

IVORY UPDATE

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1. Executive Summary

This ivory report documents the seizure of more than 30 tonnes of ivory since CoP13 (November 2004). Since 1998, when the Species Survival Network first began collecting data on ivory seizures, more than 151 tonnes of ivory have been recorded as seized.

The Species Survival Network Elephant Working Group has produced reports on ivory seizures and elephant poaching for the last three meetings of the Conference of the Parties to CITES (CoP), with the aim of providing CITES Parties with up to date information about the state of the illegal trade in elephant ivory. The report published for CoP13, *The Tip of the Tusk*, is available at the following web address: <http://www.bornfree.org.uk/CITES/040916.shtml>

This interim ivory report has been prepared for the 54th meeting of the CITES Standing Committee (SC54) and is intended to update the Parties on significant ivory seizure information since CoP13. It will additionally discuss elephant issues that will arise at SC54, including the one-off trade of ivory approved at CoP12, MIKE (Monitoring the Illegal Killing of Elephants) baseline data, and the ivory Action Plan. Finally, it will comment on the issue of ivory stockpiles and problems relating to the harmonisation of seizure reporting.

2. Standing Committee-Approved Ivory Exports

At the 12th meeting of the Conference of the Parties to CITES (Santiago, Chile, 2002), the Parties approved a one-off sale of 60 tonnes of ivory (30 tonnes from South Africa, 20 tonnes from Botswana and 10 tonnes from Namibia). No such trade has taken place as conditions placed upon these exports have not been met to the satisfaction of the Standing Committee. These conditions are:

- i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin) and, in the case of South Africa, only ivory originating from the Kruger National Park;*
- ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev CoP12) concerning domestic manufacturing and trade;*
- iii) not before the Secretariat has verified the prospective importing countries, and the MIKE programme has reported to the Secretariat on the baseline information (e.g. elephant population numbers, incidence of illegal killing);*
- iv) a maximum of 20,000kg (Botswana), 10,000kg (Namibia) and 30,000kg (South Africa) of ivory may be traded, and despatched in a single shipment under strict supervision of the Secretariat;*
- v) the proceeds of the trade are used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range; and*
- vi) only after the Standing Committee has agreed that the above conditions have been met.*

3. Overview of Ivory Seizures since CoP13

The *Tip of the Tusk*, published for the CITES Parties at CoP13 in 2004, reported that between 1998 and 2004, 95.3 tonnes of ivory had been reported seized, and, in addition, 12,591 elephants had been reportedly poached. 95.3 tonnes of ivory was estimated to represent the death of more than 15,000 elephants.

Since CoP13, there have been a significant number of large seizures of ivory. The following table is a record of some of these seizures, in chronological order:

<u>ELEPHANT IVORY SEIZURES COP13 TO PRESENT</u>					
Date of Seizure	Country	Weight of ivory in kilograms	No. of tusks*	Origin of Ivory	Reference / Notes
LARGE SEIZURES					
December 2004	Vietnam	730		Not specified	AFP (December 2004)
April 2005	Ethiopia	500		Not specified	TRAFFIC (December 2005)
July 2005	Zimbabwe		72	10 tusks reportedly from government stockpile	AC22 Doc 5.1 Africa Regional Report.
August 2005	Republic of Congo	256		Not specified	SABC News (August 2005)
September 2005	Philippines	6,000		Zambia	Xinhuanet (January 2006)
September 2005	Philippines	286		Kenya	Confidential Source
September 2005	Philippines	472		Uganda	Confidential Source
September 2005	Cameroon		91	Republic of Congo	The Last Great Ape Organisation
April 2006	Kenya	160		Not specified	Reuters (April 2006)
May 2006	China	1,800		Not specified	Confidential Source
May 2006	Hong Kong SAR	3,900		Cameroon	Ireland Online (June 2006)
May 2006	Zimbabwe	4,000		(reportedly destined for China)	The Sunday Times (July 2006).
July 2006	Taiwan	3,060		Tanzania	Daily News (July 2006)
July 2006	Taiwan	2,158		Tanzania	The China Post (July 2006)
SMALL SEIZURES					
SUM		5,639	197		Many sources
GRAND TOTAL					
		28,961	360		

The SSN EWG database has 28.961 tonnes of ivory and 360 tusks recorded as seized since CoP13. 360 tusks can be converted to a weight of 1,242kg*. In total, therefore, the SSN EWG has **30.203 tonnes** of ivory recorded as seized since CoP13.

