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National Data Collection Processes for CBM Submissions

Revisiting the Confidence Building Measures (CBM) of the Biological and Toxin Weapons Convention (BTWC) after Twenty Years of CBM submissions

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Following the successful Sixth Review Conference in 2006, the Biological and Toxin Weapons Convention (BTWC) is back on track. States Parties are addressing the challenges through a forward-looking approach. The mandate of the newly created Geneva-based Implementation Support Unit, which is to assist in the promotion and implementation of the Convention, is proving effective. Another Intersessional Process leading up to the next Review Conference in 2011 is well under way and already providing useful results.

Despite these recent reinforcements of the multilateral efforts, we must remind ourselves that there is still no system in place to ensure compliance with the Convention. In the absence of a verification mechanism, the Confidence Building Measures (CBMs) remain the only tool available to establish transparency and build confidence among States Parties.

Switzerland therefore believes that it is of great importance for the credibility of the Convention to enhance the effectiveness and strength of the CBM mechanism. Building on initial efforts at the 2006 Review Conference, and inspired by the agreement among States Parties that the CBM mechanism requires further attention in the coming years, Switzerland has decided to complement earlier approaches by focusing on national data collection processes.

To support the CBM debate, Switzerland mandated the BIOS Centre of the London School of Economics (LSE) and the Verification Research, Training and Information Centre (VERTIC) to deliver quantitative and qualitative research on CBM completion processes. We hope that this will assist States Parties in setting up or streamlining their own data collection, collation and submission processes. Furthermore, we believe the study will provide a solid base for our discussions about the challenges of the CBM mechanism, and that it may also assist us in finding new ways of addressing those challenges.

We would like to thank the authors, Dr Filippa Lentzos and Ms Angela Woodward, for this timely and substantial report. Our thanks also go to Mr Richard Lennane and Dr Piers Millett for supplying comprehensive statistical data at a time when the ISU was still in the early phases of becoming fully operational. And last but not least, we thank all those who contributed to the report through their participation and helpful comments.

Ambassador Raimund Kunz
Head, Directorate for Security Policy
Swiss Federal Department of Defence, Civil Protection and Sports
• The CBM mechanism is challenged by a lack of participation and by inconsistent participation.

• States Parties have different attitudes towards CBM submissions: some see them as a positive means of creating and enabling transparency, and strive towards making timely and complete submissions; others treat CBMs as a burden or an uncomfortable duty, and dedicate less resources and effort to their submissions.

• There are diverse understandings among States and between collators in the same State about the categories “nothing to declare” and “nothing new to declare”.

• The CBM completion process requires some interpretation as to what should be included and what should not; technical expertise with an understanding of the political aim of the CBM mechanism is crucial.

• There is confusion and at times different understandings between States, but also between those collating the information and those providing it, of the level of information required and the kind of information that is useful on the submitted forms.

• There are significant differences between States in their ability to obtain the required information due to disparities in resources and legal powers and to language difficulties.

• A range of efforts have been made at national levels to raise awareness among stakeholders of the CBM mechanism and to increase the quality of the information submitted, e.g. developing guides on how to complete the forms, providing copies of previously filled out forms, translating forms into the national language to avoid language problems, visiting premises in person, holding seminars on a regular or one-off basis, etc.

• There are differences in national review processes of the collated information, and in opinions on how to best enable transparency and to whom.

• Continuity through collator rotations can be greatly aided by comprehensive and up-to-date handover notes, as well as through close working relationships between predecessors/successors and technical experts.

• There is a genuine willingness by collators to help other collators, both those in States starting the process for the first time and those in States which have been submitting returns for some time but who may have specific questions on ways to improve the data collection process.
The Confidence Building Measures (CBM) information exchange process is an important transparency mechanism for the BTWC and provides States Parties with useful information concerning compliance with the Convention.

There are various ongoing efforts to enhance the effectiveness of the CBM mechanism. These have generally tended to focus on strengthening the role of the United Nations Office of Disarmament Affairs (ODA) in facilitating, collecting and distributing the submissions among States Parties; on the suitability of the information requested; and on redesigning the existing forms and moving towards an electronic information management system. Addressing these issues will improve States Parties’ ability to provide information on their compliance with the Convention. However, little attention has been paid to understanding States Parties’ national processes of collating data for CBM submissions.

