

LETHAL EXPERIMENT



How the CITES-approved ivory sale led to
increased elephant poaching



Contents

Introduction

1



**Lifting the Ivory Ban:
Causes and Consequences**

2



Elephant Poaching Upsurge

10



Consumer Demand Rising

23



Conclusions & Recommendations

32



References

33



Acknowledgements

This report is dedicated to L.A. "Nick" Carter, who devoted his life to the conservation and protection of wildlife. Nick led efforts to promote the Lusaka Agreement on Co-operative Wildlife Enforcement, to assist African countries in their efforts to conserve their threatened wildlife heritage

Written by Allan Thornton, Clare Perry, Juliana Ruhfus, Martin Powell and Debbie Bell, Edited by Julian Newman.

Picture Research by Matthew Snead

Design by Presentation Design Ltd.

Many thanks to Brian Emmerson and all at Emmerson Press for the printing of this report (Emmerson Press tel: 01926 854400).

Printed on 100% recycled paper.

Cover photo shows Ivory from Namibia arriving in Japan. © Kyodo News.

Back cover photo shows poached elephants, Mozambique. © David Sheldrick Wildlife Trust.





Introduction

In 1997, Zimbabweans sang when the 10th CoP of CITES in Harare voted to downlist the elephant populations of Zimbabwe, Botswana and Namibia.

The songs have now faded as elephant poaching in Zimbabwe soars. An aerial census in 1999 estimated 1,378 elephant carcasses in Zimbabwe's Zambesi Valley, most between one and two years old. Within months of the CITES decision, the poachers were back at work in Zimbabwe. Numerous reports from international press and from sources in Zimbabwe with access to official elephant poaching figures confirm hundreds of elephant were also poached in 1999.

Reports of poaching cover-ups in Tanzania and Zambia have also been received where operators of hunting and tourist concessions seeing poached elephants fear official retaliation if they speak out. Even Traffic admits that elephant poaching has increased, while Kenya has documented increased elephant poaching and rising ivory prices.

Internationally, many of the largest ivory seizures in a decade have occurred around the world since the downlisting decision allowed Japan to import ivory.

The Parties at CoP 10 agreed to the southern African downlisting subject to stringent safeguards - including the setting up of an international monitoring system to detect any increase in illegal killing of elephants. The system was supposed to enable CITES to demonstrate causality - any link between southern Africa's sale of ivory to Japan and increased elephant poaching.

Although the monitoring system, known as MIKE, could not demonstrate causality and was not in place, the CITES Standing Committee allowed the sale of ivory to Japan to go-ahead, despite appeals from seven African range states to delay the sale until the system was in place, and similar cautions from the US.

Meanwhile, neither Zimbabwe, Botswana or Namibia have joined the Lusaka Agreement on Co-operative Wildlife Law Enforcement as required under Decision 10.1, nor have they produced any comparable enforcement agreement. Zimbabwe in its proposal to CITES CoP11 also fails to adequately explain the origin of 27 tonnes of ivory accumulated in less than two years.

Japan's ivory consumption is revealed to be several times the 10 tonne annual average claimed by the Japanese government. The seizure of illegal ivory bound for Japan at a Paris airport

in December 1999 contradicts claims by the CITES Deputy Secretary-General that Japan does not have a market for smuggled ivory.

EIA has also documented the emergence of China as major destination for illegal ivory and uncovered a recent ivory trading operation in China that distributes to China's Government Friendship Stores and many other elite stores in numerous cities.

Three major ivory seizures, in Paris, Nairobi and Moscow, from North Korean embassy staff en route to China, also point to the renewed emergence of China as an ivory trading centre.

Kenya and India propose to restore the elephant populations of Zimbabwe, Botswana and Namibia to Appendix 1. The proposal deserves strong support, given increased poaching, increased ivory seizures, the failure of CITES to implement a monitoring system and the failure of Zimbabwe, Namibia and Botswana to join the Lusaka Agreement. The ivory trade experiment has failed.

The European Union abstention on the vote in Harare in 1997 allowed the ivory trade proposals to pass. The European Union has often rightfully prided itself on adopting the precautionary approach to environmental issues. The Kenya and India proposal is the only precautionary elephant proposal on the table.

Unless the southern elephant populations are put back on Appendix 1, CITES risks repeating the mistakes made in the 1980's when elephant poaching and ivory smuggling thrived and elephants declined across much of their range while "experts" argued that international ivory trade could be controlled.

Allan Thornton

Environmental Investigation Agency, Chairman
April 2000



© David Sheffer/EIA



By abstaining, the European Union nations swung the vote in favour of the downlistings.

Lifting the Ivory ban: Causes and Consequences

In June 1997, at the 10th Conference of the Parties (CoP) to CITES in Harare, Zimbabwe, Botswana and Namibia put forward proposals to transfer their elephant populations from Appendix I to Appendix II, in order to trade internationally in ivory, other elephant parts and live specimens. Many West, Central and East African countries expressed strong concerns that resumed international ivory trade might have a damaging impact on their own, often smaller and more vulnerable elephant populations.

After several days of intense pressure from the highest levels of the Southern African governments, non-stop negotiations, acrimonious debate and a series of secret ballots, a single amended proposal passed by secret ballot. By abstaining, the European Union nations swung the vote in favour of the downlistings.

Many African elephant range States were opposed, including Ghana, Kenya, Liberia, Equatorial Guinea, Niger, Cameroon, Chad, Gabon and Ivory Coast. Other opponents included India, Nepal and Vietnam, Israel, Australia and the US. After the final secret ballot, the US publicly announced that it had voted against the amended proposal because of concerns that renewed trade could trigger a general upsurge in poaching.⁽¹⁾

The elephant populations of Zimbabwe, Botswana and Namibia were thus transferred to Appendix II with an annotation to allow a single "experimental" export of raw ivory from declared stocks, excluding poached and confiscated ivory, from these countries to Japan.

Below:
Zimbabwe's Minister of Environment and Tourism Chen Chimutengwende (right) celebrating the downlisting decision in Harare 1997



© Sarah Jane Powell/Associated Press

CITES Parties Attach Tough Conditions to Ivory Sales

Together with the downlistings, the Parties to CITES adopted Resolution Conf.10.10 on trade in elephant specimens. This included requirements on marking ivory, controlling internal ivory trade, and monitoring illegal hunting of, and trade in, elephant specimens. It effectively imposed a number of safeguards which had to met before the ivory sale could take place.

It stated that "a comprehensive, international monitoring system shall be established under the supervision and direction of the Standing Committee with the objectives of:

i) measuring and recording current levels and trends of illegal hunting and trade in ivory in African and Asian range States, and in trade entrepots;

ii) assessing whether and to what extent observed trends are a result of changes in the listing of elephant populations in CITES appendices and/or the resumption of legal international trade in ivory; and

iii) establishing an information base to support the making of decisions on appropriate remedial action in the event of any problems with compliance or potential detriment to the species;"

The Parties also agreed a number of strict conditions to be met by the southern African nations before the experimental ivory trade could take place. These were set out in Decision 10.1 "Conditions for the resumption of trade in African elephant ivory from populations transferred to Appendix II at the 10th meeting of the Conference of the Parties." This Decision obliged Zimbabwe, Botswana and Namibia to:

- correct deficiencies in enforcement and control measures identified by the CITES Panel of Experts (this also applied to Japan);
- withdraw their reservations to the Appendix I listing of the African elephant prior to the entry into force of the transfer to Appendix II;
- commit to international law enforcement through appropriate mechanisms such as the Lusaka Agreement;
- establish or strengthen mechanisms to reinvest trade revenues into elephant conservation; and
- comply with precautionary undertakings detailed in their supporting statements to the downlisting proposals.⁽²⁾

To date, neither Zimbabwe, Botswana or Namibia have joined the Lusaka agreement or developed any similar international wildlife



enforcement agreement. Failure to enact this important pre-condition violates the terms attached to the resumption of ivory trade to Japan.

Comprehensive international systems to monitor and report legal and illegal ivory trade and illegal hunting of elephants were also made a condition of international ivory trade in Decision 10.1 Part A (i), which stated that trade in ivory could not resume unless:

"The relevant range States, the CITES Secretariat, TRAFFIC International and any other approved party agree to:

- i) an international system for reporting and monitoring legal and illegal international trade, through an international database in the CITES Secretariat and TRAFFIC International; and
- ii) an international system for reporting and monitoring illegal trade and illegal hunting within or between elephant range States, through an international database in the CITES Secretariat, with support from TRAFFIC International and institutions such as the IUCN/SSC African Elephant Specialist Group and the Lusaka Agreement.²⁹⁽¹⁾

To address the concerns of elephant range States that feared an upsurge of elephant poaching, Decision 10.1 Part A (g) charged the Standing Committee with agreeing a mechanism for halting trade and retransferring one or more of the elephant populations to Appendix I if the

conditions were not met or if there was an escalation of illegal hunting or of illegal trade owing to the resumption of legal trade.³⁰ It was widely assumed that the monitoring systems called for in Decision 10.1 and Res. Conf. 10.10 would play a key part in that mechanism.