This, including other seizures subsequently reported to SSN (which occurred before CoP13 and have now been entered into the database), brings the total quantity of ivory reported seized since 1998 to **151.430 tonnes**. 151 tonnes of ivory represents the illegal killing of approximately **24,380 elephants.****

A detailed list of these seizures will be made available for the 14th meeting of the Conference of the Parties to CITES in June 2007.

**Using an average tusk size of 3.45kg (Hunter, Martin and Miliken, Pachyderm No. 36, 2004). 72 tusks equate to about 248kg of ivory and 91 tusks equate to about 314kg of ivory and 360 tusks equate to 1,242kg of ivory.*

***Calculation using an average tusk size of 3.45kg per tusk, and 1.8 tusks per elephant.*

4. Domestic Ivory Markets and the Price of Ivory

A number of reports on domestic ivory markets have been published since CoP13, which found the following:

- **Egypt** – 10,709 ivory items seen on sale during a 2005 investigation. Report indicates that prices for raw tusks is 200 – 250% more than for comparable tusks in surveys conducted in 1998 and 1999. Additionally, retail prices for worked ivory were found to be from 2 to 4 times that of late 1998. (*Martin and Miliken, TRAFFIC, 2005*).
- **Europe** – 27,000 ivory products seen on sale in 5 different European countries (*Martin and Stiles, Save the Elephants and Care for the Wild International, 2005*).
- **Angola** – over 1.5 tonnes of worked ivory products are found during an investigation in 2005 (*Miliken, Pole and Huongo, TRAFFIC, 2006*)
- **Mozambique** – 3,254 items found on sale, at least double the amount previously found in 2002. Almost 20% of ivory products were on sale in the departure lounge of the airport. (*Miliken, Pole and Huongo, TRAFFIC, 2006*)
- **Sudan** – a 2005 report found 11,000 ivory items on sale in 50 shops. The report also indicates that the price for ivory has doubled in the past two years. (*Martin, Care for the Wild International, 2005*).

At SC53, TRAFFIC and WWF made various recommendations for action including, in some cases, suspension of trade, to be taken in connection with Djibouti, Thailand, Mozambique, Angola and Egypt.

Reliable sources report that as of July 2006, wholesale prices for good quality contraband elephant ivory in China were in the range of US\$700 to \$750. This represents a three fold increase in price in two years.

5. Elephant Poaching

Reports of elephant poaching continue to pose considerable cause for concern. A recent report from Chad (National Geographic News, August 30th, 2006) documented widespread and uncontrolled poaching in and around Zakouma National Park. Hundreds of elephants are reported to have been slaughtered in just one year. This story is not unusual. Poaching in the Democratic Republic of Congo has recently been reported to be at serious levels. Indeed, the authors of a recent paper in *Pachyderm* (No. 40 January – June 2006) state "*Elephants in KBNP [Kahuzi Biega National Park] are facing a severe unprecedented crisis*" and "*This situation calls for immediate action to find and control the causes to save some of the local wildlife populations from extinction*".

Reports of elephant poaching from Asia, whilst often smaller in quantity than in Africa, are no less important. The removal of just one elephant from a small, fragile population, and particularly the continuous removal of male elephants can have a significant, negative impact. For example, reports indicate that poaching is threatening to cause local extinction of Vietnam's elephant population in the near future (*VietNamNet Bridge, May 2006*).

6. Discussion and Recommendations

6.1 One-Off Ivory Trade

6.1.1 Illegal Ivory Trade

It has been almost four years since the CITES Parties approved the conditional one-off trade of 60 tonnes of ivory at CoP12. No exports have occurred because the conditions have not been met to the satisfaction of the Standing Committee.

It is clear that the illegal trade in elephant ivory is an ongoing threat to elephant populations across Africa and Asia. The recent large number of seizures of considerable size could in part be attributable to improved enforcement, and indeed enforcement efforts over recent years are

certainly to be commended. However, SSN is seriously concerned that these large seizures indicate a substantial and increasing demand for ivory. Reports of escalating market prices of ivory reinforce this conclusion. There is little question that increasing prices ultimately result in greater risks taken by those involved in the trade posing a greater threat to elephant populations. This situation demands the urgent attention of the enforcement authorities to be focused on organised syndicates behind the trade. Furthermore, the SSN EWG recognises that its database of seizures represents only a small proportion of the actual illegal trade. Indeed, it is generally understood that customs officers are pleased to intercept between 10 and 15 percent of all illegal products being shipped internationally.

6.1.2 MIKE

The MIKE programme was developed in reaction to the recognised need for better data on elephant poaching. While it was clear that large quantities of ivory were being smuggled internationally, it was less clear from which populations of elephants the ivory originated. SC54 Doc 26.2 provides the first significant report from MIKE, containing "baseline data", as required by Decision 12.33. SSN has a number of concerns with regard to this report.

