



ENVIRONMENTAL INVESTIGATION AGENCY, UK (EIA) BRIEFING REGARDING ELEPHANT AGENDA ITEMS FOR THE 66TH MEETING OF THE CITES STANDING COMMITTEE (JANUARY 2016)

A. AGENDA 47 - ELEPHANTS: DECISION-MAKING MECHANISM FOR AUTHORIZING IVORY TRADE (DMM)

EIA is concerned that despite the ongoing elephant poaching crisis in Africa, the Decision Making Mechanism (DMM) continues to be discussed under CITES. Decision 14.77 to develop the DMM was originally adopted almost a decade ago, and renewed at CoP16 through Decision 16.55. During this period, **there has been an unprecedented escalation in poaching and illegal ivory trade and the landscape has vastly changed since 2007 when the decision to develop a DMM was originally adopted.**

The ETIS report to SC66 continues to show record levels of illegal ivory and notes the increasing frequency of large-scale ivory seizures with 2013 holding the record for the highest number large-scale illegal ivory seizures. EIA's records also confirm that there have been at least 12 large-scale seizures totalling nearly 19 tonnes during 2015 and at the time of writing, publicly available information suggests that none of these seizures have been followed-up with enforcement efforts such as convictions of major traffickers involved and coordinated disruption of transnational criminal networks.¹

A recent scientific study concluded that 100,000 elephants were killed illegally between 2010 and 2012, at an average of 33,630 (6.8% of the total population) each year.² Elephant populations grow at approximately 4.2% per year in the absence of poaching - therefore current off-take currently exceeds the intrinsic growth capacity of the species in the affected populations and is unsustainable.

At SC65, a decision was adopted requesting that the CITES Secretariat, in collaboration with the Secretariat of UNEP, prepare a "background document" and make it available to the DMM Working Group by January 2015 at the latest, extended to May 2015. **However the background document produced for this meeting of the Standing Committee, SC66 Doc. 47.4.1 Annex, has been prepared without any consultation with the DMM Working Group and African and Asian elephant range states and was only made publicly available in November 2015.**

EIA supports the recommendation in the proposal put forward by Benin, Burkina Faso, Ethiopia and Kenya (two of these Parties, namely Burkina Faso and Kenya, are members of the DMM Working Group), SC66 Doc. 47.4.2, to suspend any further discussion of the DMM and to instead focus on developing measures to significantly reduce elephant poaching and trade in, and demand for, ivory.

EIA *recommends* that the Standing Committee adopt the recommendation in the proposal put forward by Benin, Burkina Faso, Ethiopia and Kenya in SC66 Doc. 47.4.2.

B. AGENDA 47.1 - ELEPHANT CONSERVATION, ILLEGAL KILLING AND IVORY TRADE

The Secretariat's report, SC66 Doc. 47.1, reports on progress made in implementing relevant CITES recommendations. EIA commends the Secretariat and other ICCWC members for progress made towards strengthening the enforcement efforts to address the illegal ivory trade including development of the guidelines for forensic analysis of ivory samples, capacity building for use of controlled deliveries and ongoing development of an anti-money-laundering programme.

SC66 Doc. 47.1 confirms the continuing decline of elephant populations and record levels of illegal ivory trade. It is pertinent to note that the data and analysis for the years 2014 and 2015 are yet to be completed.

IUCN reports that between 2006 and 2013, the African elephant population has declined from approximately 550,000 to 470,000, and that small populations are being lost. Botswana continues to hold the largest population with over 100,000 elephants. Although the report states that the second largest elephant population is in Zimbabwe, EIA cautions that this estimate is largely based on outdated data from 2006-2007³ and that Zimbabwe has had several mass poaching incidents in recent.⁴

IUCN's findings relating to elephant population decline are also corroborated by the MIKE report which concludes that while poaching levels seem to be stabilizing across MIKE sites, overall they remain unsustainable. The MIKE report also notes concern about elephant poaching incidents in MIKE sites in Kruger National Park (South Africa) and two sites in Zimbabwe.

