



EIA BRIEFING DOCUMENT ON AGENDA ITEM 42 ELEPHANTS FOR THE 65TH MEETING OF THE CITES STANDING COMMITTEE (GENEVA, JULY 7-11, 2014)

Please find below the comments of the Environmental Investigation Agency (EIA) on the provisional agenda items for the 65th meeting of the CITES Standing Committee (SC65). In addition to the comments enclosed herein, EIA as a member of the Species Survival Network (SSN) also supports and associates itself with the comments submitted by SSN. EIA's comments on SC65 agenda items regarding Elephants are as follows:

SC65 Doc. 42.1, Elephant Conservation, Illegal Killing And Ivory Trade

EIA notes with concern that the poaching of elephants remains at extremely high “*unsustainable*” levels with “*mortality exceeding the natural birth rate resulting in an ongoing decline in African elephant numbers*” and that the 18 large-scale ivory seizures made in 2013 collectively constitute the greatest quantity of ivory derived from large-scale seizure events since 1989.¹

Whilst the MIKE and ETIS data confirm the severity of the threat posed by trade to elephants, it is important to recognize that these figures are under-estimates based on incomplete data. The **actual level of illegal killing and trade is higher than the reported levels** for several reasons:

- data for both MIKE and ETIS for 2013 is incomplete;
- ETIS data for 2012 is also incomplete;
- MIKE has noted that there has been a reduction in the overall reliability of data in Southern Africa and in parts of Eastern Africa.²

The Center for Conservation Biology at the University of Washington, which is currently conducting DNA analyses of samples from large-scale ivory seizures, estimates that as many as **50,000 elephants are currently being killed annually** based on 46.5 tons of African elephant ivory seized in 2011.³

Further, **the legal domestic ivory market in China that was established based on approval by the CITES Standing Committee for the “one-off” sale of ivory to China in 2008 continues to provide a cover for laundering illegal ivory smuggled from Africa.** For example in 2013 news emerged that two licensed ivory dealers with authorized legal retail outlets in Fujian and Guangdong Provinces of China were prosecuted for smuggling and laundering nearly 9 tonnes of illicit ivory from Africa.⁴ The report submitted by ETIS to SC65⁵ again reiterates that China is a primary end-use destination for illegal ivory, first noted as far back as 2002 at CITES CoP12 when ETIS noted that “*the influence of the Chinese market as the single most important reason for upward trend [in ivory seized] from 1998 onwards.*”⁶

Under Annotation 6 to the listing of *Loxodonta Africana* in Appendix II, China and Japan were approved as ivory trading partners when the Secretariat and the Standing Committee concluded that both Parties “*have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP14) concerning domestic manufacturing and trade*”.

China and Japan are required to ensure compliance with Res. Conf. 10.10 (Rev. CoP 16) which requires both Parties to have “*comprehensive internal legislative, regulatory and enforcement measures*” to *inter alia*, monitor the flow of ivory within the State particularly by means of compulsory trade controls over raw ivory.

However, it is clear that China's domestic ivory trade control system is in non-compliance with the requirements of Res. Conf. 10.10 and has failed.⁷ Japan's domestic ivory trade control system is also non-compliant with Res. Conf. 10.10.

Evidence suggests that large quantities of ivory continue to be smuggled into Japan. In 2011, the former president and chairman of Takaichi Inc., was arrested for purchasing 50 illegal whole tusks. It is estimated that from 2005 to 2010, between 572 and 1,622 unregistered illegal ivory tusks were used to producing hankos (signature seals).⁸ In addition, there is no obligatory registration or licensing system for raw ivory in

Japan, merely a “notification system.”⁹ There are no penalties for non-compliance and no legal basis for the government to revoke registration or prohibit sales if the business violates the law.¹⁰ Thailand is also under scrutiny for its failure to address its increasing illegal domestic market.¹¹

EIA therefore recommends that the Standing Committee, in consultation with the Secretariat, adopt a decision requiring China and Japan to close down the legal ivory markets within their respective territories. The Standing Committee has the authority to adopt such measures since Annotation 6 to the CITES listing of *Loxodonta Africana* empowers the Standing Committee to “**decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations.**”

Regarding ivory stockpiles, at CoP16 Parties inserted new requirements in Res. Conf. 10.10 under the section “Regarding trade in elephant specimens”, paragraph (e) urging Parties to report to the Secretariat each year before 28 February the level of ivory stock maintained including the number of pieces and their weight per type of ivory (raw or worked), the source of the ivory, and the reasons for any significant changes in the stockpile compared to the preceding year.