There are a number of shortcomings in the implementation of the CBM mechanism. A central concern relates to the accuracy and comprehensiveness of the data submitted. To improve the quality of the data submitted it is fundamentally important to understand the particular challenges and needs arising in different national contexts and how this impacts on CBM submissions.

The study presented in this report on national data collection processes was initiated in order to draw out the experience and perspectives of those tasked with preparing the CBM return and to provide concrete examples of problems and solutions, of models, and of lessons learned in the submission process. We hope the study will be constructive not only for States Parties submitting CBMs for the first time, but also for States that have consistently been submitting them for some time and for which a procedural review might be helpful.

We wish to thank the officials who generously gave their time in participating in the study and who helped us with the translations; our research assistants Rocio Escauriaza and Lindsey Gurin for their thorough work, enthusiasm and perseverance; our colleagues for their insights and encouragement; and the Directorate for Security Policy of the Swiss Federal Department of Defence for its helpful contributions to and support of the project.

Filippa Lentzos and Angela Woodward
London, 3 December 2007
Design of the study

The study sampled a small number (10) of States Parties that have consistently submitted returns since the CBM mechanism was agreed in 1986. The sample was selected on the basis of representation from the Eastern Group, the Group of the Non-Aligned Movement and Other States (NAM), and the Western Group. To the extent practically possible, the sample was also selected to increase variation in political systems, socio-economic indicators, population size, and geography of the States represented.

The study principally relied on interviews and written questionnaires. The type of questions asked were:

- When is the data collection process initiated?
- Who is contacted for information? How are they identified? How are they contacted?
- How many people are involved, and how much time is spent in total?
- What difficulties, if any, have been encountered during the process?
- What lessons have been learned over the years regarding which processes work and do not work so well?
- What advice could be given to help governments beginning this process for the first time?

Participants in the study were assured that any information provided relating to themselves or other individuals would be treated strictly in confidence and that every effort would be taken to ensure national data is anonymised in any published work.

Data from the sample were complemented by informal discussions with a small number of individuals closely involved in the CBM process that clarified and further elaborated themes identified through the interviews and written questionnaires.

In parallel to researching national data collection processes, Switzerland asked the Implementation Support Unit to provide answers to a set of questions that would place the findings from the sample in the broader context of CBM submissions by all States Parties. The questions asked were:

- How many States Parties have defined their focal point to date, and, of these, which are the departments identified as focal points?
- How many States Parties submitted their CBM returns electronically in 2007?
- How many States Parties have approached the ODA/ISU for assistance in completing their CBM return before and after 2006?
- In the 1987–2007 timeframe, how many States Parties have submitted CBM returns in: Arabic; Chinese; English; French; Russian; Spanish?
The Second Review Conference in 1986 agreed to introduce Confidence Building Measures “in order to prevent or reduce the occurrence of ambiguities, doubts and suspicions and in order to improve international co-operation in the field of peaceful biological activities”. The CBMs were elaborated at a meeting of scientific and technical experts in 1987, and were modified and considerably expanded by the Third Review Conference in 1991. They have not been modified since, although the Sixth Review Conference in 2006 agreed on various improvements to the mechanisms for submission and distribution.

As agreed at the Third Review Conference, CBMs consist of seven measures, A to G:

<table>
<thead>
<tr>
<th>CBM A</th>
<th>Part 1: Exchange of data on research centres and laboratories</th>
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<tr>
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<td>Part 2: Exchange of information on national biological defence</td>
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<td>research and development programmes</td>
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<td>CBM B</td>
<td>Exchange of information on outbreaks of infectious diseases and</td>
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<td></td>
<td>similar occurrences caused by toxins</td>
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<td>CBM C</td>
<td>Encouragement of publication of results and promotion of use of</td>
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<td></td>
<td>knowledge</td>
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<td>CBM D</td>
<td>Active promotion of contacts</td>
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<td>CBM E</td>
<td>Declaration of legislation, regulations and other measures</td>
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<td>CBM F</td>
<td>Declaration of past activities in offensive and/or defensive</td>
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<tr>
<td></td>
<td>biological research and development programmes</td>
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<tr>
<td>CBM G</td>
<td>Declaration of vaccine production facilities</td>
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</table>

Data provided in the publicly available CBM submission summary report indicate that over the last twenty years the annual number of CBM submissions has been somewhere between 30 at its lowest (in 1987) and 61 at its highest (in 2007). Annual CBM submissions are thus made by substantially less than half, and often less than a third, of States party to the BTWC. This lack of participation in the CBM mechanism is further challenged by inconsistent submissions, where States submit returns in some years but not in others, and by incomplete submissions, where only some of the seven forms are submitted but not all. Chart 1 overleaf illustrates the annual number of CBM returns submitted and the proportion of these that are complete.