The CITES Secretariat was charged with verifying the fulfilment of these conditions and the Standing Committee with agreeing that all the conditions had been met before trade in raw ivory could resume.³¹ The Standing Committee were further charged with evaluating any negative impacts of the experimental trade.³²

The Development of Elephant and Ivory Monitoring Systems: An Exercise in Failure?

In December 1997, TRAFFIC, the World Conservation Union and the Species Survival Commission (IUCN/SSC) held a workshop in Nairobi to develop a framework for the CITES-administered systems which would monitor the impact of renewed international ivory trade.

A critically important aspect of any such system would be its clear ability to demonstrate "causality", determining whether any increase in elephant poaching is linked to the resumption of international ivory trade.

The participants recommended two new sys-

Systems to monitor and report legal and illegal ivory trade and illegal hunting of elephants were also made a condition of international ivory trade



Left:
Japanese buyers in
Zimbabwe's ivory room



The comprehensive international monitoring system... was already significantly diluted at a preliminary stage

*Below:
Poached elephant,
Kenya. The ivory sale
went ahead before agreed
safeguards were in place*

tems: an integrated Elephant Trade Information System (ETIS) based on an expansion of TRAFFIC's existing Bad Ivory Database System (BIDS), collecting data on trade in all elephant products, including ivory; and a system for "Monitoring the Illegal Killing of Elephants", since known as MIKE, for which there was no existing operational structure. The workshop concluded "such a system would not be in place in time, or able to collect sufficient data, to provide any analysis for the Standing Committee meeting in 1999."

It therefore proposed an "Interim System for 1999" to supply data for the 1999 meeting at which the Standing Committee would determine whether limited commercial trade in ivory and other elephant products could commence. The Interim System would be based on a request from the CITES Secretariat to range States to supply data on elephant poaching and enforcement since 1990.¹⁷

Clearly such a system does not constitute an "international monitoring system". It is merely a

voluntary national system with no possibility of an independent international assessment of poaching levels. Moreover the Interim System relies on the resources, priorities, goodwill and integrity of range States to fully and accurately report incidents of poaching. Elephant poaching in Zimbabwe has increased dramatically in the Zambezi Valley according to a recent WWF-SARPO aerial census which estimated 1,378 elephant carcasses.¹⁸ Allegations that the Zimbabwean authorities have purposefully failed to submit full details of the extent of poaching suggest that this alarming increase in poaching since the downlisting will not be detected by the Interim Reporting System.¹⁹

Thus the comprehensive international monitoring system which member nations had required as a condition of renewed ivory trade was already significantly diluted at a preliminary stage – without any formal discussion by the Parties to CITES. The burden of proof had been effectively shifted to range States, contradicting the intent of Decision 10.1.





CITES Secretariat Acknowledges Monitoring Systems' Flaws

In March 1998, at the 40th meeting of the CITES Standing Committee, the Secretariat's Elephant Co-ordinator acknowledged that even the stop-gap Interim System proposed for 1999 was unlikely to prove viable. He pointed out that expecting African range States to assemble national illegal off-take figures on an annual basis was unrealistic as "...for most range States there are no existing national poaching statistics".⁽¹⁰⁾

Despite this warning from its own Elephant Co-ordinator, the Standing Committee agreed that the Secretariat should develop a National Reporting Form for the Interim System and should also distribute an Incident Reporting Form to initiate collection of data that might provide an early warning of poaching problems. IUCN/SSC were also requested to continue developing MIKE as a long-term site based system to monitor illegal killings.⁽¹¹⁾

The Secretariat distributed its "Incident Report Form on Illegal Hunting of Elephants" in March 1998.⁽¹²⁾ The "National Reporting Form on Illegal Killing of Elephants" was distributed three months later. The Secretariat noted that the returns would be "used to conduct an analysis of the possible effects of the amendments to the CITES appendices on the killing of elephants" and that the results would be presented to the Standing Committee.⁽¹³⁾ The forms were drawn up without meaningful consultation with elephant range States and were considered to be overly complicated, cumbersome and very time consuming to fill out for under resourced wildlife departments in Africa and Asia.⁽¹⁴⁾

By 31 December 1998, one month before the Standing Committee were due to take the decision whether or not to allow the experimental ivory trade, only three countries had returned the National Reporting Form.⁽¹⁵⁾ The system for monitoring the effects of the renewed international ivory trade existed only in theory.

A separate report presented to the 40th CITES Standing Committee meeting discussed potential mechanisms for halting trade and returning populations to Appendix I as required by Decision 10.1 Part A (g). This noted that "there is no way in which elephant populations can be 'immediately' transferred to Appendix I by the Conference of the Parties", since changes to Appendices required a proposal by a Party as specified in Article XV of the Convention.⁽¹⁶⁾

The Standing Committee therefore agreed that the mechanism employed would be a Standing Committee request to the Depository

Government, Switzerland, to make a proposal to return one or more elephant populations to Appendix I, if necessary by postal procedures. The Committee would also request the relevant countries to immediately cease commercial trade in raw ivory.⁽¹⁷⁾

It was agreed that two sets of circumstances should trigger such action. Firstly if there was a failure to comply with the conditions attached to trade outlined in the previous section. Secondly if there was an escalation in illegal hunting of elephants and/or trade in elephant specimens as a result of renewed legal international trade. However, the report to the Standing Committee had noted that only the operation of the international monitoring system required by Parties in Decision 10.1 would provide the necessary information to make such a judgement about elephant poaching and illegal ivory trade.⁽¹⁸⁾

This was a clear admission that if ivory auctions were approved without a comprehensive monitoring system first in place, it would be very difficult to prove that any surge in poaching could be definitively linked to the renewed trade. Without such proof it would be very difficult, in turn, to trigger a return of southern African elephant populations to Appendix I. Yet ten months later the CITES Standing Committee approved ivory auctions in three countries with only an incomplete and inadequate interim monitoring system in place. As a result the 1999 international ivory sales were effectively an experiment without a control.

Sale of Southern African Ivory to Japan Approved

In February 1999, at the 41st Standing Committee meeting, the proposal for a long-term site-based system for monitoring the illegal killing of elephants (MIKE) was presented to the Standing Committee in Geneva by the CITES Secretariat. The report was launched in the name of the IUCN/SSC African and Asian Elephant Specialist Groups, however the proposal was not produced or peer reviewed by either group, despite repeated appeals by some of their members to be allowed to participate.⁽¹⁹⁾ IUCN subsequently withdrew the name of the Elephant Specialist Groups from the document,⁽²⁰⁾ as the Elephant Specialist Group members were never invited to peer review or endorse the system. The involvement of the African Elephant Specialist Group, required under Decision 10.1, did not occur.

Nevertheless the Secretariat stated its belief

The 1999 international ivory sales were effectively an experiment without a control.



**By late
November 1999
just four
countries had
submitted the
National
Reporting Form
on Illegal Killing
of Elephants.**

that the proposed system met all the requirements laid out by CITES Parties at Harare in June 1997.⁽¹⁰⁾ This belief was not shared by seven African nations who rejected the proposed monitoring system outright. Kenya, Liberia, Ghana, Congo, Chad, Zambia and Mali argued that MIKE would neither provide elephant poaching data quickly enough to protect populations, nor prove a direct causal link between the CITES trade decision and the illegal killing of elephants in either Africa or Asia. They also condemned the lack of adequate consultation with range States and requested that the Standing Committee institute a peer review of MIKE and ETIS that would involve all African and Asian range States.⁽²²⁾

The US Government echoed these concerns in a highly critical statement to the Standing Committee meeting: "Based on our evaluation, the monitoring system cannot in the short term provide information to demonstrate that a certain level of poaching was or was not caused by the re-opening of ivory trade. Over the long-term (it) should provide useful information on trends in elephant populations and poaching of elephants, but cannot be expected to provide statistically significant conclusions as to causality, within the time frames envisioned by Decision 10.1."⁽²³⁾

A legal briefing presented by WWF International warned the Standing Committee not to certify that the monitoring conditions were in place to approve the ivory sales until all these concerns had been addressed. "As a legal matter, the Standing Committee may not report that the conditions in Decision 10.1 A have been met until it finds there has been genuine agreement on a workable causality mechanism. Decision 10.1 explicitly binds the Standing Committee to determining that all of the conditions listed in 10.1 have been met before compliance can be agreed."⁽²⁴⁾

Despite these wide-ranging criticisms and concerns, the Standing Committee took the momentous step in Geneva of authorising the international commercial sale of ivory stockpiles in Namibia and Zimbabwe to Japan. The anxieties expressed by many other elephant range States were effectively ignored. The Standing Committee agreed to set up a sub-group to further develop MIKE and Botswana's request to sell ivory was approved after the Secretariat verified that outstanding deficiencies in its ivory recording system had been corrected.

