

CHAPTER 3 – PRELIMINARY REVIEW OF 2024 ATT ANNUAL REPORTS AND NEW INITIAL REPORTS

INTRODUCTION

Article 13 of the Arms Trade Treaty (ATT) requires States Parties to submit two types of reports to the ATT Secretariat. Article 13.1 requires States Parties to submit an initial report on measures undertaken to implement the Treaty and Article 13.3 requires States to submit annual reports on actual or authorized arms exports and imports that occurred during the previous calendar year.¹ The initial report is due within one year of the Treaty's entry into force for each State Party, and States Parties are further required to report to the Secretariat, through submission of an updated initial report, on any new measures undertaken to implement the Treaty (e.g., new regulation or legislation governing a State's national control system). States Parties must begin annual reporting the first full calendar year after becoming a State Party to the ATT and continue reporting annually thereafter. Though the Treaty requires annual reports to be submitted by 31 May each year, the Secretariat provides a seven-day grace period, resulting in a 7 June de-facto yearly deadline.

Initial and annual reporting is fundamental to the ATT's ability to achieve its transparency object and purpose, as described in Article 1.² Initial reports play a vital role in monitoring and evaluating ATT implementation, providing an opportunity to explore how States Parties interpret and apply their Treaty obligations at the national level. Initial reports enable States Parties to critically examine their own existing national control architectures; learn good practices from other States Parties; facilitate assessments of regulatory, legal, or organizational gaps and subsequent assistance needs; and act as markers for Treaty compliance and impact over time. Annual reports provide important visibility into the global arms trade, acting

as a mechanism for identifying potentially destabilizing weapon accumulations and instances of arms diversion; for supporting international human rights and humanitarian law monitoring efforts; and for confidence-building among States Parties. Annual reporting is also essential for verifying Treaty compliance and assessing Treaty implementation.

This chapter provides an update on the status of ATT initial reporting, a preview of annual reporting for 2024, and an overview of States Parties' compliance with ATT reporting obligations. A preliminary assessment of annual reports submitted for the 2024 calendar year – as well as reports due in previous years that have been submitted since last year's reporting deadline – are followed with an analysis of new initial report submissions and reporting trends.

ANNUAL REPORTS

PREVIEW OF 2024 ANNUAL REPORTS

One hundred and thirteen of the 116 States Parties to the ATT were required to report to the ATT Secretariat on their 2024 arms exports and imports by 31 May. The newest States Parties – The Gambia, Malawi and Colombia – were not required to submit a 2024 annual report.³ As of 7 June 2025, 50 States Parties had submitted annual reports for 2024:

- Argentina, Australia, Belgium, Benin, Bosnia and Herzegovina, Botswana, Brazil, Bulgaria, Canada, Costa Rica, Côte d'Ivoire, Czech Republic, Dominican Republic, El Salvador, Finland, Georgia, Greece, Guatemala, Ireland, Italy, Jamaica, Japan, Latvia, Lesotho, Liechtenstein, Lithuania, Madagascar, Mexico, Netherlands, New Zealand, Norway, Palau, Paraguay, People's Republic of China, Peru, Philippines, Poland, Romania, Senegal, Serbia, Seychelles, Sierra Leone, Slovakia, Slovenia, South Africa, Spain, State of Palestine, Sweden, Switzerland and Uruguay.

1 Arms Trade Treaty, Article 13 (adopted 2 April 2013, entered into force 24 December 2014). <https://unoda-web.s3.amazonaws.com/wp-content/uploads/2013/06/English7.pdf>.

2 'The object of this Treaty is to: Establish the highest possible common international standards for regulating or improving the regulation of the international trade in conventional arms; Prevent and eradicate the illicit trade in conventional arms and prevent their diversion; for the purpose of: Contributing to international and regional peace, security and stability; Reducing human suffering; Promoting cooperation, transparency and responsible action by States Parties in the international trade in conventional arms, thereby building confidence among States Parties'. Arms Trade Treaty, Article 1 (adopted 2 April 2013, entered into force 24 December 2014). <https://unoda-web.s3.amazonaws.com/wp-content/uploads/2013/06/English7.pdf>.

3 The Gambia and Malawi are required to submit their first annual reports in 2026, and Colombia's first annual report is due in 2027. ATT Secretariat, 'States Parties to the ATT (in order of deposit of instrument of ratification, approval, acceptance, or accession)', as of 17 October 2024. <https://bit.ly/4jBHdXD>.

For methodological rigor and consistency, the ATT Monitor traditionally limits its analysis each year to the reports that are available on the Secretariat's website as of 7 June, though it is possible that reports submitted on time may not be accurately reflected on the ATT Secretariat's website. However, this year the Monitor was able to confirm the number of on-time reports with the Secretariat. Thus, this year's analysis is based upon the actual number of on-time reports submitted to the ATT Secretariat by 7 June 2025.⁴

For 2024 reports, there was an on-time reporting rate of 44 per cent. Four of the past five years have seen 44 per cent on-time reporting rates. The only exception was the 2022 report submissions, which had an on-time compliance rate of 35 per cent.