EIA is concerned that only ten countries – four in Africa, three in Asia, two in Europe and one in North America – have submitted reports on this matter. Further, the Secretariat has not published the information submitted by these Parties for security reasons and has sought guidance from the Standing Committee on whether this can be made publicly available.

EIA urges the Standing Committee to ensure that the specific information concerning stockpiles identified in Res. Conf. 10.10 – concerning level of stock, source of the ivory and reasons for change in stock levels – be made publicly available and excluding sensitive information such as the location of the storage and warehouse facility.

There is sufficient precedent under CITES to publish ivory stockpile information: Parties regularly disclose the level of ivory stock maintained in their submissions requesting down-listing and ivory trade proposals.¹² UNODC has also identified official stockpiles of ivory (either confiscated or resulting from natural mortality or legal management programmes) as a potential source of illicit ivory¹³ and there are several reports of thefts from government-owned ivory stockpiles, from which ivory has likely entered illegal trade.¹⁴

EIA urges the Standing Committee to support the permanent disposal of all ivory stockpiles to ensure that such ivory does not enter trade.

EIA *recommends* that the Standing Committee:

- adopt a decision requiring China and Japan to shut down the legal ivory markets within their respective territories as per Annotation 6 to the CITES listing of *Loxodonta Africana* and Res. Conf. 10.10;
- adopt a decision requiring any other Parties that are not in compliance with Res. Conf. 10.10 to shut down their legal domestic ivory markets if any, and adopt urgent measures to demonstrate compliance with the Resolution;
- direct the Secretariat to publish non-sensitive information received under Res. Conf. 10.10 under section “Regarding trade in elephant specimens”, paragraph (e) as a matter of priority; and
- encourage Parties to destroy their ivory stockpiles following independent inventory and audit and DNA analysis for investigations.

SC65 Doc. 42.2, National ivory action plans

It is matter of serious concern that the National Ivory Action Plans (NIAPs), the feedback provided by the Secretariat on the content of these Plans, and the information shared by the primary concern countries on implementation of the Plans, have not been made publicly available by the CITES Secretariat. This reduces the opportunity for a wider and more rigorous evaluation of the reports submitted by the primary concern countries on the implementation of the Plans. EIA obtained the NIAPs through a request under the U.S. Freedom of Information Act and urges that the NIAPs are treated with greater transparency.

EIA is further concerned that the decision to initiate the process of obtaining NIAPs from countries of primary concern did not include any form of review by the Standing Committee of the content of the NIAPs against

specific, consistent and meaningful standards established by the Committee.¹⁵ Nor did the decision require these countries to amend their NIAPs based on feedback from the Standing Committee or the Secretariat. It appears that although the Secretariat did provide feedback to those countries on their NIAPs, only Malaysia revised its plan accordingly.¹⁶

The following comments are therefore based on the detail of the Action Plans submitted and the Secretariat's report in SC65 Doc.42.2.

Whilst some of the commitments made in the action plans are commendable (for example Uganda and Vietnam have made commitments to address corruption in ivory trade), by their very nature the plans submitted constitute self-imposed benchmarks and vary widely in terms of effective measures to tackle the illegal ivory trade. For example:

- **China:** China committed in its NIAP to prohibiting the sale of ivory without a certificate card even though this was a prerequisite for the decision to award them ivory trading partner status in 2008 and therefore is already part of existing domestic law in China. Further, China's NIAP focuses predominantly on regulating and "promoting" the ivory certification system, rather than on demand reduction even though China is the primary consumer country for ivory.

The Secretariat states as "unclear" implementation of China's commitment to analyse its own ivory trade database.

China has reported that four designated ivory processors and 27 designated ivory retailers have had their licenses revoked, however has not submitted any report to CITES regarding the trade undertaken by the enterprises which participated in the 2008 auction. Further, China has not detailed when and at what prices the ivory was sold by these enterprises, and no information is provided as to measures adopted to prevent abuse of the legal ivory trade system, which has been completely delegitimised.