The Standing Committee also agreed an operational procedure, presented by the Secretariat, whereby the Secretariat would

recommend to the Committee that international trade be halted, should the Secretariat conclude that there had been an "important increase" in illegal hunting of elephants or illegal trade in elephant specimens, or non-compliance with Decision 10.1 A.⁽²⁵⁾

This procedure was agreed by the Standing Committee as the basis for implementation of paragraph (g) of Decision 10.1 A. (26) At no point in the operational procedure is the transfer of elephant populations to Appendix I mentioned, nor is there any explanation as to what specific criteria the Secretariat would use to determine an "important increase" in poaching or illegal trade. The Secretariat noted that "Information on escalation of illegal hunting of elephants will become more precise once MIKE begins to provide better information on 'background rates' of poaching" However this was meaningless since it had already been decided that the experimental ivory sale, and the Secretariat's assessment of the sale, would take place long before MIKE was implemented.

Burden of Proof is Shifted to Elephant Range States

The international monitoring safeguards that had played a crucial part in persuading many governments to allow the elephant downlistings in 1997 did not exist when the international ivory sales to Japan went ahead. Yet the CITES Standing Committee did not even vote on whether auctions should proceed in Zimbabwe, Namibia and Botswana.

The burden of proof was effectively shifted by the Standing Committee onto elephant range States, requiring them to produce data on elephant poaching for use in the Interim System.

It instructed the Secretariat to use the fledgling system to decide whether the experimental commercial trade triggered an 'important increase' in either illegal hunting of elephants or illegal trade in elephant specimens.⁽²⁷⁾

In practice, a severe lack of data has made it almost impossible for such a judgement to be made, despite a proliferation of reports of increased poaching in the past 16 months. By late November 1999 just four countries had submitted the National Reporting Form on Illegal Killing of Elephants. The Secretariat has also expressed disappointment at the "low number of responses" to its Incident Report Form "especially since media reports indicate incidents of poaching in a number of elephant range States. Full participation in the monitor-



ing and reporting systems is essential if an accurate overview of poaching is to be obtained."¹²⁸

In addition, the Ivory and Elephant Product Seizure Form, designed to feed into ETIS, has only found a "limited use" among range States, prompting the Secretariat to complain that "such a poor response from Parties precludes the Secretariat from fully carrying out its responsibilities under decisions adopted at the 10th CoP."¹²⁹

Such comments appear designed to shift the blame for the monitoring systems' failure to gather adequate data from the Secretariat to the range States, many of which have extremely limited funds for wildlife conservation.

In February 2000, Traffic admitted that only the seizures database of ETIS was up and running with subsidiary databases on law enforcement effort still under development. A full analytical report is not expected until CoPXII in 2002 – a full three years after international ivory trading was allowed to resume.¹³⁰

The ivory auctions, attended by Japanese buyers and CITES Secretariat observers took place under armed guard in Zimbabwe, Botswana and Namibia in April 1999. A total of 49,574kg of ivory, representing 5,446 tusks was purchased.¹³¹ On 17 July 1999 all the ivory from

the sales was imported into Japan. In total, according to the CITES Secretariat, the auctions raised approximately US\$ 5 million for the southern African governments.¹³² The national breakdown and utilisation of these funds has not to date been released to the public.

The Secretariat later voiced anxiety at the cost of verifying compliance with the precautionary undertakings for the sale and shipment of the raw ivory. "The Secretariat would like to raise the concern that all these activities, although they have been successfully completed, required a significant amount of human and financial resources from the Secretariat."¹³³

*Below:
Poached elephant,
Mozambique. By
November 1999 only
four countries had
submitted poaching forms*





MIKE System Deeply Flawed

As Parties to CITES gather for the 11th CoP in Nairobi, more than 13 months have passed since the Standing Committee rejected appeals by African elephant range States not to authorise international ivory sales until international monitoring safeguards were in place. The monitoring system is not likely to be up and running for many years and it will never be able to demonstrate causality between the resumed ivory trade and increased elephant poaching.

To date, only one regional MIKE pilot phase has been established, in Central Africa. The project will not be completed until November 2000, so Parties to CITES will be unable to review its effectiveness until the 12th CoP in 2002 or 2003. Pilot projects in South East Asia, Southern Africa and West Africa are still at various preliminary stages of implementation.⁽³⁴⁾

The aims of the MIKE monitoring system, as presented to the 41st Standing Committee meeting, are to:

- determine real trends in illegal killing of elephants
- determine changes in these trends over time
- determine the causes of these changes over time, and
- integrate appropriate analyses of such information with that of ETIS to assist decision-making by Range States and other Parties to CITES⁽³⁵⁾

Monitoring will be focussed on individual sites supposedly selected to form an unbiased and representative sample across African and Asian elephant range states. The data collected will cover elephant population numbers and trends, mortality rates, law enforcement effort, external factors (such as levels of human activity and presence of civil strife) and other qualitative or proxy data, such as intelligence reports and changes in elephant behaviour. Live elephant and carcass surveys, which the success of the system depends upon, are planned for every two years, with the additional data collected more regularly.

If MIKE sampled 45 sites across the African region and 15 sites across Asia, the system would have approximately 90% chance of detecting a 33% change in levels of illegal killing. The estimated annual cost for MIKE over 6 years is US\$13.8 million. To date, only a small fraction of these funds have been provided or pledged by donors. At their own admission the Secretariat has stated "the level of Secretariat involvement in MIKE cannot be sustained unless major new resources become available."⁽³⁶⁾

As it stands, MIKE is clearly unable to satisfy the requirements for comprehensive monitoring of the impact of ivory trade, which was explicitly required by the Parties to CITES at CoP 10 in June 1997. Many of the damning criticisms that follow have been raised at Standing Committee by elephant range States and other acknowledged experts.

MIKE is Not Precautionary

By the time MIKE is able to even confirm increased poaching levels, poaching will have already entrenched itself in afflicted elephant range States. Poaching networks will have revived, ivory prices are likely to have increased, trade networks will have re-emerged, illicit ivory dealers will have re-established themselves. The system does not provide significant data until it has operated for 6 years.

MIKE Cannot Show Causality

The ability to prove causality was a key requirement of Decision 10.1 and Resolution Conf. 10.10. Yet at no point does the MIKE proposal state how a link between resumed international ivory trade and increased poaching will be proven or disproved - a failing which

seriously undermines the whole purpose of its existence.

As the World Wildlife Fund (WWF) warned at the 41st Standing Committee in meeting in February 1999: [MIKE and ETIS] "do not...allow us to predict the location and intensity of poaching pressures in the absence of legal ivory trade with sufficient certainty such that, if observed levels exceed predictions, they can be attributed to resumption of legal ivory trade. It may be nearly impossible to statistically establish trade-related causality in such a complex system..."⁽³⁷⁾

MIKE Requires a Vast Range and Volume of Information to be Collected

Compliance with MIKE requires information on a wide variety of external circumstances including civil strife, other illegal activities and



levels of human activity as well as basic data on elephant numbers and mortality rates. The large number of parameters both increases costs and clouds the central issue. As a result it will be virtually impossible to elucidate the effect of the legal trade parameter alone. There is however one notable data omission, namely the significant role played by ivory prices in escalating poaching.

MIKE Requires all Range States to Submit Comparable Data on the Chosen Sites

Some range States are in a much better position to submit the required data than others. Without comparable data the system will not work.

There is Insufficient Baseline Data

Since the MIKE system was not implemented at the time of the international ivory sale authorised by the Standing Committee, the sale can be likened to an uncontrolled experiment on elephants.

