



Hon. Chair Lady,
Panel of Environmental Affairs,
Legislative Council
Hong Kong SAR

E-mail: [REDACTED]

4 June 2017

Dear Hon. Chair Lady,

Re: Legislative proposal to phase out Hong Kong's trade in elephant ivory

Thank you, Madame Chair, for the opportunity of speaking at today's important meeting on phasing out the local trade in elephant ivory.

I had planned to make this intervention entirely my own, but yesterday I received a letter from three people who spent many years investigating the global movement of illegal ivory back in the 1980s and 1990s. What they have to say is of critical importance, so please allow me to begin by summarizing their points:

1. Hong Kong was at the very centre of the illegal trade in ivory during the 1980s
2. Hundreds of tonnes of poached ivory were laundered into the system en route from Africa, through the middle east and on to Hong Kong.
3. Ivory traders in Dubai, Ajman, Singapore, Taiwan and South Africa were interviewed in 1988 and 1989, and all stated that their illegal ivory was destined for Hong Kong
4. Fake CITES certificates could be bought in Hong Kong for as little as five British pounds.
5. Customs agencies generally estimate that they intercept 10% of illegal wildlife shipments. Given that Hong Kong has seized around 35 tonnes of ivory since 2003, we can safely estimate that 350 tonnes of illegal ivory have entered Hong Kong during that period.

Turning now to my own points, Madame Chair, I would like to draw your attention to Tanzania's proposal to uplist the African elephant from Appendix II to Appendix I, tabled at the seventh meeting of CITES in October 1989.

The proposal was adopted by the Parties, and resulted in an immediate drop in elephant poaching and ivory smuggling.

Tanzania's 1989 proposal strongly contradicts the narrative touted by the Hong Kong ivory traders today, in which they claim that their pre-1990 ivory stocks are all legal and taken from elephants that died of natural causes.

The Tanzanian proposal states that:

1. "There has been a very spectacular increase in the total number of elephants killed to supply the ivory trade. The present offtake was considerably above the maximum sustainable yield."

2. "The illegal trade in ivory is massive and often difficult to separate from the legal trade. Document falsification, and forgery are reportedly common practice, often concealing ivory's true origin."

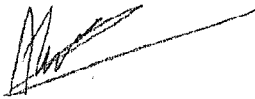
3. "If one assumes that the total ivory traded outside Africa in 1987 was around 691 tonnes (771 tonnes minus 80 tonnes consumed in Africa), then approximately 94 percent of the ivory originated from illegal sources."

4. "CITES is in fact facilitating the continuing unsustainable offtake of elephants by allowing for very large amounts of ivory from poached elephants to enter the legal international trade."

[End quotes]

The ivory traders have been deceiving Hong Kong and the rest of the world since the 1980s and must not be allowed to continue doing so. Enough is enough. Let's consign Hong Kong's ivory trade to the dustbin of history where it belongs.

Yours sincerely,



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cf. attached: 'Tanzania Proposal to uplist the African elephant from Appendix II to Appendix I CITES CoP7'

AMENDMENTS TO APPENDICES I AND II OF THE CONVENTION

A. Proposal

Transfer of the African elephant (Loxodonta africana) from Appendix II to Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

B. Proponent

United Republic of Tanzania.

C. Supporting Statement

1. Taxonomy

- | | |
|---------------------|---|
| 11. Class | Mammalia |
| 12. Order | Proboscidea |
| 13. Family | Elephantidae |
| 14. Scientific Name | <u>Loxodonta africana</u>
(Blumenbach, 1797) |
| 15. Common Names | English: African Elephant
French: Elephant d'Afrique
Portuguese: Elefante africano
Spanish: Elefante africano
German: Afrikanischer Elefant |

Western and Central Africa

Peuhl: N'jaomba, Gnioua
(Cameroon)
Mossi: Ouabogou
Ouolof: Niei
Bambara: Sama
Bete: Lo
Sohrai: Tarkouada
Dioula: Sama
Toubou: Koum
Toucouleur: Gniva
Mandingu: Samon
Baoule: Sui or Sui-koffi
Fon: Adjinakou
Ewe: Atigbigen
Mina: Atigbigen
Cotocoli: Tou

or less constant demand (from an estimated 42,783 in 1979 to 82,814 in 1987; see Table 5).

Based on Customs and elephant population trend data, Caughley (1988) estimated that the total ivory yield had been slightly but consistently increasing during the mid-1970's and 1980's, averaging just above 1,000 t per year. If these data are combined with the decreasing individual tusk weight, then there has been a very spectacular increase in the total number of elephants killed to supply the ivory trade. Caughley (1988) concluded that the present offtake was considerably above the maximum sustainable yield.