Firstly, the baseline data appears incomplete, with all required data available for a maximum of 13 Asian sites, as opposed to the 18 sites approved at the 49th Standing Committee meeting (SC49 Doc 11.2). We also note that whilst 45 sites in Africa have indicated they will have information available by SC54, these include 'alternate sites'. We can find no record of alternate sites for Africa or Asia having been approved by the Standing Committee, nor are we aware of any explanation having been given as to why the original sites have not produced the required data.

SSN is also concerned that MIKE baseline information raises a number of questions with regard to collection and interpretation of the data. Data are drawn over a wide temporal basis, with dates ranging from 2000 to 2005, making it difficult to establish a "global baseline". Also, the data is derived from 8 different collection methods, with raw data then contributing to as many as 6 different scores of 29 influencing factors for each site. The MIKE report (SC54 Doc 26.2) itself recognises that "*The number of potential site attributes, or influencing factors, is quite large and it would be useful to seek some simpler representation in terms of fewer variables.*"

6.1.3 Trading Partners

With regard to the conditions placed upon importing countries for the one-off ivory trade, so far no country has been recognized by the Standing Committee as fulfilling the conditions. Both Japan and China have requested to be designated as "trading partners". Despite evidence that China continues to be a major destination for illegal trade, the Secretariat in SC 54 Doc 26.1 reiterated its opinion "*that China meets the requirements of Res Conf. 10.10.*" On the basis of loopholes exposed by IFAW at SC53, SSN disagrees with the Secretariat's conclusion that China's domestic trade control system complies with Resolution Conf. 10.10 (Rev. CoP12), and urges the Standing Committee not to approve China as a trading partner.

With regard to Japan's international ivory controls, the Secretariat undertook a visit to Japan in March 2005. However, at SC53, the Secretariat announced that another mission to Japan was necessary to complete the verification process. According to SC54 Doc 26.1, the Secretariat planned to make a second visit to Japan in August 2006, but it will not be able to provide a written report to the Standing Committee within the document deadline. Thus, Standing Committee members will not have the opportunity to properly evaluate the complex issue of Japan's ivory trade controls. Since the Secretariat has not produced a written report on Japan's ivory trade controls within the required 60 day deadline, the question of whether they comply with CITES requirements should not be discussed at SC54.

6.2 Ivory Action Plan

An '*Action Plan for the control of trade in African elephant ivory*' was adopted by the Parties at CoP13 in Bangkok, Thailand, in 2004. This Action Plan requires all African elephant range States to take urgent action with regard to unregulated domestic ivory markets and the control of illegal trade in ivory across their respective borders. The Action Plan also directs these Parties to submit

progress reports to the Secretariat for consideration by the Standing Committee and provides for a response to non-compliance with the plan (paragraph 8):

In cases where Parties or non-Parties are found not to implement the action plan, or where ivory is found to be illegally sold, the Secretariat should issue a Notification to the Parties, advising them that the Conference of the Parties recommends that Parties should not engage in commercial trade in specimens of CITES-listed species with the country in question.

At the 53rd Meeting of the CITES Standing Committee, SC53 Doc 20.1, paragraph 3, noted that the Secretariat had received progress reports on implementation of the ivory Action Plan from just 7 African elephant Range States. The Summary Record of the meeting indicates the '*considerable disappointment*' that was expressed as a result of this poor response.

According to SC 54 Doc.26.1, 18 countries have yet to submit progress reports. We disagree with the Secretariat's assumption in SC 54 Doc 26.1 that '*failure to submit a progress report, in itself, should not be considered as a failure to implement the action plan*'. SSN further requests that progress reports received by the CITES Secretariat are made available to all Parties. Sharing information included in these reports may prove to be a vital component in restricting such illegal trade. Each country cannot be viewed in isolation from those surrounding it.

For the Action Plan to be effective, it needs widespread commitment by the Parties. SSN urges the Standing Committee to decide upon deadlines for implementation of components of the Action Plan, particularly those outlined in paragraph 1, and, in accordance with paragraph 8, recommend a suspension of trade in CITES-listed species with those that fail to comply, including through failure to submit progress reports.

6.3 Zimbabwe's African Elephant Annotation

SC54 Doc 26.1 (paragraphs 12 and 13) indicates an incidence of illegal ivory potentially being exported from Zimbabwe to China. Some of this ivory is alleged to have come from government stocks. In addition, in July 2006, The Sunday Times reported on 30 tonnes of ivory being exported from Zimbabwe in the previous 7 months. SSN is deeply concerned that the possible export of such large quantities of ivory can in no way equate to 'non-commercial purposes' as required by Zimbabwe's annotation.

