

Arms Trade Treaty

Baseline Assessment Project



Reporting During a Pandemic: Reflections on the Arms Trade Treaty 2019 Annual Reports

OCTOBER 2020

The Arms Trade Treaty-Baseline Assessment Project (ATT-BAP)

aims to assist States in understanding the obligations of the ATT and to promote effective implementation. ATT-BAP supports efforts to assist States in implementing the treaty and to ensure that reporting on the ATT is comprehensive and robust. ATT-BAP has developed tools to help provide a baseline for assessing State progress in implementing the ATT and to enable measurement of the treaty's impact and long-term effectiveness. These tools are also utilized for identifying State capacity and resource needs, including the identification of critical gaps and available resources to implement the ATT. The tools include a Ratification Checklist, the ATT-BAP Baseline Assessment Survey, and the ATT-BAP website, which includes country profiles, a national transfer control database, guidance for completing initial and annual reports, and numerous analytical reports.

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INTRODUCTION

The Arms Trade Treaty (ATT) is the only legally binding instrument to regulate the global arms trade. At its core, the ATT aims to promote transparency in the arms trade in order to build confidence amongst States Parties. One way that the treaty advances this objective is its requirement for States Parties to annually report on their arms exports and imports.

This report examines the 2019 ATT annual reports submitted to the ATT Secretariat by 5 October 2020, and highlights information provided by ATT States Parties on their arms exports and imports that occurred during the 2019 calendar year. In analyzing the 2019 ATT annual reports, this report reflects on the fifth year of reporting on annual arms exports and imports to the ATT, highlights emerging trends in reporting practices, and identifies certain challenges to transparency.

Article 13 - Reporting

1. Each State Party shall, within the first year after entry into force of this Treaty for that State Party, in accordance with Article 22, provide an initial report to the Secretariat of measures undertaken in order to implement this Treaty, including national laws, national control lists and other regulations and administrative measures. Each State Party shall report to the Secretariat on any new measures undertaken in order to implement this Treaty, when appropriate. Reports shall be made available, and distributed to States Parties by the Secretariat.
2. States Parties are encouraged to report to other States Parties, through the Secretariat, information on measures taken that have been proven effective in addressing the diversion of transferred conventional arms covered under Article 2 (1).
3. 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 report submitted to the Secretariat may contain the same information submitted by the State Party to relevant United Nations frameworks, including the United Nations Register of Conventional Arms. Reports may exclude commercially sensitive or national security information.

METHODOLOGY

Information analyzed throughout this report is derived from the 53 annual reports provided on the ATT Secretariat's website as of 5 October 2020. Comparative information on ATT States Parties' 2019 arms exports and imports is also derived from submissions to the UN Register of Conventional Arms (UNROCA) for calendar year 2019 imports and exports. Additionally, this report includes information provided by the ATT Secretariat to help clarify States Parties' submissions and offer insights on reporting obligations and compliance.

This report is divided into four sections. Section one reviews the status of reporting for the 2019 ATT annual reports and provides a comparison with previous years. Section two examines reporting practices and highlights trends in how States Parties are reporting on their arms exports and imports. Section three compares the 2019 ATT annual reports with reports submitted to UNROCA and identifies broader transparency trends and challenges. The report concludes with some preliminary observations on trends in reporting over the last five years and offers insights for improving ATT annual reports to advance the promise of the ATT in increasing transparency in the arms trade.

PHOTO: FLICKR/U.S. AIR FORCE

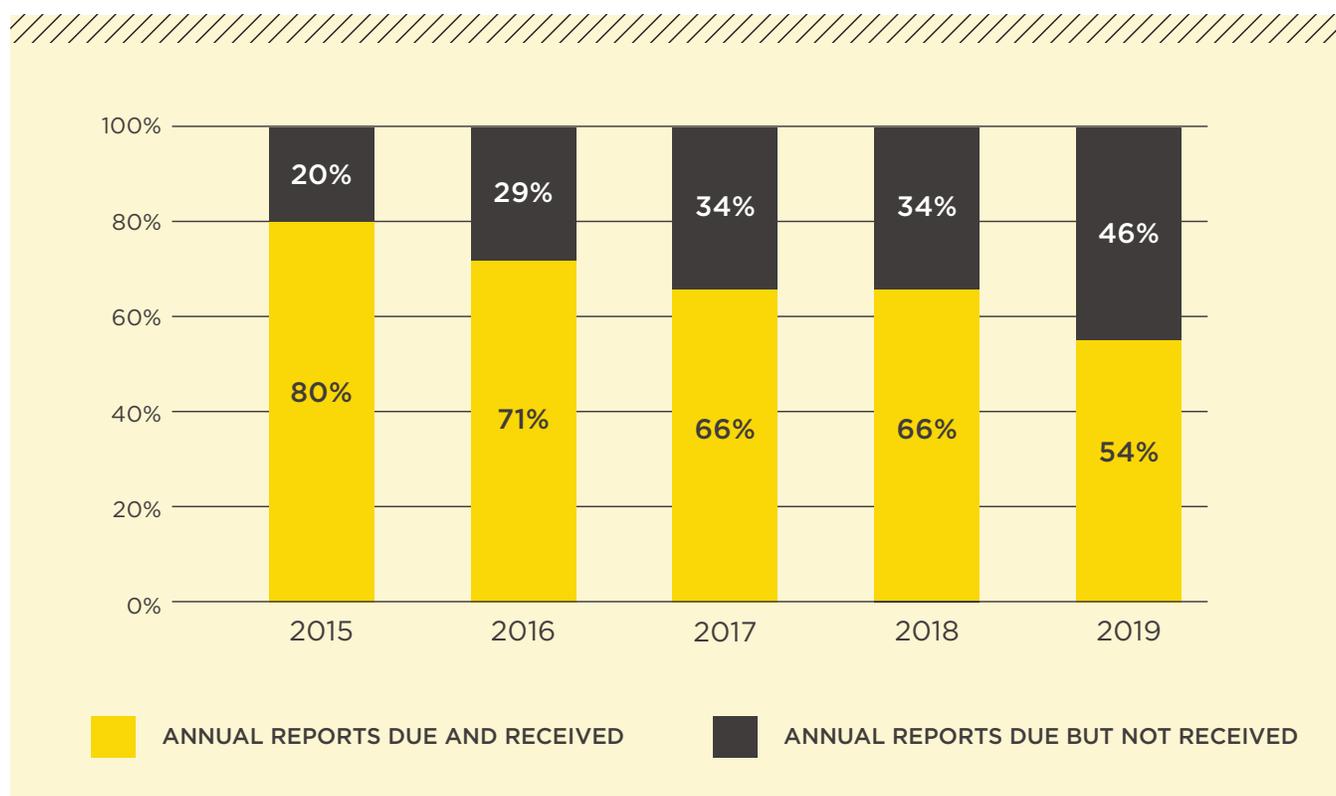


STATUS OF REPORTING

Each year, ATT States Parties are required to submit a report to the ATT Secretariat on their arms exports and imports that occurred during the previous calendar year. These reports, referred to as the ATT annual reports, are due by 31 May of each year, although the ATT Secretariat extends a seven-day grace period to States Parties that creates a de facto reporting deadline of 7 June.

Of the 110 States Parties to the ATT as of 5 October 2020, 97 States Parties were required to submit a 2019 ATT annual report on arms exports and imports.¹ At the time of writing, 52 of those 97 States Parties had done so, representing a reporting compliance rate of approximately 54 percent. An additional State Party, Maldives, also submitted a 2019 ATT annual report though it was not required to do so, bringing the total number of submitted reports to 53 and the overall reporting rate to approximately 55 percent. This represents the lowest compliance rate of any year thus far. At the equivalent time in 2019, 62 percent of States Parties that were required to complete their annual report on their 2018 arms exports and imports had done so. However, overall compliance rates for 2019 ATT annual reports are still in flux due to understandable delays wrought by the global COVID-19 pandemic. More States Parties are likely to submit their reports in the coming months and even throughout the next year (as they have done in the past), due to this delay. Therefore, readers should take into consideration the fact that this analysis only covers 2019 ATT annual reports submitted within the first nine months of 2020 when conducting yearly compliance rate comparisons.

