



Hon. Tanya Chan  
Chairman  
LegCo Environmental Affairs Panel  
[panel\\_ea@legco.gov.hk](mailto:panel_ea@legco.gov.hk)

Dear Chairman Hon. Tanya Chan,

As a biodiversity conservation foundation based in the UK, Synchronicity Earth would like to express our **support of the Hong Kong 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.**

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. It is our understanding that the current legal trade in Pre-Convention ivory in Hong Kong has provided a front for laundering of illegal ivory, adding to the continued decimation of wild elephant populations. This is exacerbated by the fact that without expensive scientific analysis it is impossible to distinguish legal Pre-Convention ivory from illegal ivory from poaching. 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. It is our understanding that there is no deterrent sentencing in Hong Kong with respect to wildlife crime and penalties are minimal. This must change if this damaging trade is to be stopped.

**Furthermore, we do not support proposals for any compensation to ivory traders.**

It is our understanding that 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. These traders have therefore had ample time to legally sell ivory stocks without the need for compensation. There is a clear worry that compensation might 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. Additionally, no other country has provided compensation and China will not do so when their ban comes into force at the end of this year.

The imposition of an ivory ban in Hong Kong, along with an increase in penalties for all wildlife crime, will be an incredible step in curbing the devastation of populations of elephants, as well as the numerous other species severely affected by wildlife crime. We urge you to support the ivory ban and increase of penalties for wildlife crime, and to stand against proposals for compensation to ivory traders.

Sincerely,

Laura Miller

A handwritten signature in black ink, appearing to be "LM", written over a light blue horizontal line.

Executive Director