The Method of Site Selection is Unrealistic

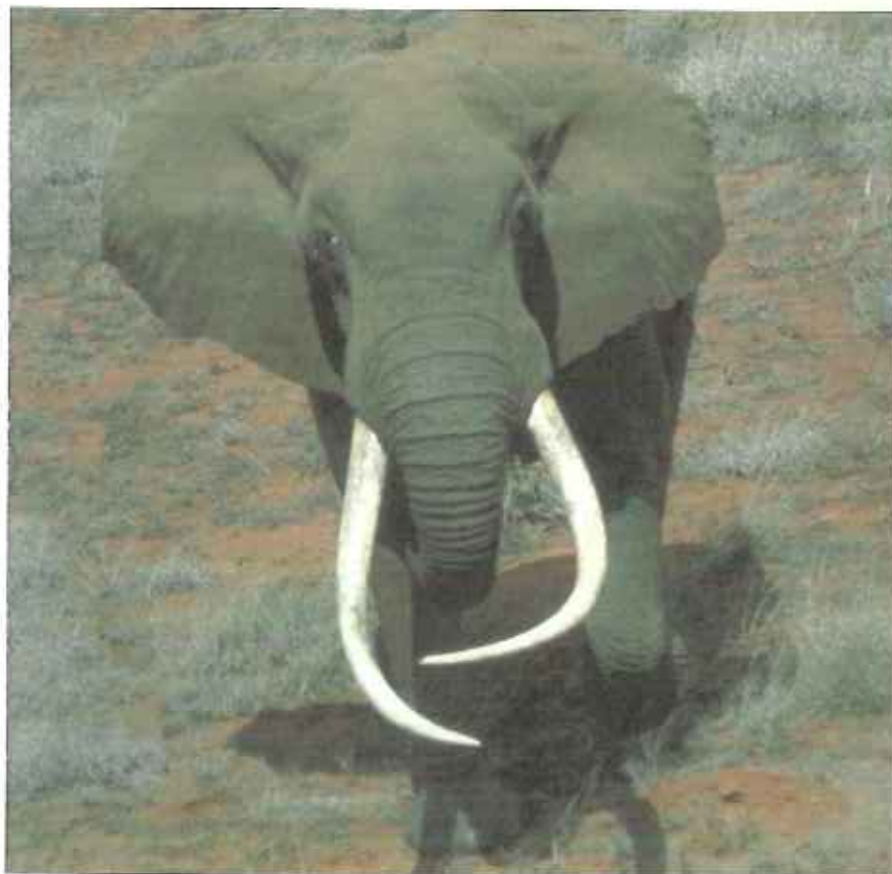
The MIKE sites were chosen to provide a representative sample of elephant habitat across Africa and Asia. This is likely to give an unreliable picture of any surge in poaching. A more realistic approach would involve monitoring "hotspot" sites, such as those where widespread illegal killing had occurred in the past, or where anti-poaching effort was limited.

No Trigger Level of Poaching Escalation to Allow Appendix I Listing of the Unprotected Elephant Populations

The proposal states that MIKE would detect a 33% increase in poaching with a 90% probability. Allowing such a large increase in poaching before acting to halt ivory trade could spell disaster for some elephant populations, particularly in West Africa and Asia.

MIKE is Insensitive to Minor or Localised Changes in Elephant Populations

It is not clear from the MIKE proposal whether confidence limits apply to each individual site, to all the sites, or to a sub-set of sites. Experience shows that escalations in poaching do not occur



© David Sturnik/ISA

across the board. If poaching increased by 33% in just one or several sites while other regions remained stable, would MIKE detect it with 90% probability, or would it require a 33% increase overall in all monitored sites?

Above: MIKE sites are based on elephant habitat samples rather than areas vulnerable to poaching

MIKE is Not Suitable for Asian Elephants

Asian elephant experts have expressed concern that the sampling methodology is not suited to Asia, because elephant populations in Asia are smaller in size and carcasses are more difficult to discover. In addition, too few sites in Asia are proposed and they are not representative.⁽³⁸⁾

Inadequate Consultation to Develop MIKE

The CITES Standing Committee ignored appeals by elephant range States, international organisations and other Parties to CITES to institute a full peer review of MIKE before the experimental trade of ivory was allowed.

MIKE is Expensive and Impractical

Over six years, MIKE will cost more than US \$13 million to operate. Range States argue that money would be more effectively and wisely spent to protect elephants before poaching escalates rather than on monitoring the number of elephants illegally killed.



*Right:
Japanese ivory buyer
inspecting Zimbabwe's
stockpile*



© Howard Bachelder/Reuters

Elephant Poaching Upsurge

While the southern African countries were still celebrating their downlisting victory, reports were already emerging of increased elephant poaching activity. While many of the initial reports were difficult to verify, by late 1997 buried ivory caches in East Africa were on the move again.⁽¹⁾ Despite the intricacies of the CITES decision the message percolating down to the field was of a resumed ivory trade.

A number of range States across Africa and Asia are now reporting higher levels of elephant poaching compared with the pre-downlisting

period. Zimbabwe, which is proposing further ivory sales, is experiencing intense poaching activity along the Zambezi Valley. Kenya, the leading proponent of restoring all elephant populations to Appendix 1, has seen both the level of poaching and ivory seizures rise dramatically over the last two years.

Zimbabwe

While the Government of Zimbabwe presses CITES with plans to sell ivory annually, dramatic evidence is emerging of increased elephant poaching in the country, and a concerted effort by the authorities to cover-up the true scale of the problem.

The results of an aerial census of elephants in the Zambezi Valley carried out in October and November 1999 revealed "one of the most serious poaching incidents in Zimbabwe the past 20 years" according to a senior wildlife conservationist.⁽²⁾ An estimated 1,378 elephant carcasses were recorded in the Zambezi region – a carcass ratio of over 11%, indicating a declining population.⁽³⁾

Faced with evidence that could undermine Zimbabwe's plans for future ivory sales, the authorities have engaged in a campaign of information suppression and ludicrous claims concerning the cause of the poaching. An informed source close to the Zimbabwe

*Below:
Zimbabwe's ivory room -
the authorities collected
27 tonnes of ivory in less
than two years*



© Sarah Love/Paneth/Associated Press



© Craig Gibson/EPA

The aerial census... "clearly symbolizes one of the most serious poaching incidents in Zimbabwe in the past 20 years."

Left: A reminder of poaching in the 1980s, Matsudona NP, Zimbabwe

Department of National Parks and Wildlife Management (DNPWLM) has alleged that the Director of the DNPWLM failed to submit all of the available elephant poaching incident forms to the CITES Secretariat.¹⁴¹

According to press reports there has been a concerted effort to mask the true extent of poaching. One senior park's official is quoted as saying: "The department is underreporting case numbers because they fear the publicity will affect ivory trade."¹⁴²

Suppression of the evidence of elephant poaching qualifies as an abuse of the downlisting process, which under the strictures agreed in Harare in 1997 should ensure an automatic proposal to re-transfer Zimbabwe's elephant population to Appendix 1.

In addition, close analysis of the 27 tonnes of new ivory stockpiles that the Zimbabwe Government claims to have collected in less than two years raises many unanswered and disturbing questions. There is no mention of 12 metric tonnes of ivory sold to domestic buyers in the last 22 months, nor is there any explanation for over two tonnes of ivory of "unknown" origin or nearly four tonnes of ivory from "PO" (presumably poached) which is not a CITES category. In all, this totals about 18 tonnes of ivory of unknown origin.¹⁴³

Additionally, the quantities of ivory the government holds for CAMPFIRE are claimed to amount to 8,921.86 kg but simple addition of

the figures supplied shows that they in fact add up to only 4,704.73 kg.

Elephant Poaching in Zimbabwe

Elephant poaching in the Zambezi Valley of Zimbabwe was intense and well established by 1998 and continued into 1999. The Zimbabwean government's proposal to CITES CoP 11 merely notes "some increase" but does not provide all the detailed poaching data available. In reality elephant poaching more than doubled in the area during that period according to elephant carcass counts.

The aerial census conducted in late 1999 shows a dramatic escalation in poaching. Along the Zambezi Valley hundreds of carcasses were seen scattered near the Zambian border. Some 1,378 carcasses were estimated, prompting David Cumming, director of WWF's Southern Africa Regional Office and former director of Zimbabwe's National Parks, to comment: "The percentage of carcasses to live elephants on the Zambezi floor was five per cent last year, but 10 per cent this year. It clearly symbolizes one of the most serious poaching incidents in Zimbabwe in the past 20 years."¹⁴⁴

The survey covered elephant populations along the Zambezi Valley floor, the Dande Safari area and the Gurube communal lands. The number of elephant carcasses estimated for the Zambezi Valley region was 1,378+/- 14.8%, rep-



representing a carcass ratio of around 11.25%. Of these 1,198 +/- 14.1% were estimated for the Zambezi Valley floor area and 180 +/- 60.6% elephant carcasses estimated for the Dande Safari Area/Guruve Communal Lands area, representing carcass ratios of 12.65% and 6.5% respectively.⁽⁶⁾

Carcass ratios of 2-8% indicate a stable or increasing population while ratios greater than

9% indicate a declining population.⁽⁶⁾ Six of the 13 sub-areas surveyed had carcass ratios higher than nine per cent, proof of a declining elephant population in the region. Nearly all of the carcasses recorded were over one year old, characterised by scattered and bleached bones, indicating an escalation in poaching soon after the downlisting decision.