Notably, nine of these 50 on-time reporters are considered Least Developed Countries or Small Island Developing States by the United Nations,⁵ and 26 (52 per cent) are non-Western.⁶

Table 3.1 - ATT Annual Reports on-time reporting rates

Reporting Year	Number of On-Time Reports (using de facto 7 June deadline)	On-Time Compliance Rate (as percentage of reports due)
2015	30	49%
2016	31	41%
2017	37	42%
2018	46	50%
2019	37	38%
2020	46	44%
2021	48	44%
2022	38	35%
2023	49	44%
2024	50	44%

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FOR 2024 REPORTS, THERE WAS AN ON-TIME REPORTING RATE OF 44 PER CENT. FOUR OF THE PAST FIVE YEARS HAVE SEEN 44 PER CENT ON-TIME REPORTING RATES. THE ONLY EXCEPTION WAS THE 2022 REPORT SUBMISSIONS, WHICH HAD AN ON-TIME COMPLIANCE RATE OF 35 PER CENT.

4 The list of States Parties that submitted on-time reports was provided through correspondence with the ATT Secretariat.

5 The five Least Developed Countries that submitted on-time 2024 reports are: Benin, Lesotho, Madagascar, Senegal and Sierra Leone. The four Small Island Developing States that submitted on-time 2024 reports are: Dominican Republic, Jamaica, Palau and Seychelles.

6 Argentina, Benin, Botswana, Brazil, Costa Rica, Côte d'Ivoire, Dominican Republic, El Salvador, Georgia, Guatemala, Jamaica, Japan, Lesotho, Madagascar, Mexico, Palau, Paraguay, People's Republic of China, Peru, Philippines, Senegal, Seychelles, Sierra Leone, South Africa, State of Palestine and Uruguay.

Of the 50 States Parties that submitted on-time 2024 annual reports, 13 (26 per cent) chose to report privately – meaning that these reports are available only to the ATT Secretariat and other States Parties.⁷ While this marks an increase in confidential, on-time reporting when compared to the 22 per cent of on-time 2023 reports submitted last year, it is still a welcome decline from the 32 per cent of 2021 on-time reports submitted privately.

Paraguay, which had previously submitted all its prior annual reports publicly, opted to submit its on-time 2024 and past-due 2020-2023 reports privately. In contrast, Greece – which submitted an overdue 2023 report alongside its on-time 2024 report – submitted both reports publicly after having submitted its six prior annual reports (covering the years 2017 to 2022) confidentially. Of note, Finland submitted a public 2024 report after submitting its 2023 report in a 'hybrid' format – submitting a public report on exports and a private report on imports – which marked the first occurrence of a State Party bifurcating an annual report. Finland had previously submitted a fully private report for the 2022 reporting period (after seven years of public reporting) and returned to fully public reporting this year with its on-time 2024 submission.

Some States that submitted an on-time 2024 annual report, such as Brazil, Côte d'Ivoire, Guatemala, People's Republic of China, Philippines, Seychelles and State of Palestine have only ever submitted private reports. However, other States that reported privately this year have histories of public reporting. Latvia and Lithuania submitted multiple public reports in their first years of ATT reporting (respectively submitting their 2015-2020 and 2015-2017 reports publicly) but have now submitted private reports for four and seven consecutive years. Georgia has submitted private reports for seven consecutive years, but its first report – covering transfers made in 2017 – was public. Similarly, while Senegal alternated between public and private submissions in its early years of reporting, it has now submitted confidential annual reports for the last seven years. Slovakia submitted a

private report this year after submitting publicly for eight years, but its first report (covering transfers made in 2015) was private. Paraguay was the only State that submitted a private report for the first time this year.

REPORTING UPDATES

A total of 43 overdue reports were submitted between 7 June 2024 (last year's de facto reporting deadline) and 7 June 2025.⁸ Of these reports, 25 were 2024 reports covering 2023 transfers⁹ and 18 were from prior years.¹⁰ Guatemala submitted six past-due reports for 2017-2020, 2022, and 2023; Paraguay submitted four past-due reports for 2020-2023; Republic of Moldova submitted four past-due reports for 2020-2023; Brazil submitted three past-due reports for 2019-2021; both Kazakhstan and Nigeria submitted their past-due 2022 and 2023 reports; Malta submitted its past-due 2018 report; and Botswana submitted its past-due 2020 report.

With these States Parties submitting overdue reports, the number of States Parties that have submitted an annual report for every year they were required to do so has increased. As of 7 June 2025, 48 of the 113 States Parties (42 per cent) due to report had submitted all their required annual reports.¹¹ This is a slight improvement from last year, when as of 7 June the full compliance rate was 44 out of 112 (39 per cent). Further, it is likely that this figure will continue to improve as more States Parties submit their 2024 reports in the coming months.

On the other hand, the number of States Parties that have not fulfilled their annual reporting obligations has remained static. As of 7 June 2025, 25 States Parties (22 per cent of the 113 due to have reported at least once) had yet to submit any of their required annual reports.¹² This is the same in absolute numbers from this time last year, when 25 States Parties (22 per cent of the 112 due to have reported at least once) had yet to submit any of their required annual reports.¹³ However, the current

7 The 13 States Parties that submitted private on-time reports are: Brazil, Côte d'Ivoire, Georgia, Guatemala, Latvia, Lithuania, Paraguay, People's Republic of China, Philippines, Senegal, Seychelles, Slovakia and State of Palestine.

8 Overdue reports (covering transfers made from 2015 to 2023) that were submitted and available on the ATT Secretariat's website as of 7 June 2025 are included in this section's analysis.

9 The 25 States Parties that submitted overdue 2023 reports during this year's reporting period are: Austria, Barbados, Chile, Costa Rica, Croatia, Dominican Republic, Estonia, Finland, France, Germany, Greece, Guatemala, Hungary, Kazakhstan, Maldives, Nigeria, Norway, Palau, Paraguay, Philippines, Poland, Republic of Moldova, Slovakia, South Africa and United Kingdom of Great Britain and Northern Ireland.