The ETIS report continues to show record levels of illegal ivory and notes the increasing frequency of large-scale ivory seizures with 2013 holding the record for the highest number large-scale illegal ivory seizures. It is generally acknowledged that large-scale seizures are an indicator of the involvement of organised crime in ivory trafficking. Although the ETIS report observes a decreasing trend in large-scale seizures in 2014, the years 2014 and 2015 are data deficient and have not been included in the full ETIS analysis.

Implementation of Decision 16.83 (forensic analysis of large-scale ivory seizures)

Based on EIA records, between 2010 and the end of November 2015, there have been at least 77 large-scale ivory seizures totalling nearly 139 tonnes of ivory.⁵ The ETIS report to SC66 has identified at least 136 large-scale seizures between 2000 and 2014. However based on publicly available information, the majority of these seizures have not yet been subject to DNA analysis, nor have the results of such analyses been made publically available.

TABLE 1: Large-scale Ivory Seizures, 2010-2015*

Country/territory	PC/SC/ITW/NC**	Number of large scale ivory seizures between 2010 and end November 2015
Cambodia	ITW	1
Cameroon	SC	1
China (mainland)	PC	5
Hong Kong SAR	PC	11
Kenya	PC	11
Malawi	NC	1
Malaysia	PC	5
Mozambique	SC	1
Singapore	NC	3
Sri Lanka	NC	1
Tanzania	PC	4
Thailand	PC	7
Togo	NC	2
UAE	ITW	1
Uganda	PC	4
USA	NC	2
Vietnam	PC	17
TOTAL, 2010-2015		77

*Source: EIA-compiled records. **PC = Primary concern country; SC = Secondary concern country; ITW: Importance to watch country; NC: CITES Party that does not fall in any of the above three categories

According to a June 2015 scientific publication, DNA analysis conducted on 28 large scale seizures between 1996 and 2014 found that more than 85% of the savanna elephant ivory seized between 2006 and 2014 originated in East Africa, mainly from the Selous Game Reserve in southeastern Tanzania and the Niassa Reserve in adjacent northern Mozambique. It further noted that in 2011 the poaching epicentre began shifting northward toward the Ruaha National Park and Rungwa Game Reserve in Tanzania's central region, gradually creeping northward towards Kenya.⁶ In addition, the study found that more than 85% of forest ivory seized between 2006 and 2014 was sourced from the central African Tridom protected ecosystem.

According to the CITES Secretariat's report from SC65 in June 2014, SC65 Doc. 42.2, China has submitted a number of ivory samples to a lab in Germany; Kenya is undertaking DNA analysis of its seized ivory; Malaysia

had collected 253 ivory samples for DNA analysis as of November 2013; Uganda was considered to have substantially completed DNA analysis of its large scale seizures; and Vietnam was considered to have substantially completed DNA analysis of its large scale seizures by collecting samples from all ivory seizures in preparation for analysis.

Based on EIA-compiled records, CITES Parties that have made large-scale ivory seizures are identified in Table 1. Whether the Parties identified below have conducted DNA analysis on all of their large-scale seizures remains unclear. Of note, a small country with limited resources namely, Togo, has conducted DNA analysis for both its large-scale seizures.⁷ In addition, Malawi and Sri Lanka have also conducted DNA analyses for the single large-scale ivory seizure that have taken place within each of these countries.⁸

In light of the scale of the poaching crisis in Africa, the range of stakeholders and the significant level of investment in combating ivory trade in Africa, **the results of the DNA analysis for ivory seizures, where conducted, must be made publicly available to enable a robust and transparent dialogue and identification of strategies to tackle poaching and trafficking.**

Stockpiles

Regarding stockpiles, the Secretariat's report notes that 24 Parties have submitted information on stockpiles since SC65 and that the total amount declared by these Parties is well over 100 tonnes of ivory, although a country-breakdown of stockpiles has not been provided. EIA recommends that a country-breakdown of stockpiles be made publicly available exclusive of any sensitive information such as location of the stockpiles.

