

HONG KONG WILDLIFE TRADE WORKING GROUP

22nd March 2017

Hon Tanya Chan
Room 814, Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong

Dear Ms Chan,

Supporting the Hong Kong Government's Ivory Trade Ban and Increase in Penalties for Wildlife Crime

We write to you representing an alliance of interests, *The Hong Kong Wildlife Trade Working Group*, to express our support for the Hong Kong Government's upcoming legislative amendment proposal to i) ban the Hong Kong ivory trade; and ii) increase maximum penalties under the Protection of Endangered Species Ordinance Cap 586.

Hong Kong is globally recognized as a wildlife trade hub that is increasingly used by organized criminal syndicates to traffic a range of wildlife products including elephant ivory.^{i,ii} Although the Convention on Trade in Endangered Species (CITES) banned the international trade in ivory in 1989, Hong Kong has until now allowed the continued trade of Pre-Convention ivory. This 'legal' trade has been administered through a licensing system run by the Agriculture Fisheries and Conservation Department (AFCD), whereby stockpiles of Pre-Convention ivory are registered with AFCD and licensed for commercial purposes.

It is impossible to distinguish 'legal' Pre-Convention ivory from 'illegal' ivory, taken from recently and illegally-killed elephants, without scientific analysis. In the face of increasing consumer demand, this has allowed unscrupulous traders to launder freshly poached illegal ivory into the market as the legally licensed product. There is clear evidence of this practice, through undercover investigations of Hong Kong's Pre-Convention ivory stocks.^{iii,iv} It is also clear that over the 27 years since the international trade ban, Hong Kong's 'legal' pre-ban ivory stocks have not diminished as would be expected, given rising demand from tourists from the Mainland who are the main market for ivory purchased in Hong Kong (and who then smuggle it into China). Traders themselves have explained the practice of replenishing old stocks with newly poached ivory because the licensing system can be easily flouted.^{v,vi}

Today, ivory poaching has reached unprecedented levels, and scientific research estimates tens of thousands of African elephants are killed annually to supply the demand largely in this part of the world. In 2016, the Great Elephant Census^{vii} showed a 30% decline in savannah elephants across 15 African countries in just seven years. This equates to the loss of approximately 144,000 elephants. Between 2002 and 2011, a devastating 62% decline in forest elephants was observed. Given current elephant populations, it is clear that if nothing is done, these animals will become extinct in our lifetime. The illegal ivory trade is not just destroying African elephant populations, but it is also denying developing economies that depend on wildlife for tourism, not to mention the innumerable deaths annually of rangers engaged in their protection.

The Hong Kong government has stated its commitment to the protection of endangered species and recognizes the devastating impact of poaching elephants for their ivory and indeed the role that Hong Kong's trade is playing. Importantly, Hong Kong's first Biodiversity Strategy and Action Plan (BSAP) launched in 2016 clearly commits to phasing out the ivory trade as currently proposed. The proposals are, therefore, in line with accepted government policy.

As a Legislative Council member, we therefore urge you to support the legislative proposals that will phase out Hong Kong's ignominious ivory trade and increase penalties for Cap 586 offences. The government's proposal aims to ban the trade by the end of 2021, notably this is some 32 years after CITES introduced the international ban because of the threat to African Elephants, back then. The urgency for this action is immediate and cannot be understated. Fully comprehending this, in January China committed to end its local ivory trade by the end of 2017. We therefore further encourage the government to enact legislation ban ivory which will ultimately to save elephants, as soon as possible.

Yours sincerely,

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Alice Choi,
Executive Director, Society for the Prevention of Cruelty to Animals, Hong Kong

HONG KONG WILDLIFE TRADE WORKING GROUP

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ⁱ Wildlife Trade Working Group (2015) *Wildlife Crime: Is Hong Kong Doing Enough*. ADM Capital Foundation. Available at: <http://admf.org/resources-wildlife-hong-kong/> [Accessed 17 March 2017].

ⁱⁱ Martin, E. and Vigne, L. (2015) *Hong Kong's Ivory – More Items for Sale than in Any Other City in the World*. Save The Elephants. Available at: <http://savetheelephants.org/wp-content/uploads/2016/11/2015HongKongIvoryReport.pdf> [Accessed 17 March 2017].

ⁱⁱⁱ Knights, P., Hofford, A., Andersson, A. and Cheng, D. (2015) *The Illusion of Control: Hong Kong's 'Legal' Ivory Trade*. WildAid. Available at: <http://wildaid.org/sites/default/files/resources/The%20Illusion%20of%20Control-Full%20Report.pdf> [Accessed 17 March 2017].

^{iv} Lo, C. and Edwards, G. (2015) *The Hard Truth. How Hong Kong's Ivory Trade is Fuelling Africa's Elephant Poaching Crisis*. WWF Hong Kong. Available at: http://awsassets.wwf.hk.panda.org/downloads/wwf_ivorytrade_eng_eversion.pdf [Accessed 17 March 2017].

^v Knights, P., Hofford, A., Andersson, A. and Cheng, D. (2015) *The Illusion of Control: Hong Kong's 'Legal' Ivory Trade*. WildAid. Available at: <http://wildaid.org/sites/default/files/resources/The%20Illusion%20of%20Control-Full%20Report.pdf> [Accessed 17 March 2017].

^{vi} Lo, C. and Edwards, G. (2015) *The Hard Truth. How Hong Kong's Ivory Trade is Fuelling Africa's Elephant Poaching Crisis*. WWF Hong Kong. Available at: http://awsassets.wwf.hk.panda.org/downloads/wwf_ivorytrade_eng_eversion.pdf [Accessed 17 March 2017].

^{vii} Great Elephant Census (2017) *Great Elephant Census*. Available at: <http://www.greatelephantcensus.com/> [Accessed 17 March 2017].