10 Eight States submitted a total of 18 overdue reports spanning transfers that occurred between 2017 and 2022: Botswana, Brazil, Guatemala, Kazakhstan, Malta, Nigeria, Paraguay and Republic of Moldova.

11 Argentina, Australia, Belgium, Benin, Bosnia and Herzegovina, Botswana, Brazil, Bulgaria, Canada, Costa Rica, Côte d'Ivoire, Czech Republic, Dominican Republic, El Salvador, Finland, Georgia, Greece, Guatemala, Ireland, Italy, Jamaica, Japan, Latvia, Lesotho, Liechtenstein, Lithuania, Madagascar, Mexico, Netherlands, New Zealand, Norway, Palau, People's Republic of China, Peru, Philippines, Poland, Romania, Senegal, Serbia, Sierra Leone, Slovakia, Slovenia, South Africa, Spain, State of Palestine, Sweden, Switzerland and Uruguay.

12 Afghanistan, Andorra, Bahamas, Belize, Cabo Verde, Central African Republic, Chad, Dominica, Gabon, Ghana, Grenada, Guinea, Guinea-Bissau, Guyana, Lebanon, Mauritania, Mozambique, Namibia, Niue, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, San Marino, São Tomé and Príncipe and Togo.

13 There was a slight change in the actual States listed – the Philippines was removed from the list after submitting its 2023 and 2024 reports this year, and Andorra has been added to the list after not submitting its 2024 annual report (the first report it has been required to submit since becoming a State Party).

number of States Parties that have yet to submit an annual report is still a slight improvement from 2023, when 26 States Parties had yet to submit any of their required annual reports.

While States Parties are encouraged to submit their reports on time, it is important to emphasize that overdue reports are always welcome. Even when submitted late, such reports provide valuable insights and continue to support meaningful analysis of arms trade trends and Treaty implementation. Despite the challenges posed by delayed reporting, each contribution provides more information on global arms transfers and supports fulfillment of the Treaty's object and purpose.

The only State Party required to submit an annual report for the first time this year, Andorra, has not yet reported. Andorra's non-submission highlights the importance of targeted outreach and assistance to support first-time reporters in meeting their obligations.

On a more positive note, in an intervention at the February 2025 Working Group meetings, Canada noted that it had noticed an error in its 2023 annual report and subsequently submitted an amended report to the ATT Secretariat, fixing its error. Canada should be commended for this effort, and States Parties should be encouraged to review and correct their past submissions if necessary.

INITIAL ASSESSMENT

Although States Parties will continue submitting 2024 annual reports in the coming months, there are useful insights that can be drawn from the reports submitted as of 7 June 2025.

Public, on-time reporters continue to prefer the recommended reporting template. Of the 37 public 2024 reports submitted by 7 June 2025, 29 States Parties (78 per cent) used a version of the recommended template, which includes the template introduced at the Second Conference of States Parties (CSP2) in 2016 and the template endorsed by the Seventh Conference of States Parties (CSP7) in 2021. This reflects a decrease from this time in 2024, when 32 of the 38 public reports analyzed (84 per cent) were prepared using a version of the recommended template. Similar to last year, the most popular version was the CSP7 2021 template, accounting for 28 of the 29 (97 per cent) template submissions.¹⁴ One State Party,

South Africa, submitted its 2024 report using the previously recommended version of the template, introduced at CSP2. The ATT Secretariat's online reporting tool, which mirrors the CSP7 template, was utilized by five States Parties (14 per cent of the 37 public reports),¹⁵ a slight increase from the four States Parties that submitted using the online template by 7 June 2024. The remaining three States Parties (Canada, Greece and Netherlands), or eight per cent of public on-time submissions, used their UN Register of Conventional Arms (UNROCA) report as their 2024 ATT annual report, which represents an increase from last year's reporting deadline when only two States Parties had submitted using a UNROCA report.

Fewer on-time 2024 public reporters submitted 'nil' reports than last year, when 13 States submitted 'nil' reports for imports, exports or both by 7 June 2024. As of 7 June 2025, seven States Parties (Benin, Botswana, Dominican Republic, El Salvador, Lesotho, Peru and Uruguay) reported 'nil' for exports and three States Parties (Madagascar, Palau and Sierra Leone) reported 'nil' for both exports and imports. Of those that indicated they had submitted a 'nil' report on either exports or imports on the first page of the template, each (Benin, Botswana, Dominican Republic,¹⁶ El Salvador, Lesotho, Madagascar, Palau, Peru, Sierra Leone and Uruguay) also submitted the correct 'nil' report using Annex 3. However, some confusion seems to persist around 'nil' reporting, suggesting that more attention should be given to clarifying 'nil' submission practices. One State Party (Costa Rica) submitted a 'nil' report for exports via Annex 3 but did not indicate doing so on the first page of its report. Another three States Parties (Bosnia and Herzegovina, Serbia and South Africa) left the questions on 'nil' reporting blank, but all reported both exports and imports.