A key research priority leading up to the Seventh Review Conference in 2011 should clearly be to empirically explore what impediments the relevant States Parties face in submitting their CBMs.
Another central concern in the implementation of the CBM mechanism relates to the accuracy and comprehensiveness of the data submitted. It is this that forms the focus of the study reported here.

Since the forms were modified and expanded following the 1991 Review Conference, States Parties have for each form been able to: 1) submit a declaration, 2) note they have nothing new to declare, or 3) note they have nothing to declare.

The eight charts in the appendix detail the extent to which States Parties have submitted a declaration or noted nothing or nothing new to declare for each CBM form (A–G) since 1992. With the exception of CBM B on outbreaks of infectious diseases, the majority of States consistently note nothing or nothing new to declare on the forms they submit. In the case of CBM B, approximately one third of States note nothing or nothing new to declare on the form.

The ten States Parties sampled in this study varied markedly in whether they tended to submit a declaration or whether they tended to note nothing or nothing new to declare. For example, as Table 1 shows, State Party 3 has submitted 143 forms with declarations and only 4 forms with nothing or nothing new to declare, in contrast to State Party 6 which has submitted 31 forms with declarations and 100 forms with nothing or nothing new to declare. The aim of this study was to delve behind these numbers and ask how the States Parties collect, collate and submit their CBM-relevant data.

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*Table 1: Participation in the CBM mechanism by the ten States Parties sampled.*
Completing the CBM forms can be a lengthy and difficult exercise, especially the first time it is done. Collecting the necessary information typically requires contacting several different government ministries and agencies. In larger countries, the necessary information may be held at a state or provincial rather than national level, further complicating the task.

The study sought to provide concrete examples of this process from a small number of States Parties that have consistently submitted returns over the last twenty years. Some of these States were administratively very small, others very large. They had different systems of government, were located on different continents, and submitted their CBMs in different languages through different means. Without exception, they were all tremendously helpful in explaining how data collection, collation and CBM submission take place in practice.

The CBM completion process generally starts with the “national contact point”. As of 12 September 2007, 47 States Parties had informed the ISU of their designated national contact point. One State had identified two contact points.

As Chart 2 illustrates, these national contact points tend to be located in the department or ministry of foreign affairs. This was indeed also the case with the States sampled in the study, although not all of them have to date officially notified the ISU of their contact point.

The study highlighted, however, that the technical expertise required to complete the CBM forms is generally located outside the department or ministry of foreign affairs. While in some of the States sampled the
department or ministry drew on this expertise as and when the need arose, other States outsourced the entire data collection and return collation process to separate agencies, such as ministries of defence, industry or science and technology. In some States the collection and collation process had been undertaken by the same agency and/or section over the entire twenty year period the CBM mechanism has operated; in others it had changed over the years.

**Timeframe**

CBM returns are to be submitted no later than 15 April each year. The information provided should cover the previous calendar year; for example, CBMs covering calendar year 2007 should be submitted no later than 15 April 2008.

The study found significant variation in the amount of time the overall collation process took between States, as well as across different years for each State. The process generally took between two to three months for all States in the sample. While most of the States started the collation process in January, some of the larger States started in December and those in the Southern Hemisphere started even earlier in November to avoid the December–January holiday season.

The time dedicated by officials to compile the CBM return ranged from 2–3 days to 14–21 days, depending on the amount of data and number of agencies contacted during the process. Many remarked that the collation process often had to be fitted in around more pressing concerns and responsibilities – few States had individuals solely dedicated to CBM submissions. In addition to the collator’s time, officials in institutions which respond to requests for CBM–relevant information and national experts who advise the information collator also spend time on the submissions.

Once information collation routines are established, the process generally takes less time. However, as one participant noted, CBM data collection is “a living process, not a routine exercise; departmental structures change, new legislation comes in, people are given different responsibilities, so the process is always evolving.” And in years when the process is reviewed a great deal more time and resources are required.