There are indications that abuse of the provision in the annotation enabling non-commercial sale of worked ivory by Zimbabwe, may have been going on for some time. In 2002, Zimbabwe stated, in its amended proposal to CoP12, that there had been a "*steady growth*" in the worked ivory industry through sales to tourists "*despite stricter domestic measures by several developed countries, particularly from Europe*", and that the "*industry now has 65 registered carvers an increase from about 40 in 1997*". How such a steady growth could have been sustained given the collapse in tourism in Zimbabwe remains unclear.

SSN would like to draw Resolution 11.21 (Rev CoP13) to the attention of the Standing Committee. This resolution directs as follows:

a) the Secretariat to report to the Standing Committee, for at least four years following the adoption of a proposal to transfer species from Appendix I to Appendix II subject to a substantive annotation, any credible information it receives indicating a significant increase in the illegal trade in or poaching of such species; and

b) the Standing Committee to investigate any such reports of illegal trade and to take appropriate action to remedy the situation, which may include calling on the Parties to suspend commercial trade in the affected species, or inviting the Depository Government to submit a proposal to amend the annotation or to retransfer the species to Appendix I

A similar provision for such remedial action by the Standing Committee exists in Resolution Conf. 9.24 (Rev. CoP13) for a species transferred from Appendix I to Appendix II where "*an integral part of the amendment proposal is an export quota or other special measure approved by the*

Conference of the Parties, based on management measures described in the supporting statement of the amendment proposal.”

SSN requests the Standing Committee to consider a suspension of trade in CITES-listed species with Zimbabwe. Furthermore, the Secretariat should be directed to undertake, as a matter of urgency, a mission to inspect Zimbabwe's ivory stockpile and to assess its controls over the carving industry and law enforcement with respect to the ivory trade. Indeed, recalling Decision 10.2 (Rev CoP11) in which an 'independent audit of any declared stocks' was approved and subsequently undertaken, SSN would like to suggest that a 'follow-up' independent audit of all stockpiles that were audited under this Decision, might now be beneficial.

6.4 Harmonization of Reporting

Finally, SSN would like to appeal to the Parties to harmonize their ivory reporting. Currently, it is almost impossible to construct a true and accurate record, when there is so little consistency of reporting from countries. Reports of seizures are not only weighed in kilograms, but also measured in the number of tusks, the number of carvings, and even, on occasion, numbers of piano keys. Unless all ivory seized is weighed, and the weight recorded in kilograms, we are concerned that our true understanding of the amount of ivory being seized may be grossly underestimated. SSN has reports of more than 20,000 seized, but unweighed, ivory items on its database.

6.5 Summary of Conclusions and Recommendations

- **Since 2005 there has been a significant increase in the number of seizures of large quantities of ivory. The SSN EWG database has 30.203 tonnes of ivory recorded as seized since CoP13 (October 2004), which is estimated to represent the killing of at least 4,863 elephants.**
- **In total, since 1998, the SSN EWG database has 151.430 tonnes of ivory recorded as seized, which is estimated to represent the killing of at least 24,380 elephants.**
- **In addition to the conditions placed upon the one-off sales at CoP12, the SSN Elephant Working Group urges the Standing Committee to take into consideration the overall state of the illegal trade in elephant ivory, indicated by recent ivory seizures and incidents of poaching.**
- **In light of the large seizures, escalating prices, recent reports on poaching and gaps in the MIKE baseline data, as well as inadequacy of ivory controls in potential trading partners, SSN believes it would be prudent not to approve the one-off ivory exports.**
- **The Standing Committee should establish deadlines for implementation of components of the Action Plan, particularly those outlined in paragraph 1, and, in accordance with paragraph 8, recommend a suspension of trade in CITES-listed species with those that fail to comply, including through failure to submit progress reports.**
- **The Secretariat should be directed, as a matter of urgency, to undertake a mission to inspect Zimbabwe's ivory stockpile and to assess its controls over the carving industry and law enforcement with respect to the ivory trade. Additionally, recalling Decision 10.2, SSN recommend a follow-up independent audit of all ivory stockpiles that were previously audited under this Decision.**
- **The Standing Committee should consider recommending a suspension of trade in CITES-listed species with Zimbabwe.**

- **The Standing Committee should recommend that at CoP14, a recommendation be made to all Parties to harmonise their methods when recording ivory seizures. All ivory seized should be recorded as a weight in kilograms.**