Table 3. Elephant carcass ratios in the Zambezi Valley Region, 1999

(source:WWF-SARPO, 1999)

Stratum	Estimate of Carcasses	Estimate of Elephant	Carcass Ratio
Zambezi Valley Floor			
Rifa	277	630	30.54
Hurungwe	365	1571	18.85
MP flood Plain	80	986	7.50
MP Main	251	1,241	16.82
Sapi North	16	510	3.04
Sapi South	43	768	5.30
Chewore North	96	888	9.76
Chewore South	71	1,681	4.05
TOTAL	1,198	8,276	12.60
Dande Safari Area/Guruve Communal Lands			
Chapoto	17	406	4.02
Dande SA	68	909	6.96
Chisunga	45	124	26.63
Kanyurira Valley	27	0	100.00
Kadze	23	1,151	1.96
TOTAL	180	2,590	6.50
GRAND TOTAL	1,378	10,866	11.25

*Below:
Mana Pools NP,
Zimbabwe. Poaching in
the surrounding
Zambezi Valley has
doubled in a year*





Cover Up of Elephant Poaching

By August 1999 between 300 and 400 elephants had been poached in Zimbabwe during that year alone, according to sources that had access to poaching data produced for the DNPWLM.⁽¹⁰⁾ These poaching figures are not included in Zimbabwe's proposal for annual ivory quotas submitted to CoP 11.

The source alleged that poaching data was actively suppressed by the then Director of DNPWLM, Willas Makombe, who insisted that all poaching incident forms intended for CITES be submitted directly to him.

The source claims that dozens of elephant poaching forms were provided to the Director for the first half of 1999, but only a fraction were said to have been subsequently submitted to the CITES Secretariat, as required under the CITES Secretariat Interim System for monitoring illegal killing of elephants.

With official figures proving unreliable, it has been left to press reports to provide an insight into current poaching levels in Zimbabwe. One report quoted a figure of at least 350 poached elephants for 1999, stating that the Zambezi Valley region was hardest hit.⁽¹¹⁾ Another report, by Newsweek International, also quoted a figure of 350 poached elephants, adding that it represented a twofold increase compared with the previous year. It also said the Zimbabwe authorities were claiming just 81 elephants poached.⁽¹²⁾

Yet in November 1999 a Zimbabwe government-owned newspaper was reporting a dramatic upsurge in poaching, adding that 84 elephants had been poached so far that year in a single National Park – Chewore, near the border with Zambia and Mozambique. The newspaper claimed 31 elephants had been killed in two weeks inside the park.⁽¹³⁾

In some instances the authorities have been implicated in the poaching spree. The Daily Telegraph of London wrote: "Suspicions are growing that senior officials in the Zimbabwean government are involved in the recent upsurge of poaching and are deliberately undermining the efforts of game scouts struggling to stem the tide."

The report said poachers had been observed using radios identical to those used by the scouts. A member of an anti-poaching patrol was quoted as saying: "That radio could only have been obtained from someone in the National Parks Department. They must be getting help from someone corrupt high up". When a poacher was captured after being wounded in a gunfight, the anti poaching officer said: "When we

interrogated him, he said that he knew his bosses were being helped by senior figures in Harare."⁽¹⁴⁾

Evidence is also emerging that the poaching gangs are well-organised and well-equipped with automatic weapons. In one instance ten elephant carcasses were discovered in the Chewore area all killed with a single shot to the brain, indicating the work of highly skilled professional poachers. A journalist in the area quoted a safari operator as saying: "The poachers are hitting elephant right along the Zambezi Valley, there has been a marked increase this year." A professional hunter added: "There has been a dramatic increase in poaching in the last year it is almost like an armed insurrection. We've not seen anything like this in our area before."⁽¹⁵⁾

Many tour operators and hunters witnessing the escalation in poaching first hand have been reluctant to speak out for fear of upsetting the authorities and losing their operating licences. One hunter said there had been a definite rise in poaching, and spoke of 24 elephant carcasses being found in the Matetsi area.⁽¹⁶⁾

A History of Misinformation

Zimbabwe's proposal to the 11th CoP of CITES claims a total ivory stock of over 24 tonnes, an increase of over 15 tonnes in less than 22 months. This figure does not include the 12 tonnes of ivory reportedly sold from the Zimbabwe Government Central Ivory Store to local ivory manufacturers between February 1998 and January 2000.⁽¹⁷⁾

Zimbabwe's ivory stocks as of 26 February 1998 were recorded as 8.9 tonnes, comprised of 1,786 tusks and pieces. This amount excludes the 19.9 tonnes sold to Japanese buyers in March 1999. Later that year The Zambezi Society noted

"Suspicions are growing that senior officials in the Zimbabwean government are involved in the recent upsurge of poaching".

**The Daily Telegraph
1/12/99**

*Below:
An aerial survey indicated a declining elephant population in 6 out of 13 areas of the Zambezi Valley*



© Craig Gibbon/EA



“with the stockpiles gone, there are no more [ivory] windfalls to be had – only a few tusks a year, from natural mortalities and other minor sources.”⁽¹⁸⁾

The Zimbabwe proposal lists government ivory stocks, as of 12/11/99, and excluding ivory in the Central Store belonging to CAMPFIRE Communities as set out below:

The 333 tusks in the “PO” category, added to the 209 tusks from “unknown” sources means that six tonnes of Zimbabwe’s ivory is of unclear origin.

It is also strange that the average tusk weight for seized ivory is less than half of the other categories. The Zimbabwe authorities claim to have accumulated 15 tonnes of ivory in 22 months,

Source	No. of Tusks	Weight kgs	Average weight kgs
NM- Natural Mortality	430 tusks	4,735.28	11.01
MP- Problem Animal	53	871.85	16.45
MC- Mgmt Mortality (cull)	71	809.80	11.40
MO- Mgmt Mort- other	51	739.75	14.50
LH- Legal Hunting	12	164.50	13.71
SC- Seizure/ confiscation	179	919.35	5.14
PO (*)	333	3,808.80	11.44
UN- Unknown	209	2,178.50	10.42
TOTAL	1,338 tusks	14,227.83	(plus 1,175.23 kgs pieces)

*CITES notification no.984 does not have a code "PO".

*Below:
Zimbabwe's ivory
stockpile figures do
not add up*



© Howard Bussell/Panera



and have sold 12 tonnes of ivory to domestic manufacturers. This means 27 tonnes of ivory has been gathered by the government in less than two years – a suspiciously high amount. There are many worrying discrepancies in the Zimbabwean Government's ivory stock figures that raise concerns about its origin.

The Zimbabwe proposal states: "Despite conducting weekly sales to the local ivory manufacturers and the experimental export to Japan, Zimbabwe has accumulated substantial amounts of ivory. Most is from natural mortality and PAC

(Problem Animal Control) in the case of the Campfire areas." But it gives no explanation of where the government ivory stocks come from.

An insight is provided by a report from the Zambezi Valley area: "A guide who conducts canoe safaris on the river and another conservationist said they had seen large collections of ivory, more than they had seen in previous years, at several National Park's offices but were told that the ivory was all from natural deaths."¹⁰⁹

In the Zimbabwe government figures, tusks of "Unknown" origin total 209, weighing over two tonnes, while almost four tonnes are listed under the unofficial category "PO". The origin of at least 542 tusks weighing almost six tonnes is unknown – equivalent to around 40% of the government stocks. There is also no explanation of the source of the 12 tonnes of ivory sold to domestic buyers in the past 22 months, meaning that around 18 tonnes of ivory passing through government hands is of unknown origin.

Almost a tonne of ivory is registered under the "Unknown" or "PO" categories for stocks owned by Campfire Communities.

The total weight of "Campfire" ivory is given as 8,921.86 kgs in the Zimbabwe proposal but this is incorrect. The true total weight for the figures given is 4,704.73 kgs, with an average tusk

weight of 9.05 kgs.

The CITES Secretariat notes in its "preliminary assessments" of Proposals, under the Zimbabwe Proposal that:

"The proposal provides a detailed summary of ivory stocks under the control of the Management Authority of Zimbabwe, including stocks owned by communities participating in the Campfire programme, indicating a total of 24,435.62 kg in storage.

"No information is provided about the inclusion of ivory of unknown origin or seized ivory in this amount (although the number and weight of tusks seized in Zimbabwe are given in an annex). Zimbabwe appears to accumulate about 5,000 kg of ivory per year without major population reduction exercises."

