



Ivory Ban

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Sent by: [REDACTED]

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Dear Sir/Madam,

I write firstly to express my strong support for the Government's proposed ban on the import, re-export and possession of pre-Convention ivory for commercial purposes with increased penalties for wildlife crime.

A primary reason, as the Government must recognise by now, is that Hong Kong's "legal" trade in pre-Convention ivory has been administered through a licensing system that has provided a front for laundering illegal ivory. Traders have been found to replenish old ivory stocks with newly poached ivory. Without expensive scientific analysis it is impossible to distinguish "legal" Pre-Convention ivory from "illegal" ivory from poaching. The majority of stock registered with the Government in the 1990s (85%) was from illegal sources. Today, ivory poaching has reached unprecedented levels driven by demand in Asia and Hong Kong has a key role to play in preventing the extinction of African elephants. The illegal ivory trade impacts wildlife tourism economically, not to mention the tragic deaths of park rangers. The global support for closing ivory markets is clear, 183 countries/territories of CITES are unified in closing domestic markets that contribute to poaching or illegal trade in ivory. There is no deterrent sentencing in Hong Kong with respect to wildlife crime, and penalties are minimal.

Secondly, I am strongly against any suggestion of compensation to traders. This would entirely defeat the purpose and has the obvious potential to set a dangerous precedent and signal to the industry that could in turn actually fuel the poaching of elephants. The ivory traders have been forewarned for 27 years to prepare and sell their ivory and they have an additional 5 year grace period once the legislation comes into force. Most traders do not rely on just ivory for their income. People who have speculated and stored ivory, can sell this ivory now, they do not need to be compensated (the proposed ban was announced 15 months ago and is not envisaged to be fully in place until December 2021). No other country has provided compensation and China will not do so when their ban comes into force at the end of this year. Compensation can motivate dishonest traders in Hong Kong to increase their ivory stock in the short term from illegal sources, before the ban becomes effective. Thus increasing future compensation payments and having a perverse impact i.e. fuelling poaching. This will also immediately send a signal to the illegal ivory trade that there is a finite period between the legislation passing and coming into force, where they can poach ivory to supply the Hong Kong trade - again, fuelling poaching. Public funds, should not be made available to any industries or trades which are adversely affected by changes in economic or commercial circumstances when they have been repeatedly forewarned over decades.

Kind regards,

Jonathan

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