The Secretariat's report also notes the lack of external funding for the production of guidance on management of ivory stockpiles: EIA recommends that the Standing Committee focus on the destruction of stocks as best practice rather than adopt a decision that involves more time and funding spent on this matter. Moreover since 2012, several Parties have already adopted best practice and destroyed their stockpiles, including: Gabon, Kenya, Philippines, the United States, Chad, France, mainland China, Hong Kong, Belgium, Ethiopia, Republic of Congo, and the United Arab Emirates. **Ivory stockpile thefts continue to take place (for example in Tanzania, Zambia, Mozambique, Botswana, Gabon, and Uganda) and combined with other factors such as corruption, the involvement of organised crime in ivory trafficking, the high costs associated with securing stockpiles and the lack of capacity and resources in many countries to secure stockpiles, EIA recommends that the Standing Committee encourage Parties to destroy their ivory stockpiles.**

EIA *recommends* that the Standing Committee adopt the following recommendations:

1. Regarding implementation of Decision 16.83:

a) Request all Parties involved in large scale ivory seizures (i.e. 500 kg or more), including Cambodia, Cameroon, mainland China, Hong Kong, Kenya, Malaysia, Mozambique, Singapore, Tanzania, Thailand, UAE, Uganda, and Vietnam, to conduct forensic analysis to determine the origin of the seized ivory, and to share the results of the analysis with the CITES Secretariat; and

b) Direct the Secretariat to make the results of the forensic analysis publicly available on the CITES website;

2. Regarding large-scale ivory seizures: Request all Parties implicated in large-scale ivory seizures to provide information for the consideration of CoP17 on progress made in following-up on the seizures, including the results of the forensic analysis of ivory samples, arrests and prosecution of offenders, and co-operation with source, transit and destination countries;

3. Regarding stockpiles: Encourage Parties to destroy their ivory stockpiles following independent inventory and audit and DNA analysis for investigations; and

4. Regarding population estimates: Encourage all African elephant Range States to co-operate with appropriate stakeholders and initiatives such as the Great Elephant Census to conduct scientific elephant population surveys

C. AGENDA 29 - NATIONAL IVORY ACTION PLANS PROCESS

Poaching of African and Asian elephants and ivory trafficking continues at an alarming rate. From a preliminary analysis of seizures made in 2015, over 23 tonnes of ivory have been seized in 2015, equivalent to just under 3,500 dead elephants; this includes 12 large-scale seizures totalling almost 19 tonnes.⁹ It appears that CITES Parties and the Secretariat increasingly consider the National Ivory Action Plans (NIAPs) to be the primary CITES mechanism for tackling illegal trade in ivory. However, EIA continues to have serious concerns regarding the transparency, content and implementation of the Plans.

Lack of transparency

Although a CITES Ivory Action Plans portal has been established on the CITES website, this does not contain the NIAPs of the primary concern countries. Further, some countries have submitted revised NIAPs; however none of these Parties have provided the Secretariat with a mandate to make their revised NIAP publicly available. Given that the action plans of the secondary concern countries, and the 'importance to watch' countries have been published on the portal, there is no justification for withholding similar plans and revised plans submitted by the primary concern countries.

Indicators to assess implementation

Whilst some of the commitments made in the action plans are commendable, by their very nature they constitute self-imposed benchmarks and criteria and vary widely in terms of effectiveness. Therefore at its 65th meeting, the Standing Committee adopted a recommendation directed at the eight primary concern countries: *"to review and, as necessary, revise their NIAPs, including the milestones and timeframes and, where possible, to include indicators to measure the impacts of actions in the NIAPs (e.g. through **data on elephant poaching levels; number of ivory seizures; successful prosecutions; progress on paragraph d) under "Regarding trade in elephant specimens" of Resolution Conf. 10.10 (Rev. CoP16); and changes to legislation**), based upon any new identified needs and these Parties' own evaluations of progress."*¹⁰

It does not appear that any Party has reported on the impacts of their NIAPs using the indicators identified at SC65.

Further, there is no independent third party assessment of the implementation of the NIAPs (such as an independent review by ICCWC) and the implicated Parties have simply been requested to conduct self-assessments and assign each NIAP action a progress rating of 'substantially achieved', 'on track' for achievement, 'challenging' or 'unclear' – which in many instances has resulted in inaccurate ratings.

