedonia, Panama, Peru, Samoa, Sierra Leone, and Uruguay) indicated that they submitted ‘nil’ reports for arms exports, indicating that they did not export any weapons during the 2018 calendar year. One State Party, Japan, did not indicate that it submitted a ‘nil’ report for arms exports, but did not report any exports of major conventional weapons or SALW.

- Four States Parties (Bosnia and Herzegovina, Samoa, Sierra Leone, and Uruguay) indicated that they submitted ‘nil’ reports for arms imports. However, two of these States Parties (Bosnia and Herzegovina and Uruguay) provided information on arms imports.

**EXPORTS**

- Twenty States Parties reported on exports of major conventional weapons. Of these, 15 reported on actual exports and four reported on export authorizations. One State Party, Bosnia and Herzegovina, did not indicate whether it reported on actual imports or authorizations.

- Twenty-eight States Parties reported on exports of SALW. Of these, 16 reported on actual exports and 10 reported on export authorizations. One State Party, Bosnia and Herzegovina, did not indicate whether it reported on actual exports or authorizations. Only one State Party, Portugal, reported on both authorizations and actual exports of SALW.

- One State Party (Switzerland) reported on actual exports of major conventional weapons and authorizations of SALW exports. Portugal reported on actual exports of major conventional weapons and both authorizations and actual exports of SALW.

- Seventeen States Parties reported the number of items exported. Eleven States Parties reported at times on both the number and value of items exported. No States only reported the value of the transfer.

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2 The Dominican Republic marked both ‘nil’ and ‘annual report on imports,’ but provided information on SALW imports. The authors believe the tick box for ‘nil’ reports was erroneously marked.
IMPORTS

• Nineteen States Parties reported on imports of major conventional weapons. Of these, 14 reported on actual imports and three reported on authorizations. Two States Parties, Chile and Finland, did not specify whether they reported on actual imports or authorizations.
• Thirty-Two States Parties reported on imports of SALW. Of these, 16 reported on actual imports of SALW and 11 reported on import authorizations of SALW. For five States Parties, it is unclear if they reported on actual imports, authorizations, or both, because they either marked both options or left the relevant tick boxes blank.
• Twenty-Five States Parties reported the number of items imported and nine reported both the number and value of items imported.
• One State Party, Germany, reported on actual imports of major conventional weapons and authorizations of SALW imports.

CONCLUSION

The current submissions of Annual Reports have neared the 50 percent compliance rate. While this is a positive trend and an increase from previous years, we are still far from universal compliance for a mandatory Treaty obligation. On the positive side, however, all States Parties that had their first Annual Report due this year met their reporting requirements on time. Yet, without a wider commitment to reporting, the efficacy and long-term value of the ATT will be undermined. The Working Group on Transparency and Reporting (WGTR) and ATT Secretariat must work together to continue informing States Parties of reporting deadlines and obligations, identifying gaps in and challenges to reporting and working with States parties to comprehensively and efficiently address those concerns.
RELINQUISHED FIREARMS FROM UNOCI DISARMAMENT OPERATION IN CÔTE D’IVOIRE.

CREDIT: © UN PHOTO / HIEN MACLINE
3.2 - UPDATES ON ATT INITIAL REPORTS AND MONITORING TREATY IMPLEMENTATION

ATT Initial Reports submitted by States Parties continue to serve as a key tool for monitoring ATT implementation and understanding how states interpret and incorporate the Treaty’s provisions into their national control systems. As of 1 February 2019, 94 of the 102 States Parties were due to submit their Initial Reports to the ATT Secretariat. In total, 70 States Parties have done so, representing an overall compliance rate of 74 percent.1

Although initial reporting has slowed over the years as the number of new States Parties has lessened, three States Parties submitted their Initial Reports since the ATT Monitor 2018 Annual Report. This chapter includes a brief analysis of these new reports as well as an examination of two updated reports received by the ATT Secretariat. The chapter also provides an analysis of reporting non-compliance for those States Parties that have failed to submit their Initial Reports and offers insights on challenges to reporting as well as opportunities for strengthening States Parties’ capacities and adhering to the Treaty’s reporting requirements.