- **Hong Kong:** Hong Kong's commitments in its NIAP are generally broad. There are no specific time-bound actions to elevate current activities which would be consistent with the crucial and continued role played by Hong Kong in international ivory trafficking.

Hong Kong makes broad enforcement commitments without identifying measurable indicators. Instead, activities appear to reflect existing standard enforcement activities. Although Hong Kong authorities seized almost 14 tonnes of ivory during the period 2011-2013, there were no related prosecutions for these cases to date.¹⁷ 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 however recent investigations have exposed the role of licensed ivory traders in the illegal ivory trade.¹⁸ The Secretariat has reported that no information has been submitted by Hong Kong on its control of legal domestic ivory trade.

- **Thailand:** Thailand's NIAP commits to amending its laws and regulations relating to trade in ivory – a commitment first made at CoP 13 (2005), yet the NIAP gives three years for implementation. Whilst amendments to legislation can be a lengthy process, Thailand has not yet delivered on repeated commitments to end domestic legal trade.

Thailand has not submitted any specific law enforcement actions, so no assessment can be made as to whether enhanced activities have taken place.

- **Tanzania:** The absence of relevant comparable baseline information makes it difficult to evaluate improvement and effectiveness of commitments. The Secretariat has reported that implementation of several commitments made by Tanzania for improving law enforcement remain unclear. Further, to the best of our knowledge at this time, Tanzania has not submitted DNA samples from its seized ivory stockpiles for analysis by appropriate forensic-analysis facilities. This is a matter of serious concern as Tanzania has been repeatedly identified as a key player in the illicit ivory trade¹⁹ and Tanzania's elephants are being decimated on a massive scale - from over hundreds of thousands in the 1970s to less than 70,000 elephants.²⁰

The Selous, the world's largest game reserve and once home to Africa's second largest elephant population where over 100,000 elephants roamed in the 1970s, is now home to only 13,000 elephants a loss of almost 70% in the last six years.²¹ The UNESCO World Heritage Site status of the Selous has now been listed as an endangered World Heritage Site because of widespread poaching.²²

Despite this serious decline, in the covering letter attached to the NIAP, Tanzania has articulated its intention to submit an elephant population down-listing proposal at CoP17. This is in direct contradiction to its commitment to the Elephant Protection Initiative which it endorsed at the recent Conference on Illegal Wildlife Trade hosted in London in February 2014.

- **Kenya:** Kenya submitted a fairly comprehensive and detailed action plan which has been commended by the Secretariat. Whilst a number of initiatives are already underway there are two significant issues that have not been addressed: meaningful prosecution of offenders across the entire trade chain and trafficking facilitated by corruption. A recent survey found that in Kenya only 4% of the 78% of offenders (mainly poachers) convicted of wildlife crimes received custodial sentences; the survey also found that despite reports of corruption facilitating wildlife crime, no prosecutions had been brought for charges of corruption and 70% of the case files related to wildlife crime were reported “missing” or “misplaced” in the courts.²³
- **Vietnam:** Vietnam has made a number of commitments in relation to the management and security of its ivory stockpiles and the Secretariat has reported that substantial progress has been made to establish a national, centralized, secure stockpile of seized ivory.

Since Vietnam’s ivory stockpile consists of confiscated ivory it is unclear why the government continues to stockpile such ivory instead of destroying it. Stockpiling not only incurs increased costs for maintenance and security but also poses a serious security risk of ivory thefts or leakage of ivory into the market.

Although the Secretariat has reported that Vietnam has substantially achieved its commitments related to legislation and regulation, and that new penalties have been established for wildlife crime, these laws must be implemented effectively.

A recent survey conducted by a Vietnam-based NGO found that out of 93 criminal cases related to serious wildlife crimes including illegal ivory trade, just under one third resulted in prison terms for one or more of the defendants and almost two thirds of the cases resulted in suspended sentences or probation; of six ivory cases prosecuted, only two cases resulted in prison terms for a total of three defendants.²⁴ It is hoped that implementation of the new legislation improves this situation.