Figure 1: Yearly Reporting Rates (Overall)

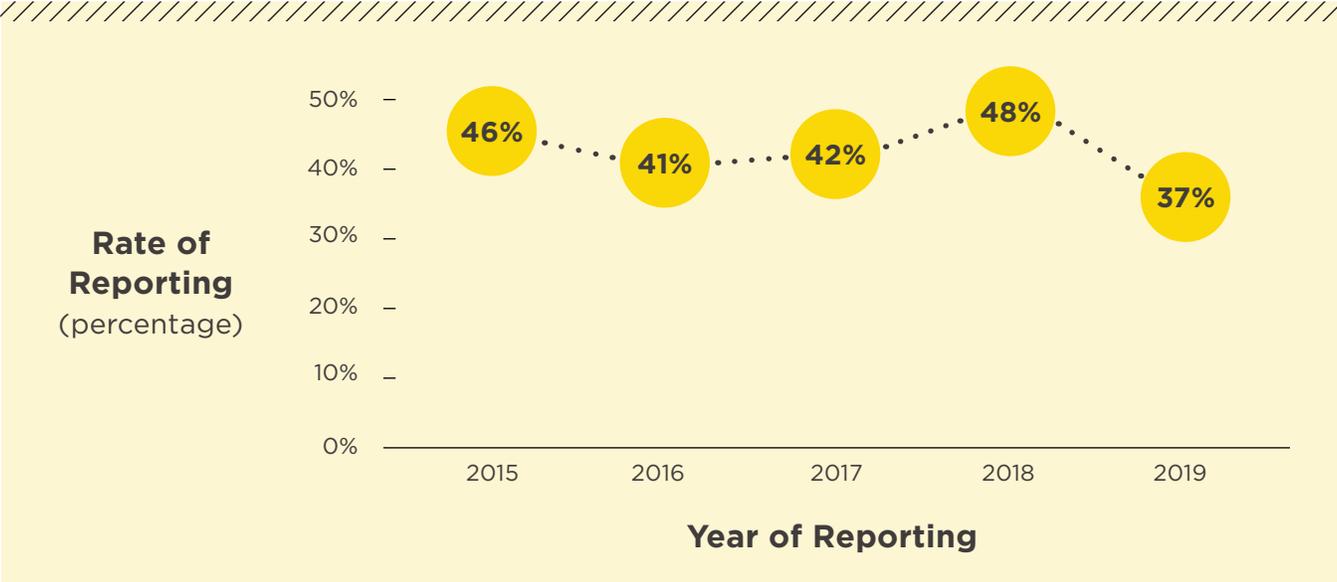


Source: Arms Trade Treaty Secretariat, “Annual Reports,” Last Modified 2 October 2020

¹ States Parties are only required to submit their first ATT annual report following the first full year of treaty implementation for that State Party.

Thirty-Six of the 53 reporting States Parties submitted their 2019 ATT annual reports on time by the 7 June deadline, representing an on-time compliance rate of 37 percent.² This compares to an on-time rate of 48 percent in 2019. While on-time reporting rates have varied each year since States Parties were first required to submit ATT annual reports in 2016, reflecting arms exports and imports that occurred in the 2015 calendar year, this represents the lowest rate of on-time reporting compliance of any year. As mentioned above, on-time reporting rates could be lower this year because of challenges faced by governments due to the global COVID-19 pandemic. The 31 May due date was still early in national experiences with COVID and many governments were faced with remote work, an inability to access information and data, and competing priorities amidst a health crisis. Only time will tell if this year's reporting trends represent a one-year aberration or if low reporting rates become commonplace within the context of the ATT.

Figure 2: Yearly On-Time Reporting Rates³



Each year, new States Parties become required to submit their annual reports. In 2019, five States Parties - Brazil, Cameroon, Chile, Kazakhstan, and the State of Palestine - were due to submit their first ATT annual reports by 31 May 2020. As of 5 October 2020, three of these five States Parties - Chile, Kazakhstan, and the State of Palestine - had submitted their first ATT annual reports, capturing information on arms exports and imports that occurred during the 2019 calendar year. Of note, Chile had also previously submitted an annual report for its 2018 arms exports and imports despite not being required to do so at the time. An additional State Party, Maldives, submitted an ATT annual report for the first time this year, although it was not required to do so.

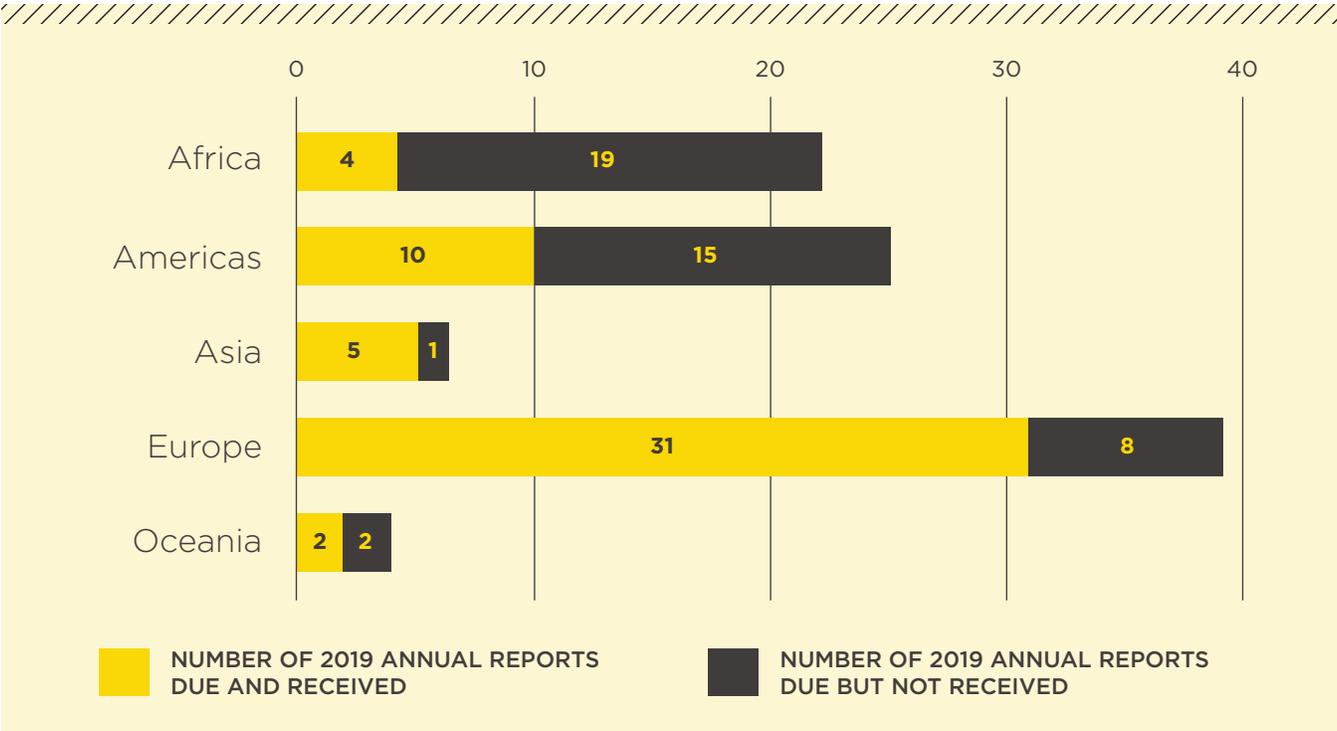
² Maldives is included in the count of on-time reporting, despite not being required to submit a 2019 ATT annual report. The 36 States Parties that submitted their 2019 ATT annual reports on time are: Albania, Argentina, Belgium, Benin, Burkina Faso, Chile, the Czech Republic, the Dominican Republic, Finland, France, Georgia, Germany, Italy, Jamaica, Japan, Latvia, Liechtenstein, Lithuania, Maldives, Mauritius, Mexico, New Zealand, Norway, Panama, Portugal, the Republic of Korea, the Republic of Moldova, Romania, Sierra Leone, Slovakia, Slovenia, Spain, the State of Palestine, Sweden, Switzerland, and Uruguay.

³ Percentages in all charts and tables throughout this report are rounded to the nearest whole number.

Seventeen States Parties that have previous experience completing and submitting an ATT annual report – having submitted at least one report over the last four years – have not yet submitted a 2019 ATT annual report.⁴ Among these 17 States Parties are those that have submitted an ATT annual report each year they were required to do so (11 States Parties) as well as those that have more varied reporting patterns (6 States Parties).⁵ As with the on-time reporting compliance rate, there are likely several explanations for variations in reporting behaviors this year, including, perhaps most significantly, the unprecedented challenge and strain that the COVID-19 pandemic has placed on countries around the world.