RECENT REPORTS

Since the publication of the ATT Monitor 2018 Annual Report, three States Parties submitted their Initial Reports to the ATT Secretariat: Kazakhstan, State of Palestine, and Tuvalu.2 All three elected to keep their reports private on the ATT Secretariat’s website. Therefore, it is not possible to review their implementation practices, to compare their national control systems with those of other States Parties, to assess potential areas of strength and/or weakness, or to identify opportunities for support and/or cooperation to facilitate Treaty implementation. In total, 12 States Parties have chosen to keep their Initial Reports private, representing 17 percent of all Initial Reports submitted to the ATT Secretariat.3 Notably, two States Parties, Republic of Korea and Togo, initially submitted private Initial Reports but later requested the ATT Secretariat make them publicly available.

States Parties continue to use a variety of methods to submit their Initial Reports. Most (61) used the recommended ATT reporting template to complete their submissions. Seven States Parties used the ATT-Baseline Assessment Survey and two used a national format to submit their reports. Different reporting methods make comparison and analysis of the Initial Reports more complicated.

Table 3.2 – Initial Report Submissions by Region (as of 31 May 2019)4

<table>
<thead>
<tr>
<th>Region</th>
<th>Number of States Parties Due to Report</th>
<th>Number of States Parties That Have Reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>Africa</td>
<td>22</td>
<td>11</td>
</tr>
<tr>
<td>Americas</td>
<td>23</td>
<td>12</td>
</tr>
<tr>
<td>Asia</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td>Europe</td>
<td>39</td>
<td>37</td>
</tr>
<tr>
<td>Oceania</td>
<td>4</td>
<td>4</td>
</tr>
</tbody>
</table>

UPDATED REPORTS

In addition to requiring States Parties to submit an Initial Report on ATT implementation, Article 13 (1) of the Treaty also requires them to update their reports and provide the ATT Secretariat with information “on any new measures undertaken in order to implement this Treaty, when appropriate.” As of 31 May 2019, only two States Parties, Japan and Sweden, have submitted updates to their Initial Reports.

Sweden provided an update to its report on 14 September 2018. In the cover page text, it provided an explanation of which questions in its Initial Report it updated. The revision provided updated details for Sweden’s national point of contact and national authority responsible for the control of exports, as well as a note indicating that it updated its national guidelines for export licensing, stating that “the national risk assessment procedures continue to include all the criteria described in Articles 6 and 7 of the Arms Trade Treaty.”5

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1 An overview of the key topics in the Initial Report submissions can be found in ‘Table 2 – Initial Report Data’ at Control Arms Secretariat (2019). ‘Table 2: http://attmonitor.org/en/the-2019-report/.
2 While Tuvalu submitted its report in May 2018, it required clarification and therefore was not published on the ATT Secretariat’s website until after the 2018 ATT Monitor was published.
3 Benin, Burkina Faso, Cyprus, Greece, Honduras, Kazakhstan, Madagascar, Mauritius, Nigeria, Senegal, State of Palestine, and Tuvalu.
Japan, which provided an updated report to the ATT Secretariat dated March 2019, only made cosmetic changes to its report. In a cover sheet, Japan explained that its revisions simply updated links for two specific questions in its Initial Report. In one case, Japan provided the link of the English translation for the revised Foreign Exchange and Foreign Trade Act based on its amendment in 2017. In another case, it provided the updated link for the summary of the Three Principles on Transfer of Defense Equipment and Technology.

No clear process or mechanisms exist yet to facilitate report updates in a consistent and standardized method. Helpfully, both Sweden and Japan provided cover-sheet information that allowed the reader to identify which areas of the report had been updated. Moreover, the reports were dated to reflect the new report submission dates. These simple steps should be identified as good practice and recommended to other States Parties when updating their Initial Reports.

The Working Group on Transparency and Reporting (WGTR) has identified and discussed the need to support States Parties in better understanding and adhering to the obligation to update their Initial Reports as necessary, and in their draft report to the Fourth Conference of States Parties (CSP 2018), the WGTR co-chairs noted that they “asked the ATT Secretariat to include a reminder of this obligation in the reminders they send to States Parties about the annual reporting obligation.”

Although the WGTR has commended Sweden and Japan for submitting their updated reports, there has been no further significant discussion of this process or the content of such updates.

The pace of updating reports has been worryingly slow, which hinders efforts to identify how the ATT has changed national control systems. It also undermines the value of Initial Reports and universal reporting implementation as States Parties are not seeing the practical utility of this reporting. Without updated reports, it becomes harder to monitor progress towards comprehensive Treaty implementation, to highlight good practice on specific implementation topics and to identify gaps and needs in implementation (and the commensurate support to fill those gaps).

CHALLENGES TO REPORTING

States Parties have identified several obstacles to completing their ATT reporting requirements. While they have not offered any new information on particular reporting challenges since the 2018 publication of the ATT Monitor, States Parties have previously offered insights on obstacles to reporting.