In accordance with ATT Article 13.3, States Parties are permitted to withhold commercially sensitive or national security information.¹⁷ The ATT annual report template allows States to indicate if they have (or not) withheld such information from their reports or provide comments in their reports on the types of information withheld. Of the 2024 on-time reporters that submitted their reports publicly, 11 States Parties (30 per cent) indicated that they had withheld information.¹⁸ Ten of these States Parties indicated they had withheld information by utilizing the checkbox on the CSP7 recommended template, and one (Netherlands) –

14 Australia, Belgium, Benin, Bosnia and Herzegovina, Botswana, Bulgaria, Costa Rica, Dominican Republic, El Salvador, Ireland, Italy, Jamaica, Japan, Lesotho, Liechtenstein, Madagascar, Mexico, New Zealand, Norway, Palau, Peru, Romania, Serbia, Sierra Leone, Slovenia, Sweden, Switzerland and Uruguay.

15 Argentina, Czech Republic, Finland, Poland and Spain.

16 The Dominican Republic's 'nil' report on exports is labelled as 'Annex 2' rather than 'Annex 3', but was otherwise completed correctly.

17 Arms Trade Treaty, Article 13.3 (adopted 2 April 2013, entered into force 24 December 2014). <https://unoda-web.s3.amazonaws.com/wp-content/uploads/2013/06/English7.pdf>.

18 Argentina, Australia, Belgium, Bulgaria, Finland, Ireland, Netherlands, Norway, Poland, Romania and Sweden.

which submitted using its UNROCA report – indicated that information was withheld through comments in the body of its report. Ten States Parties indicated withholding information in their 2023 (26 per cent) and 2022 (38 per cent) on-time annual public reports. Indicating whether information was withheld is better practice than choosing not to indicate at all (and should thus be commended).

In another instance of good reporting practice, several States Parties made efforts to specify the nature of their information withholdings. In one example, Sweden marked that the number and value of recoilless rifles and portable anti-tank missile launchers and rocket systems it exported was 'classified', and listed the final importing States in aggregate. Poland noted that '[t]he data included in the annual report do not include... imports to Poland of certain categories of conventional weapons (I-VII) - in accordance with Article 13.3 of the Arms Trade Treaty'.

Four States Parties (Australia, Belgium, Netherlands and Poland) indicated that at least some of the information withheld from their 2024 reports was in relation to their exports to Ukraine. Belgium commented that the number of AIM 9M Sidewinder missiles it exported to Ukraine was 'withheld for security reasons'. The Netherlands reported on the number, type, and model of weaponry sent to Ukraine in several instances, but did not provide the number of F-16 aircraft, missiles and missile launchers, and heavy machine guns '[d]ue to NLD security regulations'. States should periodically review the withholding of such information in past reports, and if it is not essential for such information to remain confidential, to update their reports accordingly.

States continue to provide relatively limited reporting on national categories and definitions, with only six States Parties (Belgium, Costa Rica, Dominican Republic, Japan, New Zealand and Switzerland) reporting 2024 transfers

under national categories or indicating that they had reported on national definitions. Two States utilized regional or international categorization systems: Belgium continued its practice of reporting under European Common Military List 'ML1: Smooth-bore weapons with a calibre of less than 20 mm, other arms and automatic weapons with a calibre of 12,7 mm (calibre 0,50 inches) or less', and Japan continued its practice of reporting its small arms exports and imports under the International Trade Administration's (World Customs Organization) harmonized system codes. Three States utilized the national categories section of the CSP7 template to report on weapon types not included in the UN Register Categories I-VII. New Zealand reported on its exports and imports of shotguns, and both Costa Rica and the Dominican Republic reported on imports of ammunition and tear gas.

As with the practice of 'nil' reporting, evidence of confusion about national definitions and categories points to a need for further efforts of clarification and training among States Parties. Switzerland indicated that it had used national definitions in its 2024 annual report but did not report under national categories or provide information on national definitions. As previously mentioned, Costa Rica reported under nationally defined categories, but did not elaborate on definitions.

States continue to not leverage the full potential of synergies across multilateral reporting instruments. Twenty-five States Parties (68 per cent of the 37 on-time public reporters) indicated that information in their 2024 annual report submissions could be shared with the UN Office for Disarmament Affairs (UNODA) for UNROCA reporting.¹⁹ Three States Parties submitted their 2024 ATT reports using the UNROCA template, and the remaining nine public reporters that used the recommended CSP7 template left the section blank (indicating 'no').²⁰



AS WITH THE PRACTICE OF 'NIL' REPORTING, EVIDENCE OF CONFUSION ABOUT NATIONAL DEFINITIONS AND CATEGORIES POINTS TO A NEED FOR FURTHER EFFORTS OF CLARIFICATION AND TRAINING AMONG STATES PARTIES.

19 Argentina, Australia, Benin, Bosnia and Herzegovina, Botswana, Costa Rica, Dominican Republic, El Salvador, Finland, Italy, Jamaica, Lesotho, Liechtenstein, Madagascar, Mexico, New Zealand, Norway, Palau, Peru, Serbia, Sierra Leone, Spain, Sweden, Switzerland and Uruguay.

20 Canada, Greece and Netherlands reported using their UNROCA reports. Belgium, Bulgaria, Czech Republic, Ireland, Japan, Poland, Romania, Slovenia, and South Africa left the question blank (indicating 'no').