Twenty-Six States Parties have never submitted an ATT annual report on arms exports and imports to the treaty Secretariat, despite being required to do so. Of these States Parties, 12 are from Africa, 12 are from the Americas, and 2 are from Europe.⁶ Furthermore, 8 of these States Parties are among the least developed countries and 11 represent small island developing States.⁷

Figure 3: Status of Regional Reporting⁸



⁴ The 17 States Parties that have previous ATT annual reporting experience but have yet to submit their 2019 annual reports are: Bosnia and Herzegovina, Bulgaria, Burkina Faso, Costa Rica, Croatia, Cyprus, Estonia, Honduras, Liberia, Madagascar, Mali, Montenegro, Nigeria, Republic of North Macedonia, Samoa, South Africa, and Tuvalu.

⁵ Specifically, 11 States Parties have otherwise never failed to submit an ATT annual report when they were required to do so: Bosnia and Herzegovina, Bulgaria, Costa Rica, Cyprus, Estonia, Honduras, Madagascar, Montenegro, Republic of North Macedonia, Samoa, and South Africa. Four States Parties have failed to submit one previously required ATT annual report, in addition to their 2019 ATT annual reports: Burkina Faso, Croatia, Liberia, and Tuvalu. Two States Parties have failed to submit three previously required ATT annual reports, in addition to their 2019 ATT annual reports: Mali and Nigeria.

⁶ The 12 States Parties from Africa are: Cabo Verde, Central African Republic, Chad, Côte d'Ivoire, Ghana, Guinea, Lesotho, Mauritania, Niger, Seychelles, Togo, and Zambia. The 12 States Parties from the Americas are: Antigua and Barbuda, Bahamas, Barbados, Belize, Dominica, Grenada, Guatemala, Guyana, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, and Trinidad and Tobago. The two States Parties from Europe are Iceland and San Marino.

⁷ The eight least developed countries are: Central African Republic, Chad, Guinea, Lesotho, Mauritania, Niger, Togo, and Zambia. The 11 small island developing States are: Bahamas, Barbados, Belize, Cabo Verde, Dominica, Guyana, Saint Kitts and Nevis, Saint Lucia, Saint Vincent and the Grenadines, Trinidad and Tobago, and Seychelles. For more information on country groupings, see: United Nations, Department of Economic and Social Affairs, Statistics Division, "Methodology," <https://unstats.un.org/unsd/methodology/m49/>.

⁸ Six States Parties from Asia were due to submit a 2019 ATT annual report: Cyprus, Georgia, Japan, Kazakhstan, the Republic of Korea, and the State of Palestine. Five of these six States Parties submitted their 2019 ATT annual reports. An additional State Party from Asia, Maldives, also submitted a 2019 ATT annual report despite not being required to do so, bringing the total number of States Parties from Asia that submitted 2019 ATT annual reports to six.

Figure 4: ATT Annual Reporting Practices

ATT State Party	2015 Annual Report	2016 Annual Report	2017 Annual Report	2018 Annual Report	2019 Annual Report
Afghanistan	--	--	--	--	--
Albania	✓	✓	✓	✓	🔒
Antigua and Barbuda	⊗	⊗	⊗	⊗	⊗
Argentina	✓	✓	🔒	✓	✓
Australia	✓	✓	✓	✓	✓
Austria	✓	✓	✓	✓	✓
Bahamas	⊗	⊗	⊗	⊗	⊗
Barbados	--	⊗	⊗	⊗	⊗
Belgium	✓	✓	✓	✓	✓
Belize	--	⊗	⊗	⊗	⊗
Benin	--	--	--	✓	✓
Bosnia and Herzegovina	✓	✓	✓	✓	⊗
Botswana	--	--	--	--	--
Brazil	--	--	--	--	⊗
Bulgaria	✓	✓	✓	✓	⊗
Burkina Faso	✓	✓	✓	⊗	⊗
Cabo Verde	--	--	⊗	⊗	⊗
Cameroon	--	--	--	--	⊗
Canada	--	--	--	--	--
Central African Republic	--	--	⊗	⊗	⊗
Chad	--	⊗	⊗	⊗	⊗
Chile	--	--	--	✓*	✓
China	--	--	--	--	--
Costa Rica	✓	✓	✓	✓	⊗
Côte d'Ivoire	--	⊗	⊗	⊗	⊗
Croatia	✓	✓	✓	⊗	⊗
Cyprus	--	--	🔒	🔒	⊗
Czech Republic	✓	✓	✓	✓	✓
Denmark	✓	✓	✓	✓	✓
Dominica	--	⊗	⊗	⊗	⊗
Dominican Republic	✓	✓	✓	✓	✓
El Salvador	✓	✓	✓	⊗	✓
Estonia	✓	✓	✓	✓	⊗
Finland	✓	✓	✓	✓	✓
France	✓	✓	✓	✓	✓
Georgia	--	--	✓	🔒	🔒
Germany	✓	✓	✓	✓	✓
Ghana	--	--	⊗	⊗	⊗
Greece	--	✓*	🔒	🔒	🔒

ATT State Party	2015 Annual Report	2016 Annual Report	2017 Annual Report	2018 Annual Report	2019 Annual Report
Grenada	⊗	⊗	⊗	⊗	⊗
Guatemala	--	--	⊗	⊗	⊗
Guinea	⊗	⊗	⊗	⊗	⊗
Guinea Bissau	--	--	--	--	--
Guyana	⊗	⊗	⊗	⊗	⊗
Honduras	--	--	--	🔒	⊗
Hungary	✓	✓	✓	✓	🔒
Iceland	⊗	⊗	⊗	⊗	⊗
Ireland	✓	✓	✓	✓	✓
Italy	✓	✓	✓	✓	✓
Jamaica	✓	✓	✓	✓	✓
Japan	✓	✓	✓	✓	✓
Kazakhstan	--	--	--	--	🔒
Latvia	✓	✓	✓	✓	✓
Lebanon	--	--	--	--	--
Lesotho	--	--	⊗	⊗	⊗
Liberia	✓*	🔒	⊗	🔒	⊗
Liechtenstein	✓	✓	✓	✓	✓
Lithuania	✓	✓	✓	🔒	🔒
Luxembourg	✓	✓	✓	✓	✓
Madagascar	--	--	🔒	🔒	⊗
Maldives	--	--	--	--	🔒*
Mali	✓	⊗	⊗	⊗	⊗
Malta	⊗	⊗	✓	⊗	🔒
Mauritania	--	⊗	⊗	⊗	⊗
Mauritius	--	✓	✓	🔒	🔒
Mexico	✓	✓	✓	✓	✓
Monaco	--	--	✓	✓	✓
Montenegro	✓	✓	✓	✓	⊗
Mozambique	--	--	--	--	--
Namibia	--	--	--	--	--
Netherlands	✓	✓	✓	✓	✓
New Zealand	✓	✓	✓	✓	✓
Niger	--	⊗	⊗	⊗	⊗
Nigeria	⊗	⊗	⊗	🔒	⊗
Niue	--	--	--	--	--
Norway	✓	✓	✓	✓	✓
Palau	--	--	--	--	--
Panama	✓	🔒	✓	✓	✓
Paraguay	✓*	✓	⊗	✓	✓
Peru	--	--	✓	✓	✓

ATT State Party	2015 Annual Report	2016 Annual Report	2017 Annual Report	2018 Annual Report	2019 Annual Report
Poland	✓	✓	✓	✓	✓
Portugal	✓	✓	✓	✓	✓
Republic of Korea	--	--	--	✓	✓
Republic of Moldova	--	✓	✓	✓	✓
Republic of North Macedonia	✓	✓	✓	✓	⊗
Romania	✓	✓	✓	✓	✓
Saint Kitts and Nevis	⊗	⊗	⊗	⊗	⊗
Saint Lucia	⊗	⊗	⊗	⊗	⊗
Saint Vincent and the Grenadines	⊗	⊗	⊗	⊗	⊗
Samoa	✓	✓	✓	✓	⊗
San Marino	--	⊗	⊗	⊗	⊗
Sao Tome and Principe	--	--	--	--	--
Senegal	✓	🔒	✓	🔒	🔒
Serbia	✓	✓	✓	✓	✓
Seychelles	--	--	⊗	⊗	⊗
Sierra Leone	✓	✓	✓	✓	✓
Slovakia	🔒	✓	✓	✓	✓
Slovenia	✓	✓	✓	✓	✓
South Africa	✓	✓	✓	✓	⊗
Spain	✓	✓	✓	✓	✓
State of Palestine	--	--	--	--	🔒
Suriname	--	--	--	--	--
Sweden	✓	✓	✓	✓	✓
Switzerland	✓*	✓	✓	✓	✓
Togo	--	--	⊗	⊗	⊗
Trinidad and Tobago	⊗	⊗	⊗	⊗	⊗
Tuvalu	--	⊗	✓	✓	⊗
United Kingdom	✓	✓	✓	✓	✓
Uruguay	✓	✓	✓	✓	✓
Zambia	--	--	⊗	⊗	⊗