It also states: "The Secretariat is aware that Zimbabwe has maintained its registration and inventory system developed for the experimental trade of 1999, which records the identity, source and origin of each specimen. It would therefore be relatively simple for the Secretariat to verify that exports of the quota are traced to an appropriate source within Zimbabwe."

Zimbabwe was heavily criticised by the CITES Secretariat in December 1999 for failing to meet its reporting requirements for more than five years. A letter from the CITES Deputy Secretary-General said: "It is of concern that Zimbabwe has fallen behind in the submission of annual reports of trade under CITES. I note that the most recent annual report submitted was for 1994 and that, in effect, none of the recent trade in a range of elephant parts and derivatives has officially been reported as required under Resolution Conf.10.10."

Zimbabwe was heavily criticised by the CITES Secretariat in December 1999 for failing to meet its reporting requirements for more than five years.

Source	No.of Tusks	Weight kgs	Average weight kgs
NM- Natural Mortality	123	1,098.63	8.93
MP - Problem Animal	215	2,248.35	10.46
MC- Mgmt Mortality (cull)	5	42.60	8.52
MO- Mgmt Mort-other	5	42.25	8.45
Legal Hunting	59	198.25	3.36
Seizure/confiscation	17	156.50	9.21
UN – Unknown	44	397.90	9.04
PO	52	520.25	10.00
Total	520 tusks	8,921.86 (plus 110.7 kgs pieces)	

From Zimbabwe's proposal, Table 3 "Ivory in the Central Store belonging to Campfire Communities as of 12/11/99. (*Average weights are not given in the proposal and are calculated by IFA, 23.2.00)



© EIA

*Above:
Victim of "problem"
animal control, Senyati
Camp, Zimbabwe*

He further said that the assessment of recommendations from Zimbabwe on further trade in ivory could not be done due to the lack of reporting to the Secretariat. "It is consequently of great concern to us that Zimbabwe has not participated as required in all monitoring mechanisms established by the Conference of Parties on trade in CITES-listed species."⁽²⁰⁾

Zimbabwe's History of Illegal Ivory Trade

Zimbabwe has one of the two largest domestic ivory carving industries in Africa, principally aimed at tourists. This industry continued during the 1990s, despite the prohibition on cross-border ivory trade. After the CITES ban on international trade in ivory came into effect in January 1990 Zimbabwe government sales of ivory from the Central Ivory Store continued on a weekly basis to domestic ivory manufacturers. Between 1992 and 1995, DNPWLM sales averaged three to six tonnes a year.⁽²¹⁾

In 1996 Zimbabwe's DNPWLM increased their weekly ivory sales to domestic ivory manufacturers nearly nine tonnes in the first nine months of the year alone - more than double that of previous years.⁽²²⁾ Half of this ivory went to a single dealer - a Chinese national - who was

a newcomer to the business.⁽²³⁾

In April 1996, 1,600 kgs of carved ivory hanko (signature seals) from 182 tusks were sold by a single dealer to Japanese customers.⁽²⁴⁾ The export was allowed without any intervention by the DNPWLM, the Police, Customs, or any other Zimbabwean enforcement authority.

In a single week (between 28 June and 5 July, 1996) around US\$19,000 of ivory seals were purchased by customers from China, Thailand and Hong Kong⁽²⁵⁾. The Zimbabwe DNPWLM failed to prevent these illegal sales and exports. Another shipment to Thailand was valued at US\$60,000.

Large commercial quantities of worked ivory were exported by two ivory dealers in Zimbabwe to Japan, China, Thailand, Hong Kong, the Philippines, Indonesia, the USA and South Africa in 1995 and 1996. At that time Zimbabwe held a reservation to the Appendix 1 listing of its elephant population, but had instituted a moratorium on the exports of ivory since 1989.

Zimbabwean National Parks/CITES forms were also issued for the export of commercial quantities of semi worked ivory. The Environment and Tourism Ministry stated that it had acted to withdraw the permits of the two



ivory dealers only the week before the arrival of the CITES Panel of Experts in 1996. Although Deputy Environment and Tourism Minister Edward Chiindori-Chininga said those responsible for the illegal ivory trading would "face the full wrath of the law", the dealers were eventually fined the derisory sum of US\$50.

Ivory was also discovered hidden in bales of tobacco destined for and was seized in South Africa on the Beir Bridge border post with Zimbabwe. The Endangered Species Unit of South Africa state that 45% of the ivory seized in South Africa had passed through Zimbabwe.⁽²⁶⁾

Shooting For Rations and "Problem Animal" Control

Ration hunts for elephants and other large animals such as buffalo are reported to have been suspended recently following the dismissal of the Director of DNPWLM Willas Makombe. In Hwange National Park, 36 bull elephants were reportedly killed for "rations" each year for both the Provincial and Regional Parks HQ.

Nationals Park staff often invited safari guides to take part in the shooting to fulfil the requirements of their Professional Guides licence. Much of the meat allegedly never ended up as Parks ration meat, but was being sold commercially in urban and rural butcheries. An informed source said: "Someone was getting a lot of meat, the central storerooms were filling with ivory and elephant hides from these hunts. Everyone is gaining something except the elephants."

Ration hunts are thought to take place throughout the National Parks. Concern has been expressed that combined with "Problem Animal" Control, and "sport" hunting on the Park boundary, this may affect the numbers of large trophy-sized bull elephants.⁽²⁷⁾

Problem Animal Control has been an area of elephant management open to significant abuse. It has been used as a form of "legal poaching" by corrupt park rangers in several African range States.

In 1999, a tourist couple on safari in Senyati Camp saw two camp elephants shot and killed by National Park rangers. National Park rangers objected to photos being taken of the killed elephants. The elephant hide, now a valuable commodity and the ivory tusks were taken.⁽²⁸⁾

Another source said problem animal control was undertaken on a totally unprofessional basis. The source witnessed 5-6 elephants killed near Sengwa for PAC when only one of the animals should have been killed.⁽²⁹⁾

Kenya

Kenya and India, supported by many other elephant range States from across Africa have proposed to the 11th Conference of the Parties to CITES to relist the elephant populations of Zimbabwe, Botswana and Namibia on Appendix I, following increased elephant poaching in Kenya, Zimbabwe and other range States.

While the southern African countries push for further ivory sales, Kenya is fighting an escalating battle against elephant poachers. At least 67 Kenyan elephants were killed for their tusks in 1999, a marked increase compared with recent years according to Nehemiah Rotich, Director of the Kenya Wildlife Service (KWS). In Tsavo National Park alone 29 elephants were poached, a fivefold increase compared with the previous six years' average. Last year 12 poachers were arrested and ten were killed. One KWS ranger was killed by poachers.

The Kenya Wildlife Service attributes the poaching surge directly to the experimental ivory sales to Japan. The resurgence of ivory trade is also revealed by a sharp increase in seizures of illegal ivory destined for overseas markets.⁽³⁰⁾

EIA visited Kenya in August 1999 to witness first hand the combined effect of a reopened international ivory market and increased pressure on enforcement personnel in Kenya's national parks. EIA visited Park I headquarters in Nairobi where KWS Director Nehemiah Rotich displayed a seizure of several hundred kilograms of poached ivory. Some of the ivory was taken from elephants estimated to have been killed in the second half of 1997 – after the CITES meeting in Harare agreed that international ivory trade could resume.

EIA interviewed KWS staff from the Intelligence and Investigations Departments who confirmed a noticeable increase in dealers offering to buy or sell ivory. Some was old ivory that was being dug up and offered for sale. Prices offered and asked for ivory on the black market were increasing.

EIA visited Tsavo National Park and were given a briefing by well informed and motivated KWS staff. A map displayed spots where elephants had been poached and where poachers had been detected. KWS staff also indicated ivory smuggling routes leading northwards. On the last day of EIA's visit, KWS apprehended a poaching gang that had crossed the border from Tanzania.

Uniquely in Africa, Kenya's wildlife service is predominantly funded by tourism revenues. Park gate fees and tourist lodge revenue currently pay

The Kenya Wildlife Service attributes the poaching surge directly to the experimental ivory sales to Japan.



for 90% of costs.

Both Nehemiah Rotich and Richard Leakey, the former KWS director who now oversees the wildlife service as head of Kenya's Office of the President, fear that re-opening ivory trade will initiate a catastrophic chain of events. They argue that armed battles between poachers and anti-poaching units will result, wrecking the recovering tourism industry and reducing funds available for wildlife protection. Rotich made this argument forcefully during recent visits to Washington D.C. and London to promote Kenya's Appendix 1 elephant proposal. "The tourist industry which funds the wildlife service would be badly hit and we would risk a return to the poaching holocaust of the 1980s."⁽¹¹⁾

Poaching Surges Across Kenya

The largest concentration of elephants in Kenya is found in the Tsavo ecosystem, which covers about 40,000km², including Tsavo East and Tsavo West National Parks and commercial ranches. Tsavo experienced devastating population declines before the ivory ban, reducing the 45,000 strong population to around 5,000 in the 1980s.⁽¹²⁾ The population is still recovering and vulnerable.

