

June 2 2017

To: The Honourable Panel on Environmental Affairs  
Legislative Council, Hong Kong Special Administrative Region

**Re: Legislative proposal to phase out the local ivory trade**

Dear Members of the Panel,

I am writing to express my support for (1) phasing out of the local ivory ban and (2) opposing compensation to the ivory traders. My reasoning as follows:

**(1) Phasing out the local ivory trade**

Hong Kong is one of the key transit ports for illegal ivory smuggled from Africa. There were 25 reported cases of ivory seizure by Hong Kong Custom between 2010 and 2016. More, Hong Kong Customs burned 32.6 tonnes of confiscated raw ivory tusk, the largest recorded ivory stockpile in 2014. This stockpile was an accumulation of ivory from different seizures at the Hong Kong borders since 2003.

As of today, traders can only legally sell ivory if they were sourced from the pre 1989 convention ban and have registered with AFCD. However, there are great flaws in this as documented by a range of non – governmental reports. 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.

**(2) Opposing compensation to the ivory traders**

Compensating ivory traders is an unsound proposal, reasons as follow:

First, the traders have had since 1989 to sell off their remaining ivory stock and they will have another 5 years grace period before the legislation comes into force. Further, by offering compensation to ivory traders, we are conveniently attaching a price label to ivory which may well worsen the devastation that our remaining elephants are already facing. Attaching a monetary value is sending a message to the world that ivory is a commodity. This is dangerous and inaccurate.

Second, how can the government enforce the compulsory purchase scheme and to be sure that they are compensating ivory traders with legally commercial stockpile? A compulsory purchase scheme may invite traders in the black market to transfer their illegal ivory to a registered ivory outlet in order to receive compensation.

Third, a compulsory purchase scheme may eliminate the circulation of ivory in Hong Kong but does little to reduce the demand for ivory. Termed as the ‘white gold’, possession of ivory products is a demonstration of one’s financial power and status and a form of investment. As long as there is a continuing demand of ivory, criminals will have incentives to sell ivory in the

black market. The key issue for tackling ivory trade is not to control the legal ivory but to reduce demand and one such way is to increase the relevant penalties on illegal wildlife trafficking in Hong Kong.

Fourth, how can the government determine the value for each kg of ivory? This is a difficult exercise since no country to date has provided any form of compensation to ivory traders.

The ban is long overdue and the Hong Kong government should implement the ban with no compensation to the traders **as soon as possible**.

Yours sincerely,

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