TABLE KEY

- ✓ Submitted a public report
 - 🔒 Submitted a private report
 - ⊗ Report due but not submitted
 - * Submitted a report but was not required to do so for that year
 - No report due
- States Parties that are not yet required to submit an ATT annual report
- States Parties that have never submitted an ATT annual report despite being required to do so

REPORTING PRACTICES AND TRENDS

PUBLIC VS. PRIVATE REPORTS

Of the 53 States Parties that submitted their 2019 ATT annual reports, 11 submitted private reports, thereby making their reports only available to other ATT States Parties. The 11 States Parties that submitted private reports are: Albania, Georgia, Greece, Hungary, Kazakhstan, Lithuania, Maldives, Malta, Mauritius, Senegal, and the State of Palestine. This represents approximately 21 percent of all reports submitted for 2019, and a continued increasing trend over the last five years. For comparison, just 2 percent of reports submitted for the first year of reporting, reflecting arms exports and imports that occurred during the 2015 calendar year, were private. Unfortunately, the percentage of annual reports submitted privately has increased every year since. This year's record-high private reporting rate reflects a continuation of a negative trend in transparency in the ATT annual reports. It is worth noting that all three States Parties that submitted an ATT annual report for the first time this year – Kazakhstan, Maldives, and the State of Palestine – did so privately.

Figure 5: Proportion of Private ATT Annual Reporting Over the Last Five Years

Report Year	Number of Reports Submitted Privately	Total Number of Reports Submitted	Percentage of Private Reports
2015	1	52	2%
2016	3	54	6%
2017	4	59	7%
2018	10	62	16%
2019	11	53	21%

Of the 11 States Parties that made their 2019 ATT annual reports private, 5 also submitted privately last year.⁹ While several of these 11 States Parties have previously submitted private ATT annual reports, many also have experience submitting public ATT annual reports to the treaty Secretariat. For example, 6 of these 11 States Parties initially reported publicly to the ATT Secretariat on their annual arms exports and imports, but gradually shifted to private reporting over time.¹⁰ Two States Parties – Cyprus and Madagascar – have regularly chosen to make their ATT annual reports private and three States Parties – Albania, Hungary and Malta – reported privately for the first time this year.

It remains unclear the reasons States Parties make their reports private or have chosen to switch to private reporting after reporting publicly. Anecdotally, it is understood that some States Parties are confused by the reporting template (and an effort to remedy that confusion is under discussion).¹¹ States Parties may also face changes in their security situations or choose to withhold sensitive commercial information for economic or security reasons. A change in personnel completing the report may also lead to changes in reporting practices. It would be helpful to have a more comprehensive understanding of the reasons behind private reporting, as the concerning trend of fewer publicly available reports continues to challenge the treaty's transparency objective.

⁹ The 5 States Parties that submitted private ATT annual reports for both their 2018 and 2019 arms exports and imports are: Georgia, Greece, Lithuania, Mauritius, and Senegal.

¹⁰ The 6 States Parties that have gradually shifted to private reporting are: Georgia, Greece, Liberia, Lithuania, Mauritius, and Senegal.

¹¹ For a more detailed examination of the challenges posed by the ATT reporting templates, and ongoing discussions, see: Arms Trade Treaty-Baseline Assessment Project, *The ATT Reporting Templates: Challenges and Recommendations*, January 2020, http://www.armstrade.info/wp-content/uploads/2014/10/Reporting-Templates-Challenges-and-Recommendations_Web-Version.pdf; ATT Working Group on Transparency and Reporting, "Co-Chair Report of 06 February 2020 Meeting," 3 April 2020, https://www.thearmstradetreaty.org/hyper-images/file/ATT_CSP6_WGTR_Co-chair%20Report%20of%2006%20Feb%202020%20meeting_EN/ATT_CSP6_WGTR_Co-chair%20Report%20of%2006%20Feb%202020%20meeting_EN.pdf.



PHOTO: MASTER SGT. MATT HECHT

USE OF THE REPORTING TEMPLATE

For the second year, States Parties could use the ATT Secretariat’s online tool to submit their ATT annual reports. Of the 53 States Parties that submitted 2019 ATT annual reports, 10 States Parties reported using the online tool¹² as compared to 11 States Parties that reported using the online tool for their 2018 reports, reflecting a similar rate of online tool usage as the first year the tool was available. At least seven of these 10 States Parties also used the online tool to submit their 2018 ATT annual reports.¹³ Four States Parties that used the online tool for their 2018 reports – Argentina, Luxembourg, the Netherlands, and Norway – used the standardized reporting template, rather than the online tool, for their 2019 reports. It is unclear why these States Parties chose not to use the online reporting tool for their 2019 reports. In total, 40 States Parties used the voluntary ATT reporting template that is available for download from the ATT Secretariat’s website, 10 States Parties used the online tool to submit their 2019 ATT annual reports, and three States Parties – Australia, France, and the United Kingdom – submitted their 2019 UNROCA reports, as the treaty allows.

NIL REPORTS



Nine States Parties – Benin, the Dominican Republic, El Salvador, Monaco, Panama, Paraguay, Peru, Sierra Leone, and Uruguay – submitted nil reports for arms exports, indicating that they did not export any weapons during the 2019 calendar year.

Three States Parties – Panama, Paraguay, and Sierra Leone – submitted nil reports for arms imports, indicating that they did not import any weapons during the 2019 calendar year.

Three States Parties – Panama, Paraguay, and Sierra Leone – submitted nil reports for both arms exports and imports.

Consistent with their reporting patterns from previous years, both Austria and the United Kingdom only reported on arms exports and did not submit information on their 2019 arms imports – though neither indicated they submitted a nil report for arms imports. Austria removed the import section from its report and the United Kingdom simply left the import section blank. Neither State Party offered an explanation as to why they only reported on arms exports despite the treaty requirement that States Parties report on both arms imports and exports.

¹² Nine States Parties submitted publicly available 2019 ATT annual reports using the online tool. These nine States Parties are: Belgium, Chile, Czech Republic, Finland, Italy, Japan, Romania, Sweden, and Switzerland. One additional State Party submitted its 2019 annual report using the online tool, but elected to keep its report private.

¹³ States Parties that used the online reporting tool for their 2018 and 2019 ATT annual reports are: Chile, Czech Republic, Italy, Japan, Romania, Sweden, and Switzerland.

NATIONAL SECURITY AND COMMERCIAL SENSITIVE INFORMATION

Eleven States Parties – Argentina, Australia, Chile, Finland, Ireland, Italy, Mexico, Norway, the Republic of Korea, Sweden, and Uruguay – indicated that they withheld some commercially sensitive and/or national security-related information from their 2019 ATT annual reports, in accordance with Article 13.3 of the ATT. Each of these 11 States Parties had also indicated that they withheld such information from their 2018 ATT annual reports, and 7 of these 11 States Parties also indicated that they withheld such information from previously submitted ATT annual reports (see figure 6).

The 11 States Parties that indicated they withheld some commercially sensitive and/or national security-related information in their 2019 ATT annual reports represent 21 percent of all 2019 annual reports submitted as of 5 October 2020. This is the second-highest rate of information withheld since ATT reporting began. In 2016, the first year that ATT annual reports were due, 17 percent of States Parties that reported publicly indicated that commercially sensitive and/or national security-related information was withheld. This percentage increased every year, peaking at 23 percent of 2018 annual reports. While the percentage of 2019 annual reports with information withheld is, at the time of writing, lower than it was for the 2018 ATT annual reports, this percentage may increase as more reports are submitted.

Figure 6: Patterns of Withholding Some Commercially Sensitive and/or National Security-Related Information

State Party	Reporting Year				
	2015	2016	2017	2018	2019
Argentina				✓	✓
Australia	✓			✓	✓
Chile				✓	✓
Finland		✓	✓	✓	✓
Ireland		✓		✓	✓
Italy		✓	✓	✓	✓
Mexico				✓	✓
Norway		✓	✓	✓	✓
Republic of Korea				✓	✓
Sweden	✓	✓	✓	✓	✓
Uruguay ¹⁴		✓	✓	✓	✓

Chile, the Republic of Korea, and Sweden represent the only three States Parties thus far that have indicated in all of their submitted ATT annual reports that national security and/or commercially sensitive information had been withheld.