In 1999, at least 29 elephants were killed for their ivory in Tsavo's National Parks – five times the average poached during the last six years when the international ivory ban was in place.⁽¹³⁾ An aerial survey in 1999 found that the propor-

*Right:
Poaching in the Tsavo
ecosystem is five time
higher than in 1997*



© David Spong/EIA



*Above:
Bullet hole in ivory tusk
seized by KWS*

tion of recent carcasses was the highest recorded since the late 80s.⁽³⁴⁾ According to the Kenya-based elephant expert Iain Douglas-Hamilton: "If things are going to go bad in Kenya, they'll probably go bad very early on in Tsavo, because Tsavo is such a huge area, it's very difficult to patrol adequately if the incentive for ivory poaching rises."⁽³⁵⁾

There have also been indications that old poaching networks are reviving once again in the remote areas of northern Kenya. Poaching increases have occurred in the Samburu and Laikipia region, home to the largest elephant population outside the protected areas network. Aerial surveys in 1999 counted nine recent carcasses.⁽³⁶⁾ Shortly after the 1997 downlisting elephant poaching incidents took place in the Mukogodo Forest, Mugie Ranch and Il Ngwesi areas. Northern Kenya's proximity to Somalia and Sudan renders the region extremely vulnerable to renewed poaching. It is likely that towns such as Isiolo already act as transit points for ivory poached in the area heading north into Somalia, Sudan and Ethiopia.⁽³⁷⁾

The devastating impact of increased poaching on elephant families is apparent in the number of orphaned baby elephants arriving at a care centre in Nairobi National Park run by the

David Sheldrick Wildlife Trust. In late 1999 the orphanage was caring for 14 baby elephants, the highest number in the Trust's quarter century existence.⁽³⁸⁾

Kenya Emerges as Major Ivory Trade Route

Between 1990 and 1998 the Kenyan authorities confiscated around 3,000 kgs of illegal ivory. In 1999 alone 2,000kgs of illegal ivory was seized - four times the average for the preceding six years. KWS believe that half of this originated outside the country. The Director of KWS reported: "We have seen the re-opening of traditional ivory routes through northern and eastern Kenya and at the border with Somalia".

In July 1999 over 350kg of ivory was seized in Maralal, 300km north of Nairobi. The seizure included 45 pieces of ivory at three different sites and represented at least 23 elephants. The size of the largest tusks suggest they came from the Tsavo population. A further consignment of 65kg (4 tusks) was later recovered.⁽³⁹⁾ Poachers continue to kill elephants for their ivory in the Samburu and Laikipia Districts, despite many losing their lives in battles with the anti-poaching units.⁽⁴⁰⁾

Kenya has also emerged as a key transit coun-



Right:
Illegal ivory seized from a
North Korean diplomat
at Nairobi Airport,
August 1999



© Ellen Dausch/Asian Eye

try in the movement of illegal ivory. In March, a massive two tonne ivory seizure in Dubai was confirmed to have come from Kenya, though the exact origin of the ivory is unknown.⁽⁴¹⁾ The seizure took place on 18th September 1999, one of the largest ivory seizures since the international ivory trade ban was implemented in January, 1990.

KWS has recently highlighted the role of diplomats and government personnel as key culprits in ivory trafficking, in particular North Korean diplomats. In August 1999 over 700kg of ivory representing 188 tusks was seized at Nairobi airport. It was the largest seizure in Kenya for over a decade. The ivory, which originated from Cameroon, was being carried by a North Korean diplomat on route to North Korea

via Dubai and Beijing.⁽⁴²⁾ The ivory came from West or Central African elephants and was packed in 12 specially designed boxes.⁽⁴³⁾

Kenya maintains that ivory trade should not be allowed at least until an effective international monitoring system with sufficient baseline data is in place, and until African countries have the resources to achieve the necessary level of enforcement in the field and effective customs control of illegal ivory.

The Director of KWS has appealed to governments to support Kenya's proposal to uplist the southern African elephant populations at a recent press conference: "We hope that it will not take the deaths of any more elephants before the world can recognise the threat that the ivory trade poses to our elephants."⁽⁴⁴⁾

Below:
Part of the 350kg of
ivory seized in Maralal,
northern Kenya,
July 1999



© David Sibon/ELI



© Juliana Ruyffers/ISA

Consumer Demand Rising

While the international ivory ban led to the virtual elimination of the market for ivory in Europe and the US, demand from Asian countries persists. Japan has long been the largest and most lucrative end market for ivory, while China and Hong Kong have served as carving and trade centres. Eighty per cent of major ivory seizures since 1989 were destined for Asian markets.⁽¹⁾

In particular, Chinese domestic demand for ivory products appears to be growing rapidly against the backdrop of an expanding economy and middle class. Elephant range States such as Kenya have recently expressed concern that China is emerging as a major new market for illegal ivory, which could further stimulate poaching activity in their countries.

China

Historically both China and the territory of Hong Kong have played a major role in the global ivory trade. Prior to the international ban China was renowned for the skill of its carvers and was home to some of the largest ivory carving factories in the world. Hong Kong was a major conduit for ivory moving between Africa and markets in both the West and East. By 1989 more ivory was moving through the territory than any other market, and Hong Kong was the largest supplier of worked ivory products.

Today ivory is still available in substantial quantities in both China and Hong Kong, although long-established carving operations declined significantly throughout the 1990s. Weak enforcement allows the movement of ivory between Hong Kong and China and to export

*Above:
Tusk being polished at
Daxin Ivory Carving
Factory, Guangzhou*



returned from a construction site.⁽⁹⁾

- **September 1999:** Customs inspectors in Ruili, Yunnan province seize the largest amount of wildlife products since 1949 including 11 elephant tusks.⁽¹⁰⁾
- **August 1999:** Customs at Nairobi airport seized 188 elephant tusks weighing approximately 700kg from a North Korean diplomat. The ivory was en route from Cameroon to China via Dubai.⁽¹¹⁾
- **August 1999:** Customs in Guangdong province asked a local ivory expert to inspect two wooden crates containing 300 pieces of African ivory abandoned at a port. The fate of the seized ivory is unknown.⁽¹²⁾
- **April 1999:** Russian customs officials at Moscow airport seized half a ton of ivory tusks from the wife of a North Korean diplomat who was flying from Lagos, Nigeria to Beijing, China.⁽¹³⁾
- **January 1999:** Customs officials in southern China seized 221 pairs of elephant tusks, weighing more than two tonnes. The ivory was hidden in a consignment of timber shipped from South Africa to Wuzhou City, in Guangxi province. Six people were arrested, including a trader from Hong Kong.⁽¹⁴⁾
- **November 1998:** Chinese customs officials seized 1.6 tonnes of African ivory hidden among a shipment of wild ox horns. The

seizure occurred in the port of Zhanjiang, Guangdong province.⁽¹⁵⁾

- **October 1998:** A North Korean diplomat travelling from Cameroon to China was briefly detained at Paris airport after officials found 600 kg of elephant tusks in 20 suitcases.⁽¹⁶⁾

EIA Far East Investigation

In a series of undercover trips between December 1999 and February 2000 EIA investigators visited ivory carving factories and retail outlets in Hong Kong, Guangzhou and Beijing to examine the present level of the ivory trade in the region.

While the traditional carving factories appeared to be in terminal decline, other newer operations were expanding. In particular the Yue Ya company, based in Guangzhou, has risen to become a major player in China's ivory trade. The firm was established in 1990 by a carver formerly employed at the Daxin Ivory Carving Factory, once the second largest factory in China. Yue Ya opened a second division in 1997 - and the firm now has three retail outlets around Guangzhou, and carving factories in both Beijing and Guangzhou.

While its sales brochure extols the virtues of China's ivory carving heritage, its shops also stock a large number of smaller mass-produced items such as signature seals and bracelets. It also

Customs officials in southern China seized 221 pairs of elephant tusks, weighing more than two tonnes.



Left: Guangzhou based company Yue Ya's ivory business is growing.



The Chinese government is involved at all levels of the ivory trade.

produces machine-carved figures. In addition to its own retail chain, Yue Ya supplies ivory products to shops and hotels in a number of cities, including government-owned Friendship Stores in Shanghai, Dalian and Guangzhou.