EXPORTS

- Twenty-six of the 37 States Parties that submitted on-time and public 2024 annual reports reported conventional arms exports.²¹ Of these, nine States Parties only reported small arms and light weapons (SALW) exports²² and 17 reported both major arms and SALW exports²³ (all 17 States Parties that reported major arms exports also reported SALW exports).
- Of the 17 States Parties that reported exporting major conventional arms during the previous year, three reported authorized major arms exports (Australia, Italy and South Africa), 11 reported actual major arms exports,²⁴ and one reported a combination of authorized and actual major arms exports (Belgium). Two States Parties (Bosnia and Herzegovina and Finland) did not indicate whether their reported major arms exports represented actual or authorized transfers.
- All 26 States Parties that reported exports of conventional arms in their on-time and public 2024 annual reports reported SALW exports.²⁵ Of these, six States Parties reported authorized SALW exports (Australia, Ireland, Italy, Jamaica, New Zealand and South Africa), 15 reported actual SALW exports,²⁶ two reported a combination of authorized and actual SALW exports (Belgium and Switzerland), two did not indicate whether their reported SALW exports represented actual or authorized transfers (Bosnia and Herzegovina and Finland), and one (Mexico) marked that each SALW export was both authorized and actual. A lack of clarity in the indication of actual versus authorized transfers continues to be a barrier to transparency.
- Twenty of the 26 States Parties that reported arms exports in their public, on-time 2024 submissions provided the number of items transferred²⁷ and six (Australia, Belgium, Bosnia and Herzegovina, Japan, Norway and Slovenia) provided a combination of value and number. For States that provided a combination of value and number, the practice varied. For example, both Bosnia and Herzegovina and Slovenia provided the number and value for each of its exports, while Japan only provided the quantity of its major arms and light weapons exports but provided the number and value for its small arms exports. Norway mostly reported the quantity of its exports but added that its donated exports to Ukraine were 'Free'.



21 Argentina, Australia, Belgium, Bosnia and Herzegovina, Bulgaria, Canada, Czech Republic, Finland, Greece, Ireland, Italy, Jamaica, Japan, Liechtenstein, Mexico, Netherlands, New Zealand, Norway, Poland, Romania, Serbia, Slovenia, South Africa, Spain, Sweden and Switzerland.

22 Argentina, Ireland, Jamaica, Japan, Liechtenstein, Mexico, New Zealand, Romania and Slovenia.

23 Australia, Belgium, Bosnia and Herzegovina, Bulgaria, Canada, Czech Republic, Finland, Greece, Italy, Netherlands, Norway, Poland, Serbia, South Africa, Spain, Sweden and Switzerland.

24 Bulgaria, Canada, Czech Republic, Greece, Netherlands, Norway, Poland, Serbia, Spain, Sweden and Switzerland.

25 Argentina, Australia, Belgium, Bosnia and Herzegovina, Bulgaria, Canada, Czech Republic, Finland, Greece, Ireland, Italy, Jamaica, Japan, Liechtenstein, Mexico, Netherlands, New Zealand, Norway, Poland, Romania, Serbia, Slovenia, South Africa, Spain, Sweden and Switzerland.

26 Argentina, Bulgaria, Canada, Czech Republic, Greece, Japan, Liechtenstein, Netherlands, Norway, Poland, Romania, Serbia, Slovenia, Spain and Sweden.

27 Argentina, Bulgaria, Canada, Czech Republic, Finland, Greece, Ireland, Italy, Jamaica, Liechtenstein, Mexico, Netherlands, New Zealand, Poland, Romania, Serbia, South Africa, Spain, Sweden and Switzerland.

IMPORTS

- Thirty-four of the 37 public annual reports submitted to the ATT Secretariat as of 7 June 2025 reported conventional arms imports.²⁸ Of these, 16 reported both major arms and SALW imports,²⁹ 17 reported only SALW imports³⁰ and one (Finland) reported only major arms imports.
- Of the 17 States Parties that reported major arms imports, two (Italy and Peru) reported authorized imports, 13 reported actual imports,³¹ one State Party (Belgium) reported using a mix of authorized and actual imports and one State Party (Finland) failed to indicate whether its reported major arms imports reflected actual or authorized transfers.
- Of the 37 public annual reports for 2024 submitted as of 7 June 2025, 33 States Parties reported SALW imports.³² Three States Parties (Belgium, Jamaica and South Africa) reported authorized SALW imports and 23 reported actual SALW imports.³³ A lack of clarity in States' reporting practices continues to hinder analysis of authorized versus actual transfers. Three States Parties (the Dominican Republic, Mexico and Peru) marked that each SALW import represented both authorized and actual transfers, and another three States Parties (Bosnia and Herzegovina, El Salvador and Ireland) did not indicate authorized or actual for any category of SALW import. Three States

Parties (Dominican Republic, Mexico and Spain) neglected to indicate if transfers were authorized or actual in one category of SALW import, and two States Parties (Argentina and Slovenia) neglected to indicate if transfers were authorized or actual in multiple SALW import categories.

- One State Party (Belgium) reported differently on its major arms imports as compared to its SALW imports, reporting a combination of authorized and actual major arms imports and only authorized SALW imports.
- Twenty-five of the 34 States Parties that reported arms imports in their public, on-time submissions only provided the number of items transferred³⁴ and nine States provided a combination of value and number. Of those that reported with a combination, six (Bosnia and Herzegovina, Botswana, Norway, Peru, Slovenia and Uruguay) provided both the number and value of each of their imports. Australia reported its SALW imports by quantity but reported its major arms imports with a combination of only quantity, only value, or both quantity and value. As it did for exports, Japan provided the quantity of its major arms and light weapons imports but gave the quantity and value for its small arms imports. Belgium reported the quantity of its major arms imports while only noting the value of the SALW imports it reported under national categories.



