



**Support of the Hong Kong SAR government's proposal to ban the import, re-export and possession of pre-Convention ivory for commercial purposes and to increase penalties for wildlife crime**

David Stanton to: panel\_ea

02/06/2017 17:06

Cc: info, dphk, bpa, contact, liberal, info, info, info, kwaichung, info, flucsb, lsd, info, info

Dear Sir/Madam

Please find attached a letter to demonstrate aec Ltd's support for the proposal to ban the import, re-export and possession of pre-Convention ivory for commercial purposes and to increase penalties for wildlife crime.

This industry has no place in the 21st century and Hong Kong should not be tarnished with the reputation as the world's largest ivory city market, responsible for the deaths of over 20,000 elephants each year along with over 100 rangers who lose their lives annually in line of duty to protect wildlife.

Yours sincerely

David Stanton

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David Stanton

Director

<<...>>

aec Ltd.

[Redacted address line]

Yuen Long, New Territories, Hong Kong

T +852 [Redacted] | M [Redacted] | F [Redacted]



djs@aechk.hk | www.aechk.hk | Ivory Ban Support - aec Ltd - 20170602.pdf

**Clerk or Chairman (Hon. Tanya Chan) of the LegCo Environmental Affairs Panel**

**email:** [panel\\_ea@legco.gov.hk](mailto:panel_ea@legco.gov.hk)

**Re: HKSAR Governments Ivory Ban**

Dear Sir/madam

We write as **aec ltd.**, Hong Kong's largest independent ecological consultancy, in support of the Hong Kong SAR government's proposal to:

- ban the import, re-export and possession of pre-Convention ivory for commercial purposes, and;
- to increase penalties for wildlife crime

The Convention on International Trade in Endangered Species of Wild Fauna and Flora banned the international trade of ivory in 1989. There has been over 25 years for ivory traders to get their house in order. We have little sympathy for this barbaric trade.

With regards to supporting the ban of the import of ivory, evidence shows 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. If nothing is done, the African elephant populations in the wild will become extinct in our lifetime.
- The illegal ivory trade impacts wildlife tourism economically, not to mention the tragic deaths of park rangers annually.
- 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.
- This is an arcane trade and has no place in the 21<sup>st</sup> century.




**aec Ltd. does not support proposals for any compensation to ivory traders:**

- 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. fueling 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 in to force, where they can poach ivory to supply the Hong Kong trade - thus again fueling 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.

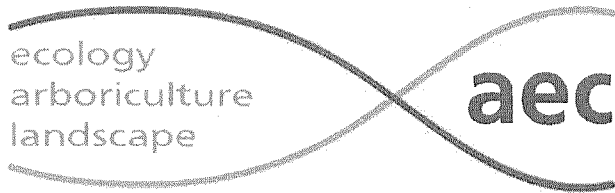
Every year, not only over 20,000 elephants are killed for their tusks. Furthermore, over 100 rangers have lost their lives annually in line of duty to protect wildlife.

Hong Kong is the world's largest ivory market and it is time to rectify the Territory's tarnished reputation. Hong Kong needs to show itself to be a leader in the conservation of these iconic species' and repair its image with regards to wildlife trade.

Yours sincerely



David Stanton  
Director  
for and on behalf of  
AEC Ltd.



127 Commercial Centre, Palm Springs  
Yuen Long, New Territories, Hong Kong  
T 852 2486 2885 | F 852 2471 8389  
aec@aechk.hk | www.aechk.hk

**CC:**

Democratic Alliance for the Betterment and Progress of Hong Kong  
The Democratic Party 民主黨  
Business and Professionals Alliance for Hong Kong  
Civic Party 公民黨  
Liberal Party 自由黨  
New Territories Association of Societies  
New People's Party 新民黨  
Professional Commons 公共專業聯盟  
Neighbourhood and Worker's Service Centre 街坊工友服務處  
Labour Party 工黨  
Federation of Hong Kong and Kowloon Labour Unions  
League of Social Democrats  
Demosisto of 香港眾志  
New Century Forum 新世紀論壇

[info@dab.org.hk](mailto:info@dab.org.hk)  
[dphk@dphk.org](mailto:dphk@dphk.org)  
[bpa@bpahk.org](mailto:bpa@bpahk.org)  
[contact@civicparty.hk](mailto:contact@civicparty.hk)  
[liberal@liberal.org.hk](mailto:liberal@liberal.org.hk)  
[info@ntas.org](mailto:info@ntas.org)  
[info@npp.org.hk](mailto:info@npp.org.hk)  
[info@procommons.org.hk](mailto:info@procommons.org.hk)  
[kwaichung@nwsc.org.hk](mailto:kwaichung@nwsc.org.hk)  
[info@labour.org.hk](mailto:info@labour.org.hk)  
[flucsb@hkflu.org.hk](mailto:flucsb@hkflu.org.hk)  
[lsd@lsd.org.hk](mailto:lsd@lsd.org.hk)  
[info@demosisto.hk](mailto:info@demosisto.hk)  
[info@ncforum.org.hk](mailto:info@ncforum.org.hk)