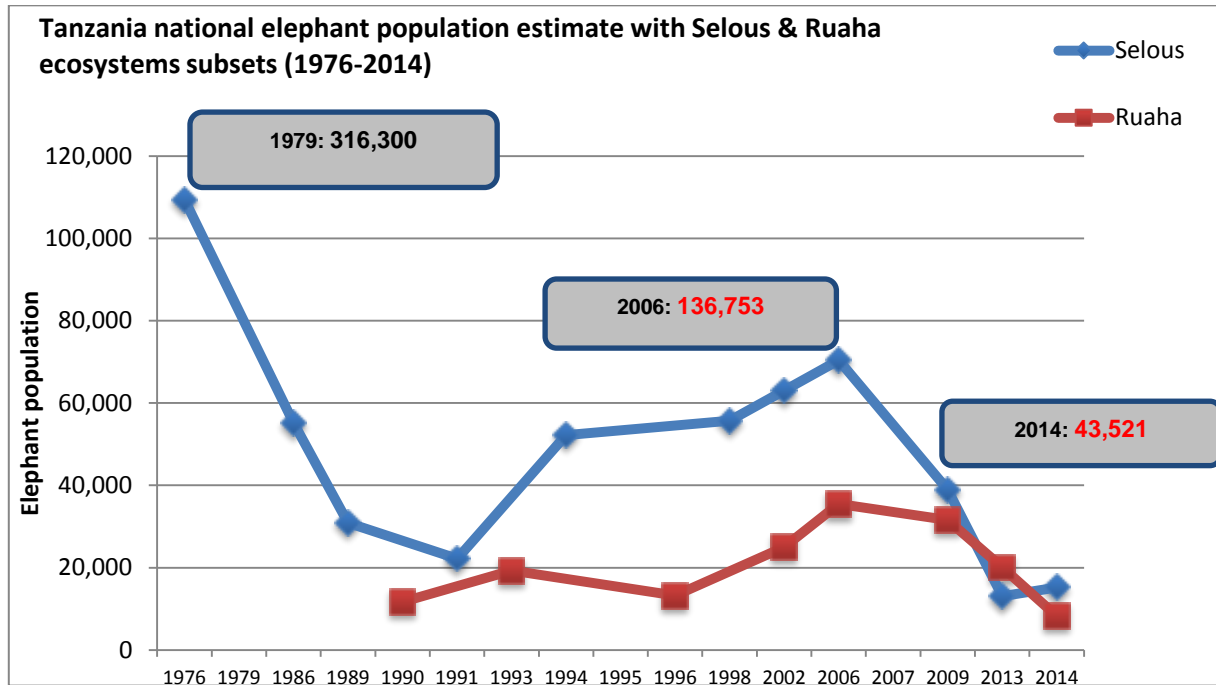
In light of the varied quality of the NIAPs, and in the absence of an independent assessment of the implementation of the NIAPs, EIA is concerned that the Secretariat's report, SC66 Doc. 29, concludes that over 98% of actions across the nine NIAPs of primary concern countries have been either 'substantially achieved' or 'on track' for achievement and that almost three quarters of actions (72%) are considered to be 'substantially achieved'. The Secretariat's report, SC66 Doc. 29, also concludes that mainland China, Hong Kong, Kenya, the Philippines, Thailand and Vietnam have 'substantially achieved' their NIAPs. There remain, however, a number of concerns about the progress made by these countries in combating ivory trade.

While the required measures that need to be implemented under the NIAPs will vary depending on the country specific challenges, the criteria used to review the progress made under the NIAPs should nonetheless be consistent. In this regard, EIA notes that the Secretariat's report on ICCWC, SC66 Doc. 16.5, states that ICCWC is in the process of finalizing the development of indicators which Parties could implement to assist them to measure and monitor the effectiveness of their law enforcement responses to wildlife and forest crime. EIA recommends that the Standing Committee consider the integration of the use of some/all of the ICCWC indicators of effective law enforcement within the NIAP process.