¹⁴ While Uruguay indicated in its 2016, 2017, 2018, and 2019 ATT annual reports that it withheld some commercially sensitive and/or national security-related information, Uruguay also provided conflicting information in at least two of its submitted reports, which may reflect broader reporting errors. For example, in its 2016 ATT annual report, Uruguay checked yes for each item detailed on the report cover sheet – and in its 2018 ATT annual report, Uruguay checked yes for all but one item provided on the report cover sheet – thereby providing contradictory information.

NATIONAL DEFINITIONS

Six States Parties – Belgium, Finland, New Zealand, Sweden, Switzerland, and Uruguay – indicated that they provided information on national definitions of arms covered by the annual report. By comparison, nine States Parties indicated that they provided information on national definitions in their 2018 ATT annual reports, seven States Parties indicated as such in their 2017 ATT annual reports, nine States Parties did so in their 2016 ATT annual reports, and twelve States Parties did so in their 2015 ATT annual reports.¹⁵

PHOTO: OS ERICA SEYMOUR, 4 WING IMAGING



¹⁵ Although Uruguay indicated in its 2016 annual report that it provided national definitions in its cover sheet, it did not report any arms exports or imports that year and did not provide such definitions within its report. Therefore, Uruguay was not counted in the list of countries included as providing a definition.

EXPORTS

▶ Actual and/or Authorizations for Exports

Eighteen States Parties reported on exports of major conventional weapons in their 2019 reports. Of these, 13 States Parties reported on actual exports and 4 States Parties reported on export authorizations.¹⁶ One State Party, Finland, did not indicate whether its reported exports of major conventional weapons were export authorizations or actual exports.

Thirty-Three States Parties reported on exports of small arms and light weapons (SALW). Of these States Parties, 19 reported on actual SALW exports and 11 reported on SALW export authorizations.¹⁷ One State Party, Austria, indicated that it reported on both actual exports of SALW and export authorizations. Two States Parties – Ireland and Norway – did not indicate whether their reported SALW exports were authorizations or actual exports.

Several States Parties demonstrated varied reporting patterns when reporting on exports of major conventional weapons systems compared to SALW. For example, two States Parties – Germany and Switzerland – reported actual exports for the first seven categories of weapons covered by the ATT and reported export authorizations for SALW. One State Party – Austria – reported actual exports for major conventional weapons and marked both authorizations and actual exports for SALW.¹⁸ Other States Parties were less clear in their reporting on SALW exports. Two States Parties – Finland and Poland – did not indicate whether certain SALW exports were actual exports or authorizations, despite indicating as much for the majority of their reported SALW exports.

▶ Number of Items Exported and/or Value of Exports

Twenty-Four States Parties reported the number of items exported and eight States Parties reported on both the number and value of items exported, though to varying extents.¹⁹ For example, Australia reported the number of items exported for major conventional weapons as well as SALW, while also providing an aggregated value of all of its 2019 SALW exports. In the majority of its report, Ireland reported both the number and the value of exports. However, on two occasions, Ireland only reported the number of items exported to EU Member States in aggregate. Sweden indicated that the number of certain exports was “classified.” It did, however, provide the number of SALW exports that fell under voluntary national categories in a separate document attached to its 2019 ATT annual report.

While there was some variation in how and where States Parties reported both the number and value of items exported, only one State Party – Belgium – reported solely on the value of items exported.

¹⁶ The 13 States Parties that reported actual exports of major conventional weapons are: Austria, Czech Republic, France, Germany, the Netherlands, Norway, Poland, Romania, Serbia, Slovakia, Spain, Sweden, and Switzerland. The four States Parties that reported export authorizations of major conventional weapons are: Australia, Italy, the Republic of Korea, and the United Kingdom.

¹⁷ The 19 States Parties that reported actual exports of SALW are: Argentina, Chile, Czech Republic, Finland, France, Japan, Latvia, Liechtenstein, Luxembourg, Mexico, the Netherlands, Poland, the Republic of Moldova, Romania, Serbia, Slovakia, Slovenia, Spain, and Sweden. The 11 States Parties that reported export authorizations of SALW are: Australia, Belgium, Denmark, Germany, Italy, Jamaica, New Zealand, Portugal, the Republic of Korea, Switzerland, and the United Kingdom.

¹⁸ Austria reported its SALW exports in aggregate, refraining from providing details on the categories or specific types of SALW it exported, and providing export authorizations for aggregated SALW and actual exports for aggregated small arms and aggregated light weapons.

¹⁹ The 24 States Parties that reported the number of items exported are: Argentina, Chile, Czech Republic, Denmark, Finland, France, Germany, Italy, Jamaica, Liechtenstein, Luxembourg, Mexico, the Netherlands, New Zealand, Norway, Poland, Portugal, the Republic of Korea, Romania, Serbia, Slovakia, Spain, Switzerland, and the United Kingdom. The eight States Parties that reported on both the number and value of items exported, to varying degrees, are: Australia, Austria, Ireland, Japan, Latvia, the Republic of Moldova, Slovenia, and Sweden.

Figure 7: Australia reported the number of items exported while also providing an aggregated value of its 2019 SALW exports

Aggregated Small Arms and Light Weapons Exports and Imports 2019

Exports: Total permits issued: 164 Total number of items: 7496 Total value: \$3,390,255 Imports: Handguns Rifles Shotguns Military* Air Firearms Total 6942 57724 181 4969 9157 96964 Figures do not include imitation firearm and paintball markers. Figures include blank firing firearms. *Military firearms may include large calibre anti-materiel weapons

Small arms exports

Category	Trading partner	Number of items	State of origin (if not exporter)	Intermediate location(s)	Description of items	Comments on the transfer
6. Others	Austria	52	None			1 permit granted
6. Others	Belarus	30	None			1 permit granted
6. Others	Brazil	18	None			1 permit granted
6. Others	Canada	4	None			3 permits granted
6. Others	China	314	None			4 permits granted
6. Others	Cyprus	34	None			2 permits granted
6. Others	Fiji	1	None			1 permit granted
6. Others	France	21	None			3 permits granted

Figure 8: Ireland reported the number of items exported to EU Member States in aggregate

Category of arms ⁴ [I-VIII]		Authorised or actual exports ⁵		Extent of exports ⁶ (choose one or both)		Final importing State ⁹	State of origin (if not exporter) ¹⁰	Remarks ¹¹	
		Auth.	Act.	Number of items ⁷	Value ⁸			Description of Item	Comments on the transfer
1		2	3	4	5	6	7	8	9
B. VIII. Small Arms and Light Weapons^{14, 15}									
Small Arms (aggregated)¹⁶		<input type="checkbox"/>	<input type="checkbox"/>						
1.	Revolvers and self-loading pistols	<input type="checkbox"/>	<input type="checkbox"/>	44	N/A	United Kingdom			
2.	Rifles and carbines	<input type="checkbox"/>	<input type="checkbox"/>	959	€102,017	Australia		Bolt-Action Rifles	For resale to licensed shooters/dealers
				76	€9,887	New Zealand		Bolt-Action Rifles	For resale to licensed shooters/dealers
				1	€50	Canada		.22 Calibre BRNO Sporting Rifle	Personal/Sporting
				63		EU Member States: Belgium, Germany, Poland, Portugal, UK			
3.	Sub-machine guns	<input type="checkbox"/>	<input type="checkbox"/>	Nil					
4.	Assault rifles	<input type="checkbox"/>	<input type="checkbox"/>	Nil					



PHOTO: FLICKR/7TH ARMY TRAINING COMMAND

► Information on Importing State

Seventeen of the eighteen States Parties that reported on exports of major conventional weapons provided information on the importing State(s). As in previous years, Italy was the only State Party that reported exports of major conventional weapons without indicating the importing State(s) for any such transfers. This stands in contrast to Italy's reporting on its 2019 SALW exports, in which it did provide information on the importing State(s) - though Italy did not specify the types of SALW exported to each State. Indeed, all 33 States Parties that reported on exports of SALW provided information on the importing State for each transfer. It should be noted, however, that Denmark - while among the 33 States Parties that did provide at least some information on importing State(s) - omitted importing State information from three out of the four categories of SALW exports it reported. Additionally, two States Parties, Jamaica and Luxembourg, aggregated the final importing States for certain SALW exports, thereby limiting understandings and assessments of how many items were authorized for export to a given State and thereby challenging evaluations of compliance with Articles 6 and 7 of the ATT.