A LACK OF CLARITY IN STATES' REPORTING PRACTICES CONTINUES TO HINDER ANALYSIS OF AUTHORIZED VERSUS ACTUAL TRANSFERS.

²⁸ Argentina, Australia, Belgium, Benin, Bosnia and Herzegovina, Botswana, Bulgaria, Canada, Costa Rica, Czech Republic, Dominican Republic, El Salvador, Finland, Greece, Ireland, Italy, Jamaica, Japan, Lesotho, Liechtenstein, Mexico, Netherlands, New Zealand, Norway, Peru, Poland, Romania, Serbia, Slovenia, South Africa, Spain, Sweden, Switzerland and Uruguay.

²⁹ Argentina, Australia, Belgium, Bulgaria, Czech Republic, Greece, Italy, Japan, Norway, Peru, Romania, Serbia, Slovenia, Spain, Sweden and Uruguay.

³⁰ Benin, Bosnia and Herzegovina, Botswana, Canada, Costa Rica, Dominican Republic, El Salvador, Ireland, Jamaica, Lesotho, Liechtenstein, Mexico, Netherlands, New Zealand, Poland, South Africa and Switzerland.

³¹ Argentina, Australia, Bulgaria, Czech Republic, Greece, Japan, Norway, Romania, Serbia, Slovenia, Spain, Sweden and Uruguay.

³² Argentina, Australia, Belgium, Benin, Bosnia and Herzegovina, Botswana, Bulgaria, Canada, Costa Rica, Czech Republic, Dominican Republic, El Salvador, Greece, Ireland, Italy, Jamaica, Japan, Lesotho, Liechtenstein, Mexico, Netherlands, New Zealand, Norway, Peru, Poland, Romania, Serbia, Slovenia, South Africa, Spain, Sweden, Switzerland and Uruguay.

³³ Argentina, Australia, Benin, Botswana, Bulgaria, Canada, Costa Rica, Czech Republic, Greece, Japan, Lesotho, Liechtenstein, Netherlands, New Zealand, Norway, Poland, Romania, Serbia, Slovenia, Spain, Sweden, Switzerland and Uruguay.

³⁴ Argentina, Benin, Bulgaria, Canada, Costa Rica, Czech Republic, Dominican Republic, El Salvador, Finland, Greece, Ireland, Italy, Jamaica, Lesotho, Liechtenstein, Mexico, Netherlands, New Zealand, Poland, Romania, Serbia, South Africa, Spain, Sweden and Switzerland.

UPDATES ON ATT INITIAL REPORTS

RECENT REPORTS

While no new States Parties were required to submit an initial report since last year's ATT Monitor Report (between 7 June 2024 and 7 June 2025), two States Parties submitted overdue reports. The Bahamas (report due December 2015) and Andorra (report due March 2024) had their reports uploaded to the ATT Secretariat website in September 2024 and May 2025, respectively. The ATT's three newest States Parties – The Gambia, Malawi and Colombia – are required to submit their initial reports by 10 September 2025, 8 October 2025 and 12 January 2026, respectively.³⁵

The Bahamas' and Andorra's reports illustrate the importance of submitting initial reports even when they are past due. While States Parties should be encouraged to submit their reports on time, it is never too late to submit an initial report. Of note, both the Bahamas and Andorra submitted their reports confidentially (to be discussed in further detail below).

Initial reporting compliance remains low for the Treaty's newest members. Of the eight States Parties that have been required to submit an initial report since January 2021, four States (50 per cent) have yet to do so.³⁶ A concerted effort should be made to encourage the three new States Parties to submit their reports over the next year.

NON-COMPLIANCE

One hundred and thirteen of the current 116 States Parties to the ATT are required to submit initial reports.³⁷ As of 7 June 2025, 93 States Parties have done so (according to the ATT Secretariat's website), which represents a compliance rate of 82 per cent. Overall, this year marks a four-year period of steady gains in initial reporting compliance rates, from 77 per cent in 2021 to 78 per cent in 2022, 79 per cent in 2023, and 81 per cent in 2024.

Of the 20 States Parties that have yet to meet their initial reporting obligations, all are several years past their due date. Thirteen States Parties (65 per cent of the States that have not submitted an initial report) are seven or more years late on their initial reports,³⁸ six (30 per cent) are between four and five years late,³⁹ and one country (Gabon) is less than two years past its initial reporting deadline.



DANISH LEOPARD 2A7 MAIN BATTLE TANKS FROM NATO MULTINATIONAL BRIGADE LATVIA MOVE TO A DIFFERENT POSITION DURING EXERCISE RESOLUTE WARRIOR AT MILITARY BASE ĀDAŽI TRAINING AREA, LATVIA, ON 05 NOVEMBER 2024.

CREDIT: "© CORPORAL MARC-ANDRÉ LECLERC / NATO MULTINATIONAL BRIGADE LATVIA IMAGERY
(ID: 20241105RPBJ0124D007 - SOURCE: [HTTPS://COMBATCAMERA.FORCES.GC.CA](https://COMBATCAMERA.FORCES.GC.CA))

35 ATT Secretariat, 'States Parties to the ATT (in order of deposit of instrument of ratification, approval, acceptance, or accession)', as of 17 October 2024. <https://bit.ly/4jBHDxD>.

36 Afghanistan, Andorra, Gabon, Namibia, Niue, People's Republic of China, Philippines and São Tomé and Príncipe have been required to submit their initial reports since 2021. Half of these (Afghanistan, Gabon, Niue and São Tomé and Príncipe) have yet to submit reports.