The ATT-BAP publication ‘Lessons Learned from Arms Trade Reporting’ provides an inventory of challenges experienced by States Parties with regard to their reporting deficiencies. These include limited resources and capacity, difficulty in accessing and compiling relevant information, and difficulty in maintaining awareness of reporting obligations and deadlines.

In addition, States Parties often have to juggle numerous reporting obligations for a variety of agreements and treaties, which strains government resources and places additional burdens on staff. Some governments may not have established bureaucratic mechanisms for reporting and may lack internal processes for data collection, storage and sharing. With regard to Initial Reports in particular, States Parties may never have had to compile a list of their national practices and may have limited information and limited knowledge of where and how to collect such information, particularly when information is maintained by multiple ministries and agencies. States Parties may also face technical and resource obstacles to compiling and completing their reports.

OPPORTUNITIES FOR STRENGTHENING REPORTING COMPLIANCE

To help identify and mitigate reporting challenges, the ATT Secretariat, the WGTR and several civil society groups have initiated information-sharing mechanisms and developed guidance tools that States Parties can use in meeting their reporting requirements.

The ATT Secretariat provides updates on reporting deadlines and serves as a key resource for States Parties should they have questions about the reporting process, relevant content or other related issues. The WGTR also has, as a recurring task, addressing the challenges States Parties experience in complying with their ATT reporting requirements, including in completing their Initial Reports on Treaty implementation.

The working group has noted that it will serve as a "platform to share problems and difficulties as well as solutions and good practices", and that discussions on reporting challenges can pertain to a wide array of reporting-related concerns, including "understanding the reporting obligations, gathering the information required for reporting, processing this information into reports, capacity challenges and coordination between different authorities (‘interagency cooperation’)." With the help of States Parties, the WGTR has compiled a list of measures for consideration that States Parties could take at a national level to support reporting compliance. This includes creating a national procedures document and an updated list of relevant points of contact involved in reporting, appointing a single point of contact for coordinating reporting efforts across government offices/agencies, creating a data repository for information relevant to ATT reporting, and training personnel involved in collecting and compiling relevant reporting data as well as additional staff to ensure reporting compliance is sustainable over the longer term.

Civil society experts have also created several tools that States Parties can utilize to facilitate reporting compliance, including section-by-section guidance on completing the Initial Report, training videos with insights from government practitioners, databases for identifying needs and available resources to support Treaty implementation, including reporting, and topical papers and backgraders with key insights on fulfilling the Treaty’s reporting requirements.

In surveys, States Parties themselves have identified specific steps that can serve as examples of good practice and mitigate reporting challenges. For example, States Parties have suggested taking advantage of synergies across relevant conventional arms transfer control agreements and using a common online interface to allow them to submit one report for multiple instruments.

States Parties have also identified solutions to internal coordination and communication challenges, such as interagency committees and/or working groups to gather relevant stakeholders to exchange information, assign reporting tasks and coordinate activities across specific authorities and personnel, to develop new initiatives, and to provide expert advice throughout the reporting process.

GENDER AND REPORTING

Ambassador Jānis Kārkliņš of Latvia, president of the Fifth Conference of States Parties (CSP 2019), identified issues of gender and gender-based violence as key themes to discuss in relation to the ATT in the lead up to CSP 2019. Unfortunately, it appears that gender considerations have not yet made their way into ATT reporting. In examining the publicly available Initial Reports, specific references to issues of gender are mostly absent from ATT reporting thus far. Only six States Parties explicitly mention gender as part of their risk assessment processes in their Initial Reports, and only five mention the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) when identifying international agreements to which they are a party and that are considered relevant under Article 6.3 of the ATT.

CONCLUSION

Reporting is an essential element of the ATT and universal compliance with reporting obligations is crucial to the Treaty’s success and effective implementation. Six more States Parties will have their Initial Reports due before the next edition of the ATT Monitor Annual Report in 2020. It is imperative that these States Parties, along with those that have been delinquent in submitting their reports, do so in a timely manner. For all States Parties, it is also important to submit any relevant updates to their Initial Reports regularly, as changes to national control systems are made. The ATT Secretariat, Working Groups and States Parties, with assistance from civil society experts knowledgeable about the unique challenges faced by different states, should continue to work together to identify additional hindrances to reporting compliance and ensure such gaps are filled.

81mm (L16) mortars and UK army soldiers during a live mortar firing exercise.

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