Country-specific comments

Tanzania (primary concern country):

Tanzania has **lost more than 60% of its elephants** over 5 years - from more than 100,000 elephants in 2009 to approximately 40,000 elephants in 2014.¹¹ In light of the rapid elephant population decline in Tanzania, its NIAP does not go far enough to strengthen its enforcement efforts to effectively address all stages of the ivory trade chain.



Data from ivory seizures that have taken place around the world, which include Hong Kong, Vietnam, the Philippines, Malaysia, Sri Lanka, Taiwan, Singapore, Malawi and Uganda, implicate Tanzania as the source of more large consignments of ivory than any other country. In February 2014, INTERPOL concluded that a significant portion of ivory reaching Asian markets was derived from Tanzania's elephants.¹²

Tanzania has recently undertaken commendable enforcement efforts resulting in the arrest of at least four individuals implicated in ivory trafficking,¹³ however EIA notes with concern that cases concerning major ivory seizures continue to languish in Tanzania's court system with EIA's research showing that at the time of writing, only one individual has so far been convicted since 2009 out of 13 cases involving 26.5 tonnes of ivory and implicating several individuals and companies.¹⁴

Publicly available information suggests that Tanzania has not conducted DNA analysis for any of the 4 large scale ivory seizures that have taken place within its borders, which amount to a total of around 7,798 kg (equivalent to nearly 1,164 elephants killed).

Tanzania's progress report states that it has "verified and updated its ivory stockpile", however Tanzania has failed to publish an inventory of its ivory stock or destroy any of its stockpile. From publicly available government information submitted to CITES in 2012, **Tanzania has stockpiled approximately 137 tonnes of ivory.**¹⁵ Despite its commitment under the Elephant Protection Initiative to "put all stockpiles beyond economic use" - and the report of Tanzania's Auditor General which documented mismanagement of the ivory stockpile and tusks missing from the stockpile - Tanzania has still not taken steps to conduct forensic analysis to identify origin or consolidate and destroy its stock.

Lastly, while Tanzania's NIAP commits to adopt CITES Implementation Regulations for Zanzibar, such regulations have not been adopted.¹⁶

Lao PDR (importance to watch country):

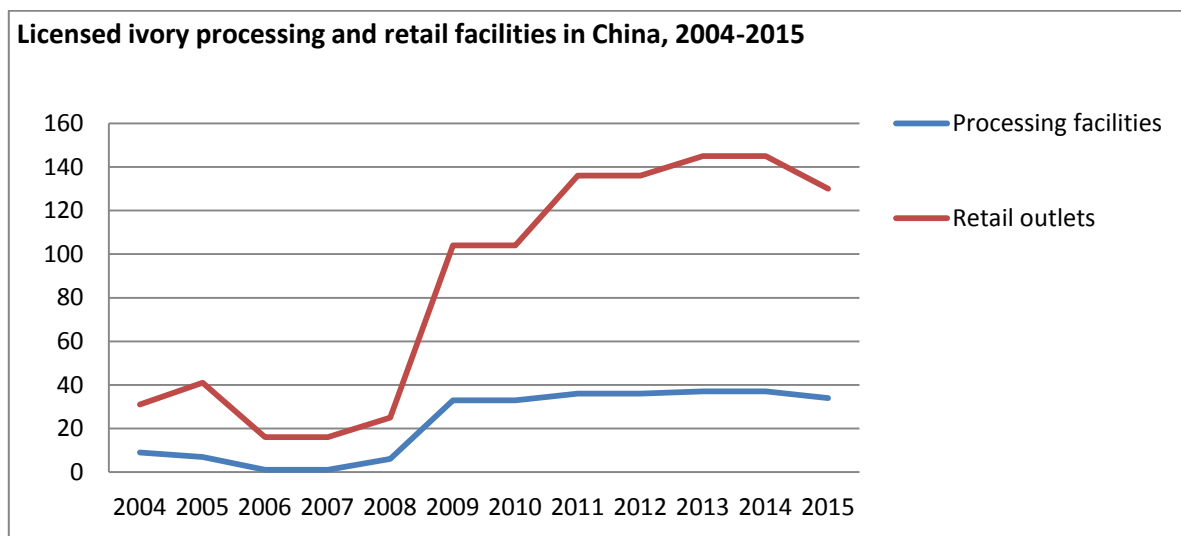
Lao PDR's NIAP does not address several key concerns and the country continues to play a significant role in the ivory trade. For example, its NIAP does not commit to amending existing law to prohibit legal domestic trade in elephant ivory, which is a major legal loophole.