37 ATT Secretariat (2024), 'Treaty Status' <https://thearmstradetreaty.org/treaty-status.html>.

38 Cabo Verde, Central African Republic, Chad, Dominica, Ghana, Guinea, Guyana, Mali, Mauritania, Saint Kitts and Nevis, Saint Lucia, San Marino and Seychelles.

39 Afghanistan, Guinea-Bissau, Lebanon, Mozambique, Niue and São Tomé and Príncipe.

Table 3.2 – States Parties with overdue ATT Initial Reports

State Party	Initial Report Deadline
Guyana	23 December 2015
Mali	23 December 2015
Saint Lucia	23 December 2015
Guinea	18 January 2016
Saint Kitts and Nevis	14 March 2016
Chad	22 June 2016
Dominica	18 August 2016
San Marino	26 October 2016
Mauritania	21 December 2016
Central African Republic	04 January 2017
Seychelles	30 January 2017
Ghana	20 March 2017
Cabo Verde	21 December 2017
Guinea-Bissau	20 January 2020
Mozambique	13 March 2020
Lebanon	06 August 2020
São Tomé and Príncipe	25 October 2021
Afghanistan	26 October 2021
Niue	03 November 2021
Gabon	19 December 2023

Despite failing to meet legally required reporting obligations in the context of the ATT, many of the non-reporting ATT States Parties have reported to other relevant instruments on elements of their arms transfer systems, including as part of voluntary reporting regimes. Of the 20 States Parties that have yet to submit required initial reports, 15 (75 per cent) have reported to the UN Program of Action on Small Arms and Light Weapons (PoA) at least once,⁴⁰ including 11 (55 per cent)⁴¹ which have submitted a report to the PoA since 2015 – the first year of ATT reporting – and eight (40 per cent)⁴² which have reported to the PoA since their ATT reporting obligation took effect.⁴³

Although States Parties are required under Article 13.1 to 'report to the Secretariat on any new measures undertaken in order to implement this Treaty, when appropriate', it does not appear as though any updated reports were submitted to the ATT Secretariat since the 2024 ATT Monitor Annual Report.⁴⁴ To date, only six States Parties (Hungary, Japan, New Zealand, Romania, Slovenia and Sweden) have ever submitted updated reports – despite multiple States Parties having indicated at formal and informal ATT meetings that they have made changes to their national control systems since submitting their initial reports, and despite the fact that 50 per cent of current reports were submitted over nine years ago.

Updated initial reports are indicators of compliance with States Parties' international legal obligation to report to the ATT Secretariat on new measures of implementation. The Secretariat and other stakeholders should work with States Parties to clarify the process and expectations related to the updating of initial reports and provide assistance to those that submitted reports more than five years ago or that have publicly announced changes to their national control systems. A basic survey asking States Parties if they have updated their national control systems since submitting their initial reports would help the Secretariat identify which States may need support to complete updates.

CONFIDENTIAL REPORTING

As of 7 June 2025, 23 of the 93 initial reports (25 per cent) available on the ATT Secretariat's website are confidential. Notably, this year's two new initial reports (Bahamas and Andorra) both submitted their initial reports privately. This is in stark contrast to last year (the 2024 ATT Monitor reporting period of 7 June 2023 – 7 June 2024), when all three initial reports that were submitted (Barbados, Namibia and Philippines) were public.

40 Afghanistan, Cabo Verde, Central African Republic, Chad, Gabon, Ghana, Guinea, Guinea-Bissau, Guyana, Lebanon, Mali, Mauritania, Mozambique, San Marino and São Tomé and Príncipe.

41 Afghanistan, Cabo Verde, Central African Republic, Ghana, Guinea, Guinea-Bissau, Lebanon, Mali, Mauritania, Mozambique and San Marino.

42 Cabo Verde, Central African Republic, Ghana, Guinea, Guinea-Bissau, Mali, Mauritania and San Marino.

43 UN Office of Disarmament Affairs, 'National reports,' UN Programme of Action on small arms and light weapons, <https://smallarms.un-arm.org/national-reports>.

44 ATT Secretariat. (2025). 'Arms Trade Treaty: Status of Reporting,' Meeting of the Working Group on Transparency and Reporting, 28 February 2025. <https://bit.ly/4kNRIO6>.

With a quarter of total initial report submissions only available to the ATT Secretariat and ATT States Parties, it is difficult for other ATT stakeholders to evaluate national control systems, tailor support and assistance approaches, or holistically assess the standing and impact of Treaty implementation. To support fulfillment of the ATT's object and purpose, States Parties that previously submitted confidential initial reports should update their reports and re-submit them publicly, and States Parties that have yet to report should be encouraged to do so publicly.

CONCLUSION

Over the past year, there have been some positive developments with regards to ATT annual reporting. Many States submitted overdue reports, including some States which submitted multiple overdue reports and are now in full compliance with their annual reporting obligations. Most on-time reports used a version of the recommended template, which greatly facilitates cross-State analysis and aids the global community in gaining a more complete understanding of the global arms trade. Yet this year has also faced challenges to Treaty transparency: the list of non-reporting States Parties that have not fulfilled their annual reporting obligations remains relatively stagnant and new ATT

States Parties continue to struggle with reporting. In addition, lingering confusion on ATT reporting practices such as 'nil' reporting, authorized vs. actual transfers, and national categories and definitions demonstrates a need for further outreach and (re-)training.