**Collecting the information**

For the consistent submitters sampled in the study, the information collection process tended to start with a review of the information submitted the preceding year. A substantial part of the ensuing information collection process was primarily about updating previously collected information, not about obtaining an entirely new set of data.
Some of the novel information that needs to be annually collected for the CBMs is available through reports that States are required to submit to other intergovernmental bodies. For example: reports on human diseases submitted to the World Health Organisation under the International Health Regulations; reports on animal diseases submitted to the World Organisation for Animal Health; reports on plant disease outbreaks submitted to the Food and Agriculture Organisation; reports on legislation, regulations and other measures provided to the United Nations Security Council 1540 Committee. However, sometimes the timelines used in these reports do not correspond exactly with those required for the CBMs so some additional information—gathering is usually required. In a small number of States sampled some of the novel information that needs to be annually collected for the CBMs is also available on the websites of relevant institutions.

Certain information required for the CBM submissions needs to be specifically collected though, and most collators have a list of institutions they contact annually for this information. The list at its most basic includes the ministries of defence, health and agriculture, but it may also include ministries of science, technology, education, trade, and industry among others, as well as institutions such as public and private laboratories, hospitals, commercial companies, professional associations connected with industry, the national academy of science, individual universities or the association representing universities, professional associations connected with biology, etc. Some collators actively search for new institutions or companies that should be contacted.

In the States sampled, the number of institutions contacted ranged from 4 to 35, with most States contacting between 5 and 10 institutions. Few States collected information from industry.

To obtain the information, the collator usually sends an initial letter or email to the institution explaining the CBM process and requesting the provision of specific information. Some States used standardised letters and sent out all of the CBM forms to all institutions; others adopted a more targeted approach and tailored each letter to the individual institution and included only the forms for which the institution was expected to provide information. A few States also included the completed form or forms from the previous year; one State included the (publicly available) CBM return from another State Party as an example of the sorts of information that should be provided.

In the smaller States, the collator would often know the relevant individuals in the different institutions personally, and had often worked closely with them in either their current position or in previous posts. This significantly facilitated the data collection process. Other collators had found it difficult to locate the right person in the different institutions, often due to institutional restructuring or frequent rotations.

Most collators sent out reminder emails or followed up their initial letters by phone. While most States did not experience significant delays in obtaining
the required information, some did: one State quoted a response rate as low as 35 percent to their request for information.

Many collators drew attention to the broad scope of the information requested in the CBMs. They noted that especially when institutions were submitting information for the first time they provided data that was not directly related to the BTWC. But even for institutions that had been providing information for a number of years, confusion remained: should, for instance, laboratories that are BSL4–capable but operate at BSL3 be declared? Sometimes things were declared simply because they had been declared in previous years even though they strictly speaking did not need to be declared: “Continued declaration is the line of least resistance.”

Collators also drew attention to the role of subjective judgement and interpretation. One collator, for example, with reference to CBM C on dissemination of research results, noted:

“There are obviously too many publications to list them all. It would probably take me 4 days if I was to do that! We have the annual report with the list of publications we produce here [at the national laboratory], but I don’t have the resources to go and check for all the work published with relevance to the Convention from universities and other places. I know it is asked for, but we don’t provide it. I calculate how much would be gained from knowing this information and how much effort it would take me. So it’s a question of setting priorities and I think it is more important to know about procurement for example, than about things that people could find themselves if they carried out the searches. But that’s a subjective judgement.”

The utility of some of the information requested on the forms was also questioned:

“With some of the questions I have difficulty seeing how this is useful, or at least how it is useful without asking more specific questions. What does it help to know the overall surface of a BSL4 laboratory? To be useful, I would need to know how many people work there, what type of experiments they do, what capabilities there are. Sure, parameters like surface area give you a general idea, so if it’s small enough certain things cannot be done, but that’s pretty much all you can get from that. Where you have large surface areas you can’t interpret a single thing.”

Another collator highlighted the different perspectives of those collecting the information and of those providing it:

“When you request information from a department it is fairly easy to communicate the kind of information required because at that level the individual involved will be both a scientist and someone who understands policy. It is when that department then requests the information from its subsidiary laboratories that an understanding of policy relevance is lost. Scientists will often have a very different
perspective on what constitutes relevant information and our returns could quickly end up being hundreds of pages. So the collator often needs to filter large amounts of information coming in.”

In efforts to clarify the kind of information required, one of the smaller States sampled had in the past physically visited the relevant institutions to explain the process, but in the last couple of years instead held a one-day seminar open to all the stakeholders on how to fill in the forms. Another State in the sample also held regular meetings with stakeholders, and prepared educational material for distribution.