The NIAP appears to suggest that there is no significant domestic market for ivory in Lao, however ivory is openly available for sale in Lao PDR.¹⁷ A 2014 study conducted by UNODC on the "Criminal Justice Responses to Wildlife and Forest Crime in Lao PDR" found that several recent reports have identified a large market for the sale of ivory in Laos¹⁸. According to the UNODC study, not a single wildlife related case has been referred to prosecution in Lao PDR.¹⁹

Lao PDR has been implicated in the seizure of at least 11 tonnes of ivory outside its territory between 2010 and 2015, including over 7 tonnes in Thailand in 2015 en route to Lao PDR.²⁰ The ETIS report to SC66 notes that Lao PDR has not submitted a single elephant product seizure report to ETIS and, based on publicly available information, it has, in the main, not seized any illegal ivory within its borders.²¹ Furthermore there is increasing evidence that processed ivory is travelling from Lao into China.²²

Mainland China (primary concern country):

China is the world's largest destination market for illegal ivory.²³ **While EIA welcomes China's high-level statements to close down its domestic legal ivory market, its NIAP progress report, SC66 Doc. 29 Annex 3, does not provide a time frame for implementing this commitment.** Since 2008, there has been a sharp and significant increase in China in the number of ivory carving factories and ivory retail stores. As of May 2015, 34 carving factories (13 of which are also allowed to sell ivory products on-site) and 130 retail outlets were legally registered to process and/or sell ivory sourced from the 2008 one-off CITES auction (see chart below).²⁴ A wealth of evidence is available to show that the domestic ivory market in China is perpetuating illegal trade in ivory – for example in 2013, the owner of a licensed ivory carving factory, was convicted for smuggling a total of 7.7 tonnes of ivory from Africa to China.²⁵



In addition, China has made at least 5 large scale ivory seizures between 2010 and November 2015, however it remains unclear whether all of these seizures have been subject to forensic analysis to identify origin.

Hong Kong (primary concern country):

Hong Kong's commitments under its NIAP are broad with no specific time-bound actions and measurable indicators to address the crucial role played by Hong Kong in international ivory trafficking. EIA is therefore concerned that the Secretariat's report, SC66 Doc. 29, inaccurately concludes that Hong Kong has fully implemented 100% of the actions in its NIAP.

Hong Kong continues to play a significant role in ivory trafficking - approximately 33 tonnes of illegal ivory was seized in Hong Kong between 2000 and 2013.²⁶ Hong Kong has made at least 11 large scale seizures between 2010 and November 2015.²⁷ **However it is unclear where these seizures have been followed-up**

with prosecutions and convictions in relation and evidence of sustained disruption and reduction of criminal activity is lacking.

Further, Hong Kong's NIAP committed to implementing a stringent licensing system for ivory trade. Recent investigations, however, have exposed Hong Kong as the city with the world's largest legal ivory retail market with an ivory licensing system which is fraught with significant loopholes enabling ivory trafficking.²⁸ The NIAP of Hong Kong does not contain any time bound commitments to end the domestic ivory trade.

Thailand (primary concern country):

In its NIAP submitted in 2013 Thailand committed to revising its laws to close down its domestic ivory market. In its revised NIAP submitted on September 30, 2015, it appears that Thailand has now changed its commitments and is now focusing on adopting measures geared towards *regulating* a legal domestic internal trade, rather than *closing* its domestic market, which has been repeatedly found to be abused by traders to sell illegal ivory.²⁹ It does not appear that Thailand has the resources or capacity to conduct DNA analysis on the certified ivory products to test whether the ivory is legal or illegal and the system appears to be flawed.