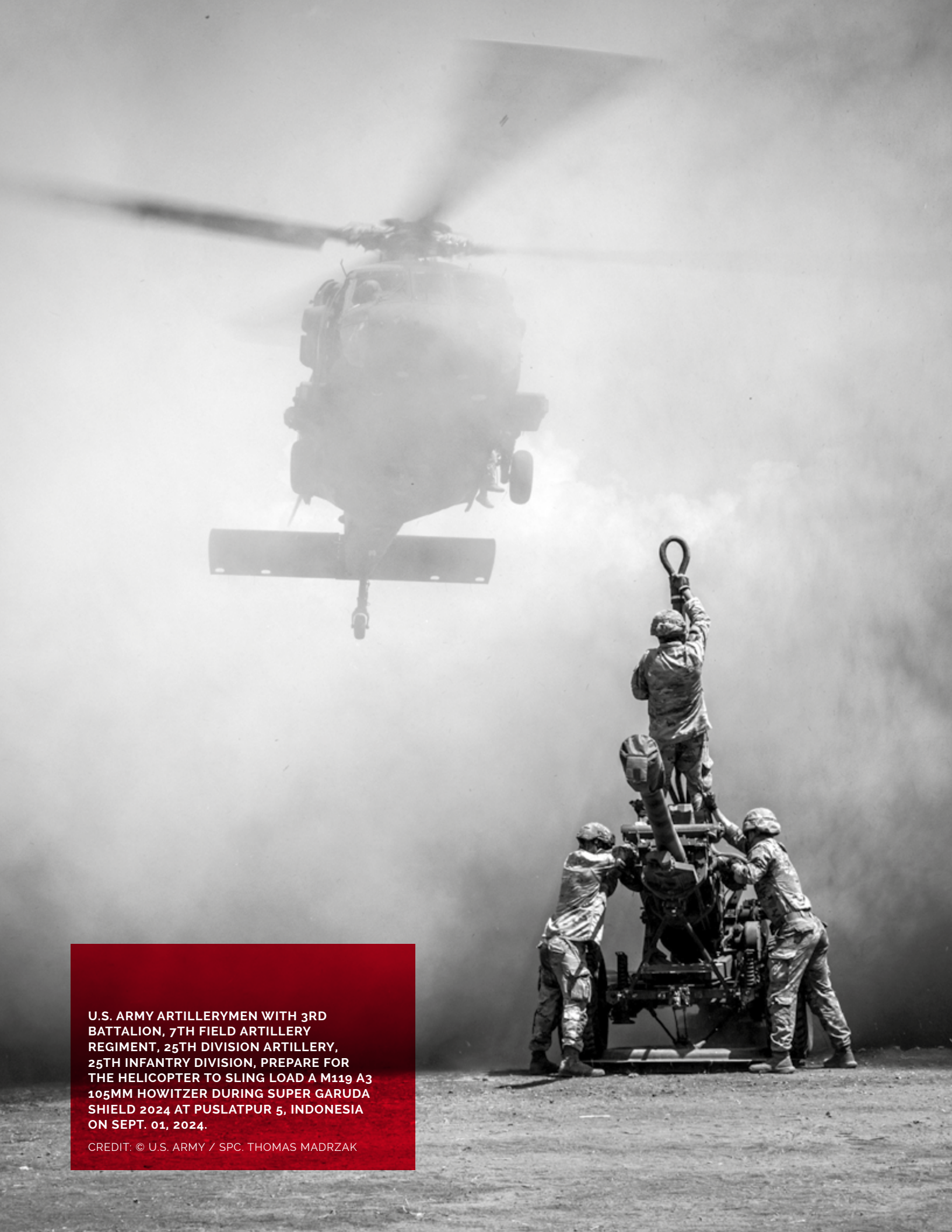
With regards to initial reporting, the total number of submissions increased in the past year and the overall compliance rate continues to see a modest but positive upward trend. However, yearly submission rates remain low, almost 20 per cent of States Parties due to submit an initial report have yet to do so, and the majority of these non-reporters are many years past their reporting deadline. Further, the fact that only six States Parties have ever submitted updates of their initial reports, despite clear evidence that many more States have updated their national systems, demonstrates that States are not prioritizing fulfilling their initial reporting obligations.

Reporting remains a touchstone of the ATT's momentum and relevance. States Parties, the Secretariat, and other stakeholders must continue to champion ATT reporting and provide targeted outreach and support to those that require assistance.



PARATROOPERS ASSIGNED TO 1ST SQUADRON, 91ST CAVALRY REGIMENT, 173RD AIRBORNE BRIGADE, FIRE A 120MM MORTAR DURING A LIVE-FIRE EXERCISE AT THE 7TH ARMY TRAINING COMMAND'S GRAFENWOEHR TRAINING AREA, GERMANY, JAN. 22, 2025.

CREDIT: © U.S. ARMY / MARKUS RAUCHENBERGER



U.S. ARMY ARTILLERYMEN WITH 3RD BATTALION, 7TH FIELD ARTILLERY REGIMENT, 25TH DIVISION ARTILLERY, 25TH INFANTRY DIVISION, PREPARE FOR THE HELICOPTER TO SLING LOAD A M119 A3 105MM HOWITZER DURING SUPER GARUDA SHIELD 2024 AT PUSLATPUR 5, INDONESIA ON SEPT. 01, 2024.

CREDIT: © U.S. ARMY / SPC. THOMAS MADRZAK