► Origin of Conventional Arms, If Not Exporting State

Two States Parties - the Netherlands and Serbia - indicated a State of origin other than the exporting State for certain major conventional weapons exports that occurred in the 2019 calendar year. By comparison, five States Parties provided such information in their 2018 ATT annual reports, six States Parties did so in their 2017 ATT annual reports, seven States Parties indicated a State of origin other than the exporting State for certain transfers in their 2016 ATT annual reports, and six States Parties did so in their 2015 ATT annual reports.

Six States Parties – Latvia, Luxembourg, the Netherlands, Romania, Serbia, and Slovenia – indicated a State of origin other than the exporting State for certain SALW exports that occurred in the 2019 calendar year, compared to nine States Parties that reported such information in their 2018 ATT annual reports, nine States Parties that did so in their 2017 ATT annual reports, six States Parties that indicated a State of origin for certain transfers in their 2016 ATT annual reports, and five States Parties that did so in their reports on transfers conducted in 2015.

► Description of Conventional Arms

Thirteen States Parties provided a description of at least some of their reported major conventional weapons exports in their 2019 ATT annual reports, representing 72 percent of States Parties that reported on exports of major conventional weapons.²⁰ By comparison, 75 percent of States Parties that reported exports of major conventional weapons in their 2018 ATT annual reports provided descriptions of items, whereas 67 percent did so in their 2017 ATT annual reports, 70 percent of States Parties provided such information in their 2016 reports, and 74 percent of States Parties did so in their 2015 reports.

Sixteen States Parties provided a description of at least some of their SALW exports that occurred during the 2019 calendar year, representing 48 percent of States Parties that reported on SALW exports.²¹ By comparison, 54 percent of States Parties that reported on SALW exports in their 2018 ATT annual reports provided a description of at least some of the items exported, 52 percent of States Parties did so in their 2017 ATT annual reports, 50 percent of States Parties provided such information in their 2016 ATT annual reports, and 51 percent of States Parties did so in their 2015 ATT annual reports. As in previous years, States Parties often provided information on the type of weapon system exported and detailed technical specifications for the system.

Figure 9: Annual Proportion of States Parties that Reported Exports of Major Conventional Weapons and SALW and Provided Descriptions of Items

Year of ATT Annual Report	Percent of States Parties that Provided Descriptions for their Reported Major Conventional Weapons Exports	Percent of States Parties that Provided Descriptions for their Reported SALW Exports
2015	74%	51%
2016	70%	50%
2017	67%	52%
2018	75%	54%
2019	72%	48%

²⁰ The 13 States Parties that provided a description of at least some of their reported exports of major conventional weapons are: Australia, Finland, France, Germany, the Netherlands, Poland, the Republic of Korea, Romania, Serbia, Slovakia, Sweden, Switzerland, and the United Kingdom.

²¹ The 16 States Parties that provided a description of at least some of their reported exports of SALW are: Argentina, Chile, Denmark, Finland, France, Ireland, Liechtenstein, Luxembourg, Mexico, the Netherlands, the Republic of Korea, Romania, Slovakia, Slovenia, Sweden, and the United Kingdom.

► Comments on Transfer

Seven States Parties provided “comments on transfer” for at least some of their exports of major conventional weapons systems that occurred in the 2019 calendar year.²² Thirteen States Parties provided “comments on transfer” for at least some of their 2019 SALW exports.²³

Figure 10: Mexico provided comments on its SALW exports, indicating intended use

Categoría de armas ⁴ [I-VIII]	Exportaciones autorizadas o reales ⁵		Alcance de las exportaciones ⁶ (elija una o ambas opciones)		Estado importador final ⁹	Estado de origen (si no es el exportador) ¹⁰	Observaciones ¹¹	
	Aut.	Reales	Número de artículos ⁷	Valor ⁸			Descripción del artículo	Comentarios sobre la transferencia
1	2	3	4	5	6	7	8	9
B. VIII. Armas pequeñas y armas ligeras^{14, 15}								
Armas pequeñas (total)¹⁶		<input type="checkbox"/>	<input checked="" type="checkbox"/>	1,250				
1.	Revólveres y pistolas automáticas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	25		GUATEMALA	PISTOLA MARCA MENDOZA, CAL. .380".	USO DEPORTIVO
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	25		GUATEMALA	PISTOLA MARCA MENDOZA, CAL. .380".	USO DEPORTIVO
2.	Fusiles y carabinas	<input type="checkbox"/>	<input checked="" type="checkbox"/>	200		EI SALVADOR	RIFLE MARCA MENDOZA, CAL. 22 L.R.	USO DEPORTIVO
		<input type="checkbox"/>	<input checked="" type="checkbox"/>	1000		GUATEMALA	RIFLE MARCA MENDOZA, CAL. 22 L.R.	USO DEPORTIVO

The rate of reporting “comments on transfer” has varied over the last five years for those States Parties that reported on major conventional arms exports and States Parties that reported on SALW exports. As the table below shows, the percentage of States Parties that reported on major conventional weapons exports and provided comments on those reported exports has fluctuated between 38 and 48 percent over the last five years. And the percentage of States Parties that reported on SALW exports and provided comments on those transfers has varied slightly, though has never exceeded 40 percent of reporting States Parties.

Figure 11: Annual Proportion of States Parties that Reported Exports of Major Conventional Weapons and SALW and Provided Comments on Transfer

Year of ATT Annual Report	Percent of States Parties that Provided Comments on Transfer for their Reported Major Conventional Weapons Exports	Percent of States Parties that Provided Comments on Transfer for their Reported SALW Exports
2015	48%	34%
2016	41%	34%
2017	43%	30%
2018	38%	38%
2019	39%	39%

²² The seven States Parties that included at least some comments on transfers of major conventional weapons exports are: Australia, Czech Republic, France, Poland, Slovakia, Switzerland, and the United Kingdom.

²³ The 13 States Parties that provided at least some comments on transfers of SALW exports are: Australia, Finland, Ireland, Jamaica, Liechtenstein, Luxembourg, Mexico, the Netherlands, the Republic of Moldova, Romania, Slovakia, Slovenia, and the United Kingdom.

IMPORTS

Actual and/or Authorizations for Imports

Twenty-Two States Parties reported on imports of major conventional weapons in their 2019 ATT annual reports. Of these States Parties, 15 reported on actual imports and 6 reported on authorizations.²⁴ One State Party, Denmark, reported on both actual imports of, as well as import authorizations for, major conventional weapons – reporting actual imports of armored combat vehicles, large-calibre artillery systems, and manned combat aircraft, and reporting import authorizations for unmanned combat aircraft.

Thirty-Five States Parties reported on imports of SALW. Of these States Parties, 17 reported on actual imports of SALW and 10 reported on import authorizations.²⁵ Four States Parties reported on both actual imports and authorizations.²⁶ Peru, for example, reported actual imports for small arms and import authorizations for light weapons. Two States Parties – Finland and Ireland – did not clearly indicate whether their reported 2019 SALW imports were authorizations or actual imports. It is also unclear if an additional two States Parties – Dominican Republic and Uruguay – reported actual imports or authorizations, as they marked both boxes for corresponding transfers in their reporting forms.

Figure 12: Peru reported actual imports for small arms and import authorizations for light weapons

Categoría de armas ⁴ [I-VIII]	Importaciones autorizadas o reales ⁵		Alcance de las importaciones ⁶ (elija una o ambas opciones)		Estado exportador ⁹	Estado de origen (si no es el exportador) ¹⁰	Observaciones ¹¹	
	Aut.	Reales	Número de artículos ⁷	Valor ⁸			Descripción del artículo	Comentarios sobre la transferencia
1	2	3	4	5	6	7	8	9
B. VIII. Armas pequeñas y armas ligeras^{14, 15}								
Armas pequeñas (total) ¹⁶	<input type="checkbox"/>	<input checked="" type="checkbox"/>	9,488					
Armas ligeras (total) ¹⁷	<input checked="" type="checkbox"/>	<input type="checkbox"/>	6					

As in previous years, two States Parties, Austria and the United Kingdom, did not provide any information on their major conventional weapons or SALW imports that occurred during the 2019 calendar year, although neither State Party indicated that they submitted a nil report for imports. No explanation was provided for the omission of this data, despite the treaty requirement to provide such information.

One State Party, Switzerland, reported actual imports for the first seven categories of weapons covered by the ATT and import authorizations for SALW. Another State Party, Latvia, did the opposite, reporting import authorizations for major conventional weapons and actual imports for SALW.

²⁴ The 15 States Parties that reported actual imports of major conventional weapons are: Benin, Czech Republic, Japan, Mexico, the Netherlands, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, and Switzerland. The six States Parties that reported import authorizations of major conventional weapons are: Australia, Belgium, Latvia, Monaco, Peru, and the Republic of Korea.