EIA *recommends* that the Standing Committee:

- direct the Secretariat to publish the national ivory action plans, the feedback provided by the Secretariat on the content of the plans, and the information shared by the primary concern countries on implementation of the plans as a matter of priority excluding sensitive information if any; and
- establish a Working Group at this meeting to review the content of the national ivory action plans and develop a standardised framework for the structure of any further NIAPs to ensure consistency and provide a baseline for the development and implementation of the plans against which the NIAPs can be measured, to include:
 - (a) measures aimed at strengthening enforcement efforts along the entire trade chain;
 - (b) the provision of non-sensitive information on the outcomes of enforcement actions such as follow-up action related to ivory seizures (e.g. prosecutions and convictions);
 - (c) the adoption of a moratorium on domestic ivory trade where licensed trade in ivory has been alleged or proved to be used as a laundering mechanism for the trade in illegal ivory (such as in China including Hong Kong, Japan and Thailand); and
 - (d) the destruction of ivory stockpiles following independent inventory and audit and DNA analysis for investigations.

SC65 Doc. 42.3, Elephants: Decision-making mechanism for authorizing ivory trade

EIA strongly opposes any further discussion on the decision-making mechanism for authorizing ivory trade (DMM) and supports a complete ban on all international commercial trade in ivory. EIA is concerned that despite the ongoing elephant poaching crisis in Africa, the DMM continues to be discussed under CITES.

Decision 14.77 to develop the DMM was originally adopted in 2007, and renewed at CoP16 through Decision 16.55. Since this time, there has been an unprecedented escalation in the illegal ivory trade as evidenced by:

- a) CITES MIKE and ETIS Programmes have reported unprecedented levels of illegal killing of elephants and illegal trade in ivory even from incomplete data;
- b) the CITES 2008 “one-off” ivory sale to China and Japan has not reduced elephant poaching and illegal ivory trade and has instead facilitated the present elephant crisis by enabling the laundering of illegal ivory and fuelling demand for ivory among increasingly affluent Chinese citizens;
- c) new studies that have documented a 65% decline in forest elephants between 2002-2013;²⁵
- d) the growing opposition to trade in ivory at a national and international level including amongst governments,²⁶ the ivory retail industry,²⁷ business leaders²⁸ and civil society.²⁹

In light of this, and the fact that CITES has yet to fully examine the impacts of the previous ivory sales, there is no justification for the development of the DMM. EIA recommends that Parties support suspension of any future discussions on DMM at SC65 and that Decision 14.77 / 16.55 be allowed to expire at CoP17.

EIA further recommends that the Standing Committee determine that there is therefore no basis for UNEP to be involved in the discussion.

EIA believes that any further discussion of ‘legal’ trade in ivory or the DMM supports the perception that the international trade in ivory has legally resumed, and furthermore that this speculation stimulates the market and demand for ivory. Any legal market provides an opportunity to launder illegal ivory into the legal markets.³⁰

In addition, the availability of ivory from both legal and illegal sources further challenges law enforcement agencies in their efforts to effectively enforce and to tackle the criminal networks perpetuating the trade. EIA notes that SC65 Doc. 42.3 states that there is no clarity or consensus among the members of the DMM Working Group on the DMM and the best way forward.

In light of the international and national commitments made by several Parties to support prohibitions on ivory trade, including members of the DMM Working Group and EU Member States, EIA urges Parties to adopt a consistent position and ensure that further discussion related to legal ivory trade, including the DMM, are suspended within CITES at this time.

In addition, EIA urges the Parties to commission an independent review of domestic non-compliance with CITES requirements and identify criminal justice gaps and needs at all points in the trade chain from field to market place. Scope should include corruption and criminality factors, rates of identification and prosecution of criminals every level in the trade chain including crime “controllers”, and imposition of meaningful post-conviction penalties.

EIA *recommends* that the Standing Committee suspend any further discussion of Decision 16.55, including the work of the Working Group which was established to develop the DMM, and to recommend to the Conference of the Parties that it be allowed to expire at CoP17.