Legal authority

One State in the sample had enacted legislation to require the provision of information for the CBM mechanism. A number of collators expressed a wish for this legal authority as some institutions did not consider that they were obliged to provide this information, were constrained from providing it without a legal mandate, or did not have the resources to provide such information on a voluntary basis, at least not within the given timeframe. It was also noted that a legal mandate could facilitate the collection of relevant information from industry.

Some explained that information collected for local, regional or state purposes could not be provided for national purposes without a legal mandate. So while the information provided in the CBM returns may be fairly complete at the national level, it may be very incomplete at the local, regional or state level. Somewhat similarly, it was explained by others that information that was relevant to the CBMs but collected by ministries through various legislation unrelated to the CBM mechanism was often problematic to use at an international level. This was primarily for competitive reasons.

Other collators provided different points of view: some had not experienced difficulties in obtaining the appropriate information, and some considered that the politically-binding nature of the CBM mechanism precluded the need for national legislation.

“Nothing to declare” versus “nothing new to declare”

The study found inconsistent interpretation of the “nothing to declare” and “nothing new to declare” categories on Form 0. Some compilers said the categories were confusing and that they were often unsure which one was most appropriate. Some said they simply copied what had been reported previously, others said they actively made new assessments every year on the basis of the current information. One compiler noted that he knew he was
interpreting the two categories differently to his predecessor, but that he felt his current interpretation was more accurate. Data from the publicly available CBM submission summary report appears to bear this out. For example, States may submit a declaration under a specific form in one year but may in subsequent years note “nothing to declare” rather than “nothing new to declare” for that particular form.

The interpretation of the “nothing to declare” and “nothing new to declare” categories may not only vary between States then, but also between different compilers in different years within the same State. Discussing the difficulties of this, one compiler noted: “If I see “nothing new to declare” I would like to see the original piece of information.”

**Review of collated information**

Once the appropriate information had been collated, a review of the collective data was generally carried out by the collator or a broader group. In most States sampled, this review was to ensure relevance, comprehensiveness and accuracy of data, and to ensure the current information was in line with that provided in previous years.

In some States, the review was also carried out for security purposes. Most States, though, ensured that contributing institutions were aware that the information they provided was suitable for dissemination to other States Parties or more widely.

One State had recently completed a full review of the information it provided in its CBM returns. The review brought together all the relevant departments for a set of consecutive meetings over a short period of time. These meetings encouraged an evolving dialogue to take place between the various stakeholders contributing to the CBM return – who come to the process with very different perspectives and very different concerns (political, technical, security) – and allowed a national agreement to be reached on the kind of information it would be appropriate to release in its CBM returns.

None of the States sampled had processes in place for reviewing the collective data for commercially sensitive or proprietary information. This was not generally considered an issue, however, as very few States gathered information from private industry.
In the past twenty years, 12 CBM returns have been submitted in Arabic, 19 in Chinese, 622 in English, 45 in French, 123 in Russian and 86 in Spanish. Chart 3 illustrates this in terms of percentages.

**Chart 3: The proportion of CBM returns submitted in the six official languages over the timeframe 1987–2007.**

CBM returns in four of these languages were represented in the study. In one of the States sampled the national language was not that of any of the six official UN languages and this had caused considerable difficulties in providing the information for the CBM submission. In this particular case some of the institutions had asked the Ministry of Foreign Affairs to translate the English forms into the national language so that they could provide answers in their national language. These answers would then have to be translated back into English. For some of this data the compiler did not know the corresponding English terminology. For example he did not know the English name for the specific diseases listed, and the Ministry of Health did not translate them, with the end result that the disease outbreak list was not included in the CBM return.
The Sixth Review Conference in 2006 developed a mechanism for the electronic submission and distribution of CBMs. States Parties are now encouraged to submit their CBMs by email. As of 12 September 2007, at least 28 States Parties had submitted CBM returns electronically. Most of these States also opted to provide hard copies of their returns.

Paper publication of CBM submissions has been discontinued. Instead, CBM submissions are published in the restricted area of the BTWC website, unless the submitting State Party requests otherwise. At present, three States have decided not to publish their CBMs online in the restricted area. CBM submissions not published in the restricted area are circulated to States Parties on CD-ROM.