²⁵ The 17 States Parties that reported actual imports of SALW are: Argentina, Benin, Chile, Czech Republic, France, Japan, Latvia, Luxembourg, Mexico, the Netherlands, Norway, Poland, the Republic of Moldova, Romania, Serbia, Slovakia, and Slovenia. The 10 States Parties that reported import authorizations of SALW are: Australia, El Salvador, Germany, Italy, Jamaica, Liechtenstein, Monaco, New Zealand, the Republic of Korea, and Switzerland.

²⁶ The four States Parties that reported on both actual imports and authorizations are: Belgium, Denmark, Peru, and Portugal.

As with reporting on exports, several States Parties demonstrated varied, and at times inconsistent, reporting patterns when indicating whether a given import reflected an actual import or an authorization. For example, three States Parties – Argentina, Chile, and Poland – did not indicate whether certain SALW imports were actual imports or authorizations, despite indicating as much for the majority of their other reported SALW imports. Such variations can complicate transfer assessments in and trend analyses of the ATT annual reports. For example, while Argentina primarily indicated that it reported actual SALW imports, it did not specify whether its reported small arms imports from the United States and other undisclosed States represented actual imports or authorizations.

▶ Number of Items Imported and/or Value of Imports

Thirty States Parties reported the number of items imported and seven States Parties reported both the number and value of items imported in their 2019 ATT annual reports, to varying extents.²⁷ For example, Belgium reported both the number and value of major conventional weapons imports, while reporting the value of SALW import authorizations and the number of actual SALW imports. By comparison, Japan and Latvia reported the number of major conventional weapons imports, while for the most part they reported both the number and value for SALW imports. No State Party reported only the value of items imported. Two States Parties, Australia and Sweden, omitted the number of items for certain imports – with Australia explicitly writing “number withheld” for imports of missiles and missile launchers from the United States, and Sweden writing “classified” for imports of missiles and missile launchers from the United Kingdom. These examples illustrate the types of information that States Parties may withhold from their ATT annual reports for commercial sensitivity and/or national security-related reasons, which, while permitted by Article 13.3 of the ATT, limits the fulfillment of the treaty’s transparency objective.

PHOTO: UK MOD/CROWN COPYRIGHT 2018



²⁷ The 30 States Parties that reported the number of items imported are: Argentina, Australia, Benin, Chile, Czech Republic, Denmark, Dominican Republic, El Salvador, Finland, France, Germany, Ireland, Italy, Jamaica, Liechtenstein, Luxembourg, Mexico, Monaco, the Netherlands, New Zealand, Norway, Poland, the Republic of Korea, Romania, Serbia, Slovakia, Spain, Sweden, Switzerland, and Uruguay. The seven States Parties that reported both the number and value of items imported are: Belgium, Japan, Latvia, Peru, Portugal, the Republic of Moldova, and Slovenia.

► Information on Exporting State

Twenty of the 22 States Parties that reported imports of major conventional weapons included information on the exporting State(s). Monaco and Norway were the only two States Parties that reported imports of major conventional weapons but did not indicate the exporting State(s) for any such transfers. In its report, Monaco indicated that the exporting State(s) were “unknown.” Norway simply left those fields blank in its 2019 ATT annual report.

Thirty-One of the 35 States Parties that reported on SALW imports provided information on the exporting State(s) for each transfer. The four States Parties that did not provide any information on exporting State(s) for their SALW imports are: Australia, Finland, Italy, and Monaco. Australia reported an aggregated number of commercially imported firearms without reporting the exporting State(s), while Finland did not specify the exporting State(s) and instead marked “all” for each entry. Italy simply left the field blank.

Omitting information on exporting State(s) when reporting arms imports not only limits transparency in the global arms trade, it also complicates assessments of States Parties’ compliance with Articles 6 and 7 of the ATT by obscuring broader understandings of which States are transferring what items to various regions around the world. Another way such assessments and understandings are obscured is through the aggregation of information on exporting State(s). In their 2019 ATT annual reports, seven ATT States Parties aggregated information on the exporting State(s) for some of their reported 2019 SALW imports in particular, either in part or in full, reflecting an ongoing challenge in the ATT annual reports overall.²⁸

Figure 13: The Republic of Moldova aggregated information on the exporting States for some of its reported 2019 SALW imports.

Category of arms ⁴ [I-VIII]		Authorised or actual imports ⁵		Extent of imports ⁶ (choose one or both)		Exporting State ⁹	State of origin (if not exporter) ¹⁰	Remarks ¹¹	
		Auth.	Act.	Number of items ⁷	Value ⁸			Description of Item	Comments on the transfer
1		2	3	4	5	6	7	8	9
Small Arms (aggregated) ¹⁶		<input type="checkbox"/>	<input type="checkbox"/>						
1.	Revolvers and self-loading pistols	<input type="checkbox"/>	<input checked="" type="checkbox"/>	985 items	8,199,565.00 MDL	Austria, Czech Republic, Hungary, Italy, Slovakia, Slovenia			

► Origin of Conventional Arms, If Not Exporting State

Two States Parties – Australia and Slovenia – indicated a State of origin other than the exporting State for certain major conventional weapons imports. By comparison, three States Parties indicated such information in their 2018 ATT annual reports, six States Parties did so in their 2017 ATT annual reports, three States Parties provided such details in their 2016 ATT annual reports, and five States Parties did so in their 2015 ATT annual reports.

Five States Parties – Argentina, Latvia, Peru, Romania, and Serbia – provided information on the origin of SALW imported in 2019, if not the exporting State. By comparison, 12 States Parties provided such information in their 2018 ATT annual reports, 7 States Parties did so in their 2017 ATT annual reports, 5 States Parties provided details on the origin of imported SALW, if not the exporting State, in their 2016 ATT annual reports, and 8 States Parties did so in their 2015 ATT annual reports.

In some cases, States Parties aggregated information on the State(s) of origin for certain arms imports, as exemplified in Latvia’s and Romania’s 2019 ATT annual reports.

²⁸ The seven States Parties that aggregated information on the exporting State(s) for their reported SALW imports are: Denmark, Dominican Republic, El Salvador, Ireland, Jamaica, Luxembourg, and the Republic of Moldova.



PHOTO: FLICKR/7TH ARMY TRAINING COMMAND

► Description of Conventional Arms

Sixteen States Parties provided a description of at least some of the major conventional weapons systems imported during the 2019 calendar year, representing 73 percent of States Parties that reported imports of major conventional weapons.²⁹ By comparison, 64 percent of States Parties that reported imports of major conventional weapons in their 2018 ATT annual reports provided a description of at least some of the items imported. Sixty-Five percent of States Parties did so in their 2017 ATT annual reports, 77 percent of relevant reporting States Parties provided such information in their 2016 ATT annual reports, and 78 percent did so in their 2015 ATT annual reports. In addition, the Czech Republic provided a description of how it defined imports in its 2019 report, which included how it took into account EU Directive 2009/43/EC as part of its definition.³⁰

Twenty-Two States Parties provided a description of at least some of their SALW imports during the 2019 calendar year, representing 65 percent of States Parties that reported imports of SALW.³¹ In previous years, 64 percent of States Parties that reported SALW imports during the 2018 calendar year provided descriptions of at least some of the items imported, whereas 55 percent of comparable States Parties provided such information in their 2017 ATT annual reports, 52 percent of States Parties did so in their 2016 ATT annual reports, and 55 percent of States Parties that reported SALW imports in their 2015 ATT annual reports provided descriptions.

Figure 14: Annual Proportion of States Parties that Reported Imports of Major Conventional Weapons and SALW and Provided Descriptions of Items

Year of ATT Annual Report	Percent of States Parties that Provided Descriptions for their Reported Major Conventional Weapons Imports	Percent of States Parties that Provided Descriptions for their Reported SALW Imports
2015	78%	55%
2016	77%	52%
2017	64%	55%
2018	65%	64%
2019	73%	65%

²⁹ The 16 States Parties that provided a description of at least some of their reported imports of major conventional weapons are: Argentina, Australia, Benin, Denmark, Japan, Latvia, Mexico, the Netherlands, Peru, Portugal, the Republic of Korea, Romania, Serbia, Slovakia, Slovenia, and Sweden.

³⁰ For details on the directive, see: Directive 2009/43/EC of the European Parliament and of the Council of 6 May 2009, accessed 5 October 2020, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32009L0043>.