References:

¹ SC65 Doc. 42.1 (2014), Elephant Conservation, Illegal Killing And Ivory Trade at ¶50 and p.28

² SC65 Doc. 42.1 (2014), Elephant Conservation, Illegal Killing And Ivory Trade at ¶50

³ Center for Conservation Biology at the University of Washington, *Tracking Poached Ivory*, <http://conservationbiology.uw.edu/research-programs/tracking-poached-ivory/>

⁴ TRAFFIC (2013), *Court case verdict reveals true scale of 2011’s “Annus horribilis” for African Elephants*

<http://www.traffic.org/home/2013/5/24/court-case-verdict-reveals-true-scale-of-2011s-annus-horribi.html>;

Nanfang Daily (2013), *Gongbei Customs reveals details of the biggest ivory smuggling seizure in history*

http://gz.ifeng.com/fygy/detail_2013_11/05/1416530_0.shtml

⁵ SC65 Doc. 42.1 (2014), Elephant Conservation, Illegal Killing And Ivory Trade at pp. 30, 32.

⁶ CoP12 Doc. 34.1

⁷ See, e.g., CITES Secretariat (2013), *Report of the Secretariat: Monitoring of illegal trade in ivory and other elephant specimens*, CoP16 Doc. 53.2.1, ¶ 34; TRAFFIC (2014), *ETIS report of TRAFFIC*, CoP16 Doc. 53.2.2 at 14, 19; EIA (Aug. 2011), Briefing Document for the 61st Meeting of the CITES Standing Committee – *Elephants*; EIA (March 2012), *Blood Ivory: Exposing the Myth of a Regulated*

Market; Esmond Martin and Lucy Vigne (2011), *The Ivory Dynasty: A Report on the Soaring Demand for Elephant and Mammoth Ivory in Southern China*; IFAW (2012), *Making a Killing: A 2011 Survey of Ivory Markets in China*

⁸ Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.itef.jp/english/graph/2013WhatLiesBeneath.pdf>.

⁹ Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.itef.jp/english/graph/2013WhatLiesBeneath.pdf>.

¹⁰ Ibid.

¹¹ <http://www.traffic.org/home/2013/8/11/legal-reform-must-shut-down-thailands-ivory-trade.html>

¹² See, e.g., CoP16 Prop. 11, Proposal to transfer the population of the African elephant, *Loxodonta Africana* of the United Republic of Tanzania from Appendix I to Appendix II at pp.19-20

¹³ UNODC (Sept. 2013), *Report on Transnational Organized Crime in Eastern Africa: A Threat Assessment* at p.31,

http://www.unodc.org/documents/data-and-analysis/Studies/TOC_East_Africa_2013.pdf

¹⁴ See, e.g., Sunday Standard (2012), *Ivory stolen from government wildlife depot* (26 ivory tusks stolen from government stockpiles in Botswana), <http://www.sundaystandard.info/article.php?NewsID=13878&GroupID=1>; AllAfrica (2012), *Mozambique: Six Tonnes of Ivory Stolen* (6 tonnes of ivory stolen from government stockpiles in Mozambique), <http://allafrica.com/stories/201207091550.html>; News24 (2012), *Tons of Zambia ivory stolen* (3 tonnes of ivory stolen from government stockpiles in Zambia),

<http://www.news24.com/Africa/News/Tons-of-Zambia-ivory-stolen-20120620>

¹⁵ CITES Secretariat (March 2013), National Ivory Action Plans, SC64 Doc. 2; SC64 Summary Record (2013) at p. 2.

¹⁶ CITES Secretariat (2014), National Ivory Action Plans, SC65 Doc. 42.2 at p. 2

¹⁷ EIA, (2014), *In Cold Blood* citing total quantity from EIA-compiled records based on official Hong Kong Customs press releases; case updates provided by CITES MA Hong Kong (pers comms 2013)

¹⁸ See, e.g., South China Morning Post (12 February 2014), *Hong Kong craft shop staff secretly filmed advising customers how to smuggle ivory across border*

¹⁹ See, e.g., SC65 Doc. 42.1 Annex 1 at pp. 31-32 (2014); CoP16 Doc. 53.2.1 ¶ 32 (2013).