This is a major concern because Thailand plays a key role in ivory trafficking and has been the site of at least seven large scale seizures since 2010, totalling over 14 tonnes of ivory, including consignments heading for neighbouring Lao PDR.

Japan (importance to watch):

Japan is a major ivory market that has not been required to submit a NIAP (along with Qatar and UAE) of the 22 countries listed as primary concern, secondary concern and 'importance to watch' countries. Japan is on the 'importance to watch' list which is on the lowest tiers of concern for CITES.

However, recent EIA investigations have documented how Japan's ivory trade control system is plagued by loopholes and undercut by weak legislation to such an extent that no meaningful control exists at even the most basic level.³⁰ Japan has consistently failed to enact major elements of Resolution Conf. 10.10 (Rev. CoP16) including: failing to mark raw tusks, failing to mark cut pieces of ivory 1 kg and 20cm in length or larger, and all together exempting cut pieces from meaningful control. Furthermore, Japan's whole tusk registration system fails to require proof of legal acquisition and origin, undercutting enforcement and making it impossible to prevent the laundering of illegal ivory onto the legal domestic market. Over 5,500 tusks were registered in the last four years alone in Japan with no evidence of legal proof of origin and acquisition required at the time of registration. Due to its lack of compliance with Resolution Conf. 10.10 (Rev. CoP16), EIA recommends Japan be moved higher up the list to a country of 'primary concern' and be required to submit a NIAP, which should include a time-bound commitment to adopt a ban on domestic ivory trade on an urgent basis and to cease further tusk registrations.

EIA *recommends* that the Standing Committee:

1. Direct the Secretariat to make publicly available on the CITES website the current National Ivory Action Plans of the primary concern countries;
2. Adopt a decision recommending that CoP17 re-categorise Lao PDR and Japan as primary concern countries and request that Japan submit a NIAP with a time-bound commitment to adopt a ban on domestic ivory trade on an urgent basis;
3. Request that the primary concern, secondary concern and 'importance to watch countries' review their NIAPs and include meaningful and tangible milestones with timeframes for implementation;
4. Urge Tanzania to adopt time bound commitments to revise relevant laws in Zanzibar and expedite prosecution of high-level ivory traffickers, including traders, transport companies and corrupt officials implicated in ivory trafficking;
5. Urge the adoption of a moratorium on domestic ivory trade in mainland China, Hong Kong, Thailand and Japan, where domestic ivory markets are perpetuating illegal trade in ivory or where licensed trade in ivory has facilitated illegal trade and has been used as a laundering mechanism for the trade in illegal ivory;
6. Urge China, Thailand and Vietnam to support and work together with Lao PDR to detect, investigate and apprehend the criminal networks using Lao PDR as a hub for trafficking ivory and other wildlife; and

7. Encourage the destruction of ivory stockpiles following independent inventory and audit and DNA analysis for investigations;

4. Request that the primary concern, secondary concern and 'importance to watch' countries report on progress made with evidence to measure the impact through specific indicators as identified in SC65 ("e.g. through data on elephant poaching levels; number of ivory seizures; successful prosecutions; progress on paragraph d) under "Regarding trade in elephant specimens" of Resolution Conf. 10.10 (Rev. CoP16); and changes to legislation");

5. Request that the CITES Secretariat, in collaboration with ICCWC, use the SC65 indicators - and any applicable ICCWC indicators of effective enforcement - along with any other relevant benchmarks to apply uniform and consistent criteria for assessment of progress made by the primary concern, secondary concern and importance to watch countries; and

6. Propose compliance measures, including trade suspensions, against those primary concern, secondary concern and 'importance to watch' countries that have failed to demonstrate significant progress by SC67.

¹ EIA-compiled records, including seizure and investigation in Jiangxi (late 2014-2015).

² George Wittemeyer et al (2014), *Illegal killing for ivory drives global decline in African elephants*, PNAS.

³ IUCN African Elephant Database (accessed December 9, 2015).

⁴ The Guardian (Oct. 2015), *Poachers poison 14 elephants in Zimbabwe national parks*,

<http://www.theguardian.com/world/2015/oct/06/poachers-poison-14-elephants-zimbabwe-national-parks>

⁵ EIA-compiled records.

