



Councillor Ms. Tanya Chan
Chairperson
Hong Kong Legislative Council Panel for Environmental Affairs

13th March 2017

Dear Ms. Chan,

Re: Proposed plan for phasing out domestic trade in elephant ivory

I write to you on behalf of the Environmental Investigation Agency (EIA), to respectfully urge the Hong Kong Legislative Council Panel for Environmental Affairs to adopt the proposed plan to phase out Hong Kong's domestic ivory market, and to reduce the timescale for the phase-out.

EIA is an international non-governmental organisation dedicated to investigating environmental crime and campaigning for effective legislative and enforcement responses to such crime.

EIA commends the announcement made by the Hong Kong Government in December 2016 proposing a three-step plan to phase out domestic trade in ivory. We welcome the forthcoming debate on this issue in the Hong Kong Legislative Council Panel for Environmental Affairs and respectfully urge the Panel to adopt the proposed plan as a major positive step in global elephant conservation. Further, we request that the Panel reduce the proposed timescale for the phase-out so that, similar to measures announced by the Government of China, the Hong Kong ivory market is closed by end of 2017.

The world's elephant populations are currently in the grip of a devastating poaching epidemic: in 2016, the Great Elephant Census showed a 30% decline in savannah elephants across 15 African countries in just seven years, with the loss of around 144,000 elephants, while a catastrophic 62% decline in forest elephants was observed between 2002 and 2011. Poaching also threatens endangered Asian elephants. The primary driver of poaching is demand for ivory, particularly in China. Elephant poaching and ivory trafficking also has a major negative impact on local communities and economies, and is linked to organised crime and armed militias.

The urgent need to close domestic ivory markets has been increasingly recognised at a global level in recent years. In October 2016, the Conference of the Parties of the Convention on International Trade in Endangered Species of Flora and Fauna (CITES) adopted a recommendation calling for the closure of domestic ivory markets "as a matter of urgency" where they have been linked to poaching and illegal ivory trade.

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Hong Kong is the city with the world's largest legal ivory retail market, and the existing ivory licensing system is fraught with significant loopholes enabling illegal ivory to enter into existing legal stockpiles.ⁱ

EIA respectfully recommends that the proposed plan be amended to reduce the time scale for implementation, for the following reasons:

1. The five-year grace period is unnecessary. A legal study commissioned by WWF showed that the ban could be implemented within two years under current Hong Kong law.ⁱⁱ The study also notes that existing ivory traders have already been given ample opportunities to move away from use of ivory, including a government scheme to retrain in other professions.
2. Other countries with large domestic ivory markets have announced bans with much shorter timescales, most notably the USA and China, the world's largest destination markets for elephant ivory. China declared in December 2016 that its legal ivory market would be phased out entirely by the end of 2017, with the first group of retail outlets ceasing ivory sales by the end of March 2017. An extended phase-out in Hong Kong risks undermining the message to Chinese consumers that ivory is no longer an acceptable product, and could place a considerable burden on Hong Kong Customs, as large amounts of ivory purchased in Hong Kong are already smuggled into Mainland China.
3. The current rapid rate of elephant population decline in Africa shows that ivory markets should be closed as a matter of urgency to end poaching.

We hope that the forthcoming debate in the Legislative Council considers these issues and recommendations. If EIA can be of any assistance or if you require any further information, please do not hesitate to contact me at the address below or by email, maryrice@eia-international.org.

Yours sincerely,



Mary Rice
Executive Director

ⁱ WWF-Hong Kong (Sept. 2015), The Hard Truth: How Hong Kong's Ivory Trade is Fuelling Africa's Elephant Poaching Crisis; WildAid (Oct. 2015), The Illusion of Control: Hong Kong's 'Legal' Ivory Trade; Elephant Action League (2015), Blending Ivory: China's old loopholes, new hopes.

ⁱⁱ WWF (2016), How to Ban the Ivory Trade in Hong Kong Beginning Today, http://www.wwf.org.hk/en/news/press_release/?uNewsID=15860#