In addition, the offtake has been largely unauthorized, i.e., most of the tusks contributing to both the legal and illegal ivory trade come from elephants who have been killed by poachers. As an example, of the 31,597 tusks exported under the Ivory Control System in 1987, a minimum of 23,242 or 74 percent were confiscated from poachers (Ivory Notification No. 26; R.V.H. Bell, pers. comm.; R. Dipouma, pers. comm.; A. El. Moghraby, pers. comm.). If one assumes, as suggested by Parker (in prep.), that the total ivory traded outside Africa in 1987 was around 691 t (771 t minus 80 t consumed in Africa), then approximately 94 percent of the ivory originated from illegal sources. Parker (in prep.) supports this argument by stating that the greatest supply of "official" ivory, that is tusks held by governments, is seized contraband. Caughley (1988) concluded that the unauthorized offtake presently far exceeds the species' maximum sustainable yield, i.e., CITES is in fact facilitating the continuing unsustainable offtake of elephants by allowing for very large amounts of ivory from poached elephants to enter the legal international trade.

Another factor that has characterized the ivory trade during the past two decades is the growth in ivory price. From 1960 to 1969, the international price of raw ivory changed little, averaging US\$ 5.45 per kg. In 1970, however, it jumped to US\$ 7.44 per kg and went on climbing to a peak of US\$ 74.42 per kg in 1978 (Parker, 1979). The price dropped to US\$ 52.80 per kg in 1982, but has since risen to over US\$ 100 per kg in 1987 (Douglas-Hamilton, 1987a) and was close to US\$ 200 by 1988 (J. Thomsen, pers. comm.). The rises in price have been greatly in excess of inflation and at no time since 1973 has the real value (less inflation) been less than three times its average for the 1960's (Douglas-Hamilton, 1987a). Figure 27 presents the average annual raw ivory values for the period 1978 to 1987 based on data from Hong Kong, Japan and Singapore.

The reasons for the rise in the international ivory price are not fully understood, although it has been suggested that investors were attracted to ivory as a wealth store in a time of high inflation (Douglas-Hamilton, 1987a). However, the

estimate their total consumption during this period. Figure 28 shows the combined minimum trade reported by Hong Kong (CITES Annual Reports) and Japan (Customs statistics). The data show a market decrease since 1984, which, perhaps, is more a reflection of an increased incentive to smuggle ivory as a result of the increased bureaucracy associated with the ivory trade, rather than an actual decrease in demand (c.f., Parker, in prep.).

323. Skin Trade

The trade in skins from African elephants has been analyzed by Thomsen (1988a) based on imports by the United States. Apparently, this country is the main end market for elephant skins, importing an average 500,000 sq/feet of skins annually. The main source of these skins is Zimbabwe, but other countries, namely South Africa and Botswana, contribute to this trade. The skins have all been derived from culling operations, and the majority are manufactured in the United States by the Texas boot industry.

33. Illegal Trade

The illegal trade in ivory is massive, and often difficult to separate from the legal trade. Document falsification and forgery are reportedly common practice, often concealing ivory's true origin (Caldwell & Barzdo, 1985). It is generally recognized, however, that a very large proportion of the annual world trade in ivory is traded completely outside of the trade controls provided by CITES (AERSG, 1987). Annual reports submitted to the CITES Secretariat attest to this. A comparison of CITES ivory trade figures and Customs figures suggests that large amounts of ivory went undetected by the CITES permit system, and more recently by the CITES Ivory Control System (Caldwell, 1984; 1987; 1988; Parker, in prep.). AERSG (1987) estimated that legal exports of ivory only accounted for 22 percent of the trade in 1986. In 1987, the legal ivory exports recorded under CITES may have accounted for only 30 percent of the trade (AERSG, 1987; WTMU, unpubl.; I. Parker, pers. comm.). The 1987 ivory trade between Tanzania and Taiwan illustrates this point (Table 7). Under the CITES Ivory Control System, Tanzania did not authorize any ivory exports to Taiwan. However, Taiwan's Customs officials reported importing more than 50 t of ivory from Tanzania (Taiwan Customs Statistics), all of which left Tanzania illegally.

Large volumes of ivory are apparently traded in violation of individual countries' domestic legislation as well as international controls. Ivory originating in countries with partial or complete export bans continues to flow into international markets. Reports by Caldwell (1984; 1987)