⁶ SK Wasser et al. (June 2015), *Genetic assignment of large seizures of elephant ivory reveals Africa's major poaching hotspots*, Science, Science. DOI:10.1126/science.aaa2457.

⁷ *Id.*

⁸ *Id.*

⁹ EIA-compiled records, including seizure and investigation in Jiangxi (late 2014-2015) (using an estimate of 6.7 kg ivory)

¹⁰ SC65 Com. 7 and amended in document SC65 Sum. 10.

¹¹ Frankfurt Zoological Society (FZS), *FZS commits to support Tanzania in intensifying anti-poaching efforts as Great Elephant Census reveals rapidly declining elephant population*; Speech by the Minister for Natural Resources and Tourism, Hon. Lazaro S. Nyalandu for the Announcement of the Tanzania 2014 Elephant Census Results Arusha, Tanzania (June 1, 2015).

¹² INTERPOL (Feb. 2014), *Elephant Poaching and Ivory Trafficking in East Africa: Assessment for an Effective Law Enforcement Response*.

¹³ See, e.g., David Smith, The Guardian (Oct. 2015), *Chinese 'ivory queen' charged with smuggling 706 elephant tusks*,

<http://www.theguardian.com/environment/2015/oct/08/chinese-ivory-queen-charged-smuggling-706-elephant-tusks>.

¹⁴ EIA (Nov. 2014), *Vanishing Point – Criminality, Corruption and the Devastation of Tanzania's Elephants*, <http://eia-international.org/wp-content/uploads/EIA-Vanishing-Point-lo-res1.pdf>.

¹⁵ United Republic of Tanzania, CoP16 Prop. 11 (Dec. 2012, withdrawn).

¹⁶ CITES National Legislation Project, <https://cites.org/sites/default/files/eng/prog/Legislation/CITES-NLP+Table2-20years.pdf> .

¹⁷ EIA (March 2015), *Sin City: Illegal Wildlife Trade in Laos' Golden Triangle Special Economic Zone*.

¹⁸ UNODC (Oct. 2014), *Criminal Justice Responses to Wildlife and Forest Crime in Lao PDR*.

¹⁹ UNODC (Oct. 2014), *Criminal Justice Responses to Wildlife and Forest Crime in Lao PDR*.

²⁰ EIA compiled records.

²¹ SC 66 Doc. 47.1, Annex 1, p.24.

²² See, e.g., Mengla Customs ivory seizure, June 2015; Yunnan Border Police ivory seizure, 3 August 2015; see also EIA (March 2015), *Sin City: Illegal Wildlife Trade in Laos' Golden Triangle Special Economic Zone*.

²³ See, e.g., UNEP et al. (2013), *Elephants in the Dust – The African Elephant Crisis. A Rapid Response Assessment* at 40, 67; World Customs Organisation (2013), *Illicit Trade Report 2012* at pg. 49; TRAFFIC (2014), *Status of elephant populations, levels of illegal killing and the trade in ivory: a report to the CITES Standing Committee*, SC65 Doc. 42.1.

²⁴ State Forestry Administration (2015) SFA Notification (2015) No. 9, <http://www.forestry.gov.cn/main/72/content-764141.html> (Accessed September 2015).

²⁵ EIA (Feb. 2014), *In Cold Blood: Combating organised wildlife crime*, <http://eia-international.org/in-coldblood-combating-organised-wildlife-crime>.

²⁶ WWF-Hong Kong (Sept. 2015), *The Hard Truth: How Hong Kong's Ivory Trade is Fuelling Africa's Elephant Poaching Crisis*.

²⁷ EIA compiled records.

²⁸ *Id.*

²⁹ TRAFFIC (2014), *Polishing Off The Ivory: Surveys Of Thailand's Ivory Market*.

³⁰ EIA (2015), *Japan's Illegal Ivory Trade and Fraudulent Registration of Ivory Tusks*, <http://eia-global.org/news-media/fraudulent-tusk-registration-fuels-ivory-trade-in-japan>.



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