²⁰ REPORT BY TANZANIA ELEPHANT PROTECTION SOCIETY (TEPS) TASK FORCE TO THE PARLIAMENTARY COMMITTEE OF LAND, NATURAL RESOURCES AND ENVIRONMENT (April 2013)

²¹ TAWIRI (2013), *Aerial Census Of Large Animals In The Selous-Mikumi Ecosystem Dry Season, 2013*; Frankfurt Zoological Society Press Release (Jan. 2014), *Selous Elephants in Danger*; Tanzania Ministry Of Natural Resources And Tourism Press Release (2013), *Elephant Populations Status In Selous-Mikumi And Ruaha-Rungwa Ecosystems - Census Results Of 2013*

²² Agence France-Presse (06 June 2014), *UNESCO lists Selous among endangered heritage sites*,

<http://www.globalpost.com/dispatch/news/afp/140618/unesco-lists-tanzanian-reserve-among-endangered-heritage-sites>.

²³ Wildlife Direct (2014), *Scoping study on the prosecution of wildlife related crimes in Kenyan courts, January 2008 to June 2013*,

<http://baraza.wildlifedirect.org/files/2014/01/WILDLIFEDIRECT-court-study-26.1.14.pdf>.

²⁴ Education for Nature – Vietnam (ENV) (2014), *An evaluation of the outcomes of prosecutions for serious wildlife crimes in Vietnam*, http://www.envietnam.org/images/News_Resources/Publication/Review_of_the_outcomes_of_prosecutions_for_seriousP_wildlife_crime_s_in_Vietnam_2014.pdf

²⁵ WCS (12 February 2014), *New Data Shows Continued Decline of African Forest Elephants*, <http://www.wcs.org/press/press-releases/new-data-on-forest-elephants.aspx>

²⁶ See, e.g., Declaration: London Conference on the Illegal Wildlife Trade (Feb. 2014),

<https://www.gov.uk/government/publications/declaration-london-conference-on-the-illegal-wildlife-trade>; Elephant Protection Initiative

(Feb. 2014), <http://www.stopivory.org/wp-content/uploads/2014/02/Elephant-Protection-Initiative-210214.pdf>; European Parliament resolution of 15 January 2014 on wildlife crime (2013/2747(RSP)),

<http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P7-TA-2014-0031&language=EN&ring=B7-2014-0013>; The White

House (Feb. 2014), *National Strategy for Combating Wildlife Trafficking & Commercial Ban on Trade in Elephant Ivory*,

<http://www.whitehouse.gov/the-press-office/2014/02/11/fact-sheet-national-strategy-combating-wildlife-trafficking-commercial-b>; UK

Environmental Audit Committee (2012), *Wildlife Crime Report* at p.13,

<http://www.publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/140/140.pdf>;

²⁷ See, e.g., Wall Street Journal (May 2014), *Hong Kong Retailers Say They'll Stop Selling Ivory*,

<http://blogs.wsj.com/chinarealtime/2014/05/14/hong-kong-retailers-say-theyll-stop-selling-ivory/>.

²⁸ See, e.g., WildAid (Feb. 2014), *China's Top Business Leaders Say No to Ivory*, <http://www.wildaid.org/news/china%E2%80%99s-top-business-leaders-say-no-ivory>.

²⁹ See, e.g., iWorry Campaign, <http://iworry.org/campaign/>; <http://www.marchforelephants.org/#!worldwide-march-locations/cdr3>.

³⁰ See, e.g., UNODC (2010), *The Globalization of Crime: A Transnational Organized Crime Threat Assessment* at 278,

<http://www.unodc.org/unodc/en/data-and-analysis/tocta-2010.html>; Report of the Secretary General UN ECOSOC to the 12th Session of the U.N. Commission on Crime Prevention and Criminal Justice, *Illicit trafficking in protected species of wild flora and fauna and illicit access to genetic resources* ¶ 26 (2003), E/CN.15/2003/8,

<http://www.unodc.org/unodc/en/commissions/CCPCJ/session/12.html>.



Environmental Investigation Agency (UK)

62-63 Upper Street

London, N1 0NY

T: +44 (0) 207 3547960

E: ukinfo@eia-international.org

<http://www.eia-international.org/>

Environmental Investigation Agency (US)

PO Box 53343

Washington, DC 20009

T: +1 202 4836621

E: info@eia-global.org

<http://www.eia-global.org/>