Certain States have decided to make their CBM returns available on the public section of the BTWC website. To date these are: Australia (2006 and 2007 CBM returns), Denmark (2007 CBM returns), Finland (2006 and 2007 CBM returns), Germany (2007 CBM returns), Lithuania (2006 and 2007 CBM returns), Malaysia (2006 CBM returns), Sweden (2006 and 2007 CBM returns), Switzerland (2006 and 2007 CBM returns), and the United Kingdom (2006 and 2007 CBM returns).

Some States also make their CBM returns publicly available on national websites, and these go back to 2003 and 2004 in some cases.

The States represented in the study varied significantly in what they took transparency and the aim of the CBM mechanism to be. Some, like the States listing their returns on the public section of the BTWC website, understood transparency to involve the public and were happy to make their CBM returns freely available online. Others understood the exchange of information under the CBM mechanism to solely involve States Parties, and maintained that any public dissemination of the data contained in the CBM returns would be contrary to national security. Yet others said that while they do not make their CBM returns available online, they would be happy to release them on request. One State noted it would have made its returns publicly available but that one company was hesitant about this, so for the time being the return was only posted on the restricted area of the BTWC website.

The States sampled experienced very high turnovers of CBM collators. Most States operated on the basis of two– or three–year rotations, but at least one State had annual rotations, which over the twenty–year period it had been submitting returns amounted to a total of 20 different collators.
Some States ensured continuity between collators through overlap of duties, or by ensuring they remained in contact so the new collator could ask questions as and when they arose. Some States also assured continuity through their technical experts. One State provided CBM-dedicated training for new collators.

While not all States in the sample had developed handover notes for successors, all agreed they would be a very useful resource. At its most basic these constitute previous returns and a list of relevant institutions to contact. They may also contain a more detailed contact list outlining divisions, positions and individual names; templates of letters and the questionnaires sent out; an archive of correspondence; instructions on the process that are continually updated, possibly with helpful tips or particular difficulties to look out for (the “do’s and don’ts”); one State even included a list of weaknesses in its own processes.

**ODA/ISU assistance in completing CBM submissions**

The ISU has no formal record of requests made until this year, but would estimate:

- From 2003–2005, staff in Geneva received an average of 10 enquiries per year wanting simple administrative assistance (e.g. copies of the blank forms, address for submitting the CBM), and an average of 2 enquiries wanting more detailed assistance (what sort of information to put on which form, etc).

- So far this year the ISU has received only a few brief enquiries about where to send CBMs (perhaps because information is readily available on the BTWC website).

One State in the sample had been involved in helping other States Parties establish CBM submission processes. While the other States in the sample had no direct experience of this, most collators said they would be very happy to provide assistance. Some had been involved more generally in regional awareness raising of the BTWC, and had emphasised the value and significance of CBMs in this context.
The CBM mechanism is challenged by a lack of participation and by inconsistent participation.

States Parties have different attitudes towards CBM submissions: some see them as a positive means of creating and enabling transparency, and strive towards making timely and complete submissions; others treat CBMs as a burden or an uncomfortable duty, and dedicate less resources and effort to their submissions.

There are diverse understandings among States and between collators in the same State about the categories “nothing to declare” and “nothing new to declare”.

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There are significant differences between States in their ability to obtain the required information due to disparities in resources and legal powers and to language difficulties.

A range of efforts have been made at national levels to raise awareness among stakeholders of the CBM mechanism and to increase the quality of the information submitted, e.g. developing guides on how to complete the forms, providing copies of previously filled out forms, translating forms into the national language to avoid language problems, visiting premises in person, holding seminars on a regular or one-off basis, etc.

There are differences in national review processes of the collated information, and in opinions on how to best enable transparency and to whom.

Continuity through collator rotations can be greatly aided by comprehensive and up-to-date handover notes, as well as through close working relationships between predecessors/successors and technical experts.

There is a genuine willingness by collators to help other collators, both those in States starting the process for the first time and those in States which have been submitting returns for some time but who may have specific questions on ways to improve the data collection process.
CBM declarations since 1992 indicating for each CBM form the annual number of States submitting a declaration and the annual number of States noting they have nothing or nothing new to declare.

**CBM A1: research centres and labs**

<table>
<thead>
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**CBM A2: defence programmes**

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CBM E: legislation and regulations

CBM F: past offensive/defensive programmes

CBM G: vaccine production facilities