³¹ The 22 States Parties that provided a description of at least some of their reported imports of SALW are: Argentina, Belgium, Benin, Chile, Denmark, the Dominican Republic, Finland, France, Ireland, Latvia, Liechtenstein, Luxembourg, Mexico, the Netherlands, Peru, Portugal, the Republic of Korea, the Republic of Moldova, Romania, Slovakia, Slovenia, and Uruguay.



► Comments on Transfer

Nine States Parties provided “comments on transfer” for at least some imports of major conventional weapons in their 2019 ATT annual reports, representing 41 percent of States Parties that reported imports of major conventional weapons.³² By comparison, 35 percent of States Parties that reported major conventional weapons imports in their 2018 ATT annual reports included comments on at least some of the items imported, 24 percent of States Parties provided such information in their 2017 ATT annual reports, 27 percent of States Parties did so in their 2016 ATT annual reports, and 22 percent of reporting States Parties did so in their 2015 ATT annual reports. Through these comments, States Parties often provided information on the intended purpose of the transfers, such as to contribute to a museum display or to be used in testing.

Thirteen States Parties provided “comments on transfer” for at least some of their reported 2019 SALW imports, representing 38 percent of States Parties that reported imports of SALW.³³ By comparison, 36 percent of States Parties that reported SALW imports in their 2018 ATT annual reports provided comments on transfer, 24 percent of States Parties did so in their 2017 ATT annual reports, 32 percent of States Parties provided such information in their 2016 ATT annual reports, and 33 percent of States Parties did so in their 2015 ATT annual reports.

Figure 15: Annual Proportion of States Parties that Reported Imports of Major Conventional Weapons and SALW and Provided Comments on Transfer

Year of ATT Annual Report	Percent of States Parties that Provided Comments on Transfer for their Reported Major Conventional Weapons Imports	Percent of States Parties that Provided Comments on Transfer for their Reported SALW Imports
2015	22%	33%
2016	27%	32%
2017	24%	24%
2018	35%	36%
2019	41%	38%

³² The nine States Parties that included at least some comments on transfers of major conventional weapons imports are: Argentina, Australia, Belgium, Denmark, Latvia, Mexico, Slovakia, Slovenia, and Switzerland.

³³ The 13 States Parties that included at least some comments on transfers of SALW imports are: Argentina, Belgium, Czech Republic, Germany, Jamaica, Liechtenstein, Luxembourg, Mexico, the Netherlands, Peru, Romania, Slovakia, and Slovenia.

RELATIONSHIP BETWEEN ATT AND UNROCA ANNUAL REPORTS

Article 13.3 of the ATT allows States Parties to submit their UNROCA report as their ATT annual report. Three States Parties – Australia, France, and the United Kingdom – have done so for their 2019 ATT annual reports, providing information as captured in their 2019 UNROCA submissions. As in prior years, States have treated the relationship between the UNROCA and the ATT in different ways. Some ATT States Parties have resumed their UNROCA reporting since they began reporting to the ATT, while other States Parties are now reporting to UNROCA less often.³⁴

As of 5 October 2020, 33 UN Member States submitted a 2019 UNROCA report on arms exports, imports, and military holdings, according to UNROCA's website.³⁵ Twenty-Nine of these 33 States are States Parties to the ATT – 28 of which were required to submit a 2019 ATT annual report.³⁶

Furthermore, one ATT State Party, Bulgaria, submitted its 2019 UNROCA report but has not yet submitted its 2019 ATT annual report, despite both reports having the same deadline and despite the ATT permitting States Parties to submit their UNROCA reports as their annual reports. And three States Parties that submitted private 2019 ATT annual reports – Greece, Kazakhstan, and Lithuania – reported publicly on their 2019 arms exports and imports to UNROCA. In its 2019 UNROCA report, Greece provided public information on exports and imports of both major conventional weapons systems and SALW, offering details on the final importing States, the number of items exported, descriptions of items, and comments on the transfers.³⁷ Kazakhstan reported publicly on small arms imports, providing information on the exporting States, the number of items imported, and descriptions of those items.³⁸ And Lithuania reported publicly on SALW exports and on imports of both major conventional weapons and SALW, offering details on the exporting and importing States, the number of items, and, at times, descriptions of items and comments on the transfers.³⁹ Thus, through their 2019 UNROCA reports, Greece, Kazakhstan, and Lithuania demonstrated their capacity to provide public information on their annual arms exports and imports and contribute to greater transparency in the global arms trade, which stands in contrast to their private 2019 ATT annual reports.

³⁴ Arms Trade Treaty-Baseline Assessment Project, *The Known Unknowns: Examining the 2018 ATT Annual Reports*, October 2019, http://www.armstrade.info/wp-content/uploads/2014/10/2018-Annual-Reports-Analysis_Web-Version.pdf.

³⁵ The data on 2019 UNROCA reports included in this section are based on information provided in the UNROCA database, last accessed 30 September 2020, available at www.unroca.org. The authors recognize that some UNROCA reports are missing from the database.

³⁶ The 29 ATT States Parties that submitted a 2019 UNROCA report are: Argentina, Australia, Austria, Belgium, Bulgaria, Canada, Czech Republic, Finland, France, Germany, Greece, Italy, Japan, Kazakhstan, Latvia, Liechtenstein, Lithuania, Luxembourg, the Netherlands, Peru, Poland, Portugal, the Republic of Moldova, Romania, Slovenia, Spain, Sweden, Switzerland, and the United Kingdom. Of these, Canada was not required to submit a 2019 ATT annual report.

³⁷ UN Register of Conventional Arms, *Greece National Report: 2019*, <https://www.unroca.org/greece/report/2019/>.

³⁸ UN Register of Conventional Arms, *Kazakhstan National Report: 2019*, <https://www.unroca.org/kazakhstan/report/2019/>.

³⁹ UN Register of Conventional Arms, *Lithuania National Report: 2019*, <https://www.unroca.org/lithuania/report/2019/>.

Kazakhstan, a first time reporter to the ATT, reported to UNROCA in 2019 for the first time since 2012, which may reflect renewed attention to and/or capacities for reporting on annual arms exports and imports following the ATT's entry into force for Kazakhstan. This adds to what may be a positive influence of the ATT's reporting requirement on broader reporting efforts for certain States.⁴⁰ However, it is worth reiterating that for some States, there also appears to be a pattern of ceasing to report to UNROCA following the entry into force of the ATT. For example, Croatia and Denmark last submitted a UNROCA report in 2015, capturing information on their 2014 arms exports and imports. By comparison, both countries have submitted annual reports on arms exports and imports to the ATT Secretariat every year since 2016, the first year that ATT annual reporting was required following the treaty's entry into force. Such examples perhaps indicate a more complex relationship between the two reporting instruments.



⁴⁰ For more insight on the interrelationship between reporting to the ATT and UNROCA, see: Arms Trade Treaty-Baseline Assessment Project, *The Known Unknowns: Examining the 2018 ATT Annual Reports*, October 2019, http://www.armstrade.info/wp-content/uploads/2014/10/2018-Annual-Reports-Analysis_Web-Version.pdf.

CONCLUSION

As we near the end of five years of ATT reporting, we can note some concerning trends.

Compliance with the ATT's annual reporting requirement is on a downward trajectory. While the global COVID-19 pandemic might have impacted the submission of the 2019 reports, a decline in annual reporting is worrisome. At the same time that overall reporting is decreasing, for those reports that are submitted, we see an increase in private reporting. For example, while just two percent of the first annual reports submitted in 2016 were private, 21 percent of the reports submitted in 2020 were private.

States Parties are not only submitting their reports privately at an increasing rate, but they are also excluding and withholding "commercially sensitive and/or national security-related information" from their annual reports with greater frequency. Since the submission of the 2015 ATT annual reports, nearly 20 percent of publicly available annual reports each year have made clear that they exclude "commercially sensitive and/or national security-related data." Twenty-One percent of publicly available 2019 ATT annual reports withheld such information, reflecting the second-highest rate of information withheld since ATT reporting began.

The lack of reporting remains problematic for the ATT's efficacy. Not only is there a legal requirement for States Parties to report, but a lack of reporting threatens to undermine the treaty's objective of transparency and confidence building in the global arms trade. It is clear that fundamental misunderstandings about reporting requirements are still quite prominent, including the meaning of terms in the reporting template, the requirements concerning what information must be reported, and the importance of consistency within a State Party's submission. These are challenges not just for the ATT Secretariat or the Working Group on Transparency and Reporting, but for all those responsible for compiling and supporting national reports. Universal reporting compliance is essential to evaluating the treaty's impact and providing a global picture of the international arms trade, and thus can and should be a priority before it's too late to reverse these negative trends.



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