During a meeting with one of the company directors, Mr Ou, EIA investigators were offered the opportunity to purchase ivory items which could be delivered to Hong Kong to ease export. If a larger order was placed, Mr Ou said he had a contract in the Guangdong provincial government who could arrange an export licence.

When asked about the origin of the raw ivory used by his factories, Mr Ou said he bought it from the government-owned Guangdong Import and Export Corporation, which he claimed bought a large amount of ivory just before the trade ban. However, the headquarters of this company denied ever having been involved in the supply of ivory.

Mr Ou told the investigators the vast majority of Yue Ya products were carved recently, adding that business had grown over the last couple of years. He also revealed that he has increased production recently to build up a good stock of products in anticipation of a further relaxation of the ivory ban.

A factory visited in the Special Economic Zone of Zhuhai, near Macao, was busy churning

out small carved figures. Leung Fat, a three-generation ivory carving family enterprise, employs 40 young carvers recruited from the less economically-developed areas of China. While the factory produces mammoth and hippo tusk carvings for its outlet in Hong Kong, it is still engaged in ivory carving. Several of the ivory designs were clearly intended for the Japanese market. The manager of the factory explained how ivory is sent to clients in Japan, Europe and the US disguised in mammoth and hippo shipments.

By contrast traditional carving factories visited were in obvious decline, with a much-reduced and aging workforce. The Daxin Ivory Carving Factory, formerly China's second largest operation employing over 600 people, had lost half of its former factory space to a hotel development. Although company representatives claimed to have 50 carvers, only three were observed at work.

A visit to a second traditional carving company in Guangzhou, called Ngai Gong Ivory Factory, found a similar situation. Only four carvers were seen at the work, and the government-owned firm had sublet part of its premises. The factory manager Mr Lai claimed to have enough raw material for a couple of years, but added that he had been approached on several occasions by people trying to sell illicit ivory.¹²

Right:
Leung Fat's busy carving operation in Zhuhai economic zone





As the larger factories in Guangzhou have gone into decline, many of the former carvers have gone into business for themselves, often working from home. Three retail shops in the Jade Market area of Guangzhou claimed to obtain their carved products through these channels. These shops all claimed to obtain raw ivory through government trading companies, which is then provided to the carvers.

EIA investigators also visited the Beijing Ivory Carving Plant, in China's capital, and once the world's biggest source of carved ivory.⁽¹²⁾ Again the factory had scaled down operations dramatically, with only a handful of carvers and a hotel occupying part of the former factory site. The factory manager showed the investigators a storeroom full of carved ivory figures, and said that export papers could be arranged through the company Beijing Gongmei Corporation.

Beijing Gongmei owns the large Beijing Arts and Crafts Store and oversees the ivory factory. During a meeting with export manager Bao Hua Li, EIA investigators were offered CITES papers to cover the export of ivory products. A copy of a permit covering a forthcoming shipment to Japan was displayed, claiming that the ivory originated from Kenya in 1975 and was endorsed by China's Ministry of Forestry.

Li explained that the government was willing to issue such permits a few times each year, and that the government had advised him to deal only in large or valuable shipments of ivory to maximise each permit. He confirmed arranging an earlier permit in 1999 to cover the export of ivory to Japan on behalf of the Daxin factory.

It is clear that in addition to meeting a growing domestic demand, China's ivory industry continues to supply overseas markets. Both Daxin and Beijing Gongmei have made government-endorsed sales to Japan, and EIA investigators were offered CITES permits, although the pre-convention status of the material was highly suspicious. Leung Fat sends ivory overseas hidden in consignments of mammoth and hippo tooth carvings, while one shop visited in Guangzhou deals almost exclusively with Taiwanese customers.

The Chinese government is involved at all levels of the ivory trade. From retail through its Friendship Stores, supply of raw ivory to carvers, ownership of carving factories such as Daxin, and arranging export licences.

While the traditional carving factories are in terminal decline, the expansion of companies like Yue Ya, the widespread availability of ivory products, and the increasing number of seizures destined for China, point towards a thriving

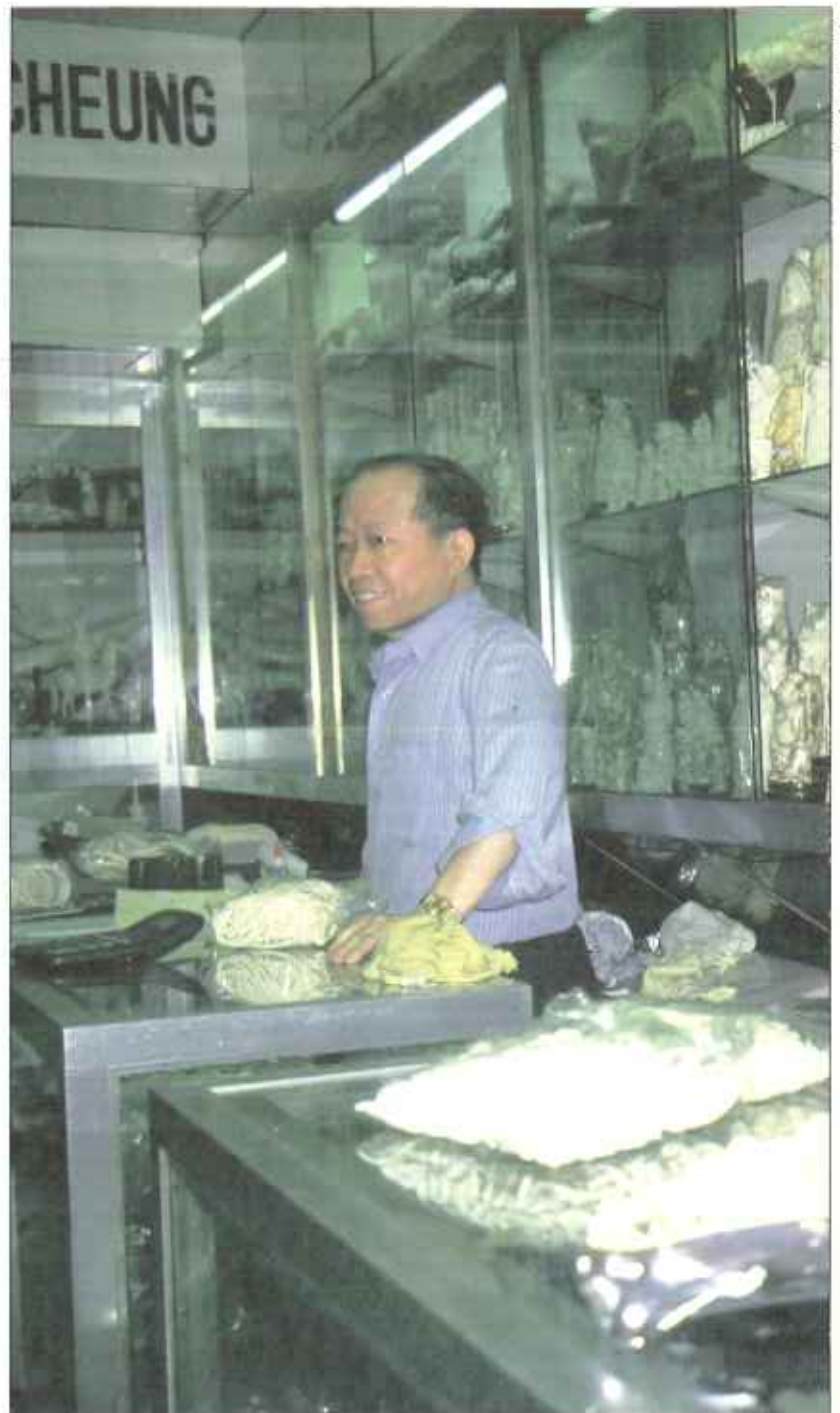
black market in ivory and growing local demand.

Hong Kong: Ivory Traders Target Tourist Market

At the time of the international ivory ban Hong Kong had a huge stockpile of almost 500 tonnes of raw ivory and 168 tonnes of worked ivory.⁽¹³⁾ By early 2000 the amount of registered ivory had shrunk to around 260 tonnes, of which 160 tonnes was raw ivory.⁽¹⁴⁾

Under Hong Kong law every individual possessing five kilos or more of ivory must register with the authorities. Imports and exports of

*Below:
Yuta Cheung in Hong
Kong offered to export
ivory labelled as bone*



© Justin Rutherford



**EIA
investigators
were offered
ivory for export
in many of
Hong Kong's
ivory shops.**

ivory are prohibited, including trade with mainland China.

The decline of the ivory business in Hong Kong is illustrated by the fact that in 1989 the telephone directory listed 264 entries under the heading "Ivory Goods - Wholesale and Manufacturing". By 2000 the number had shrunk to 43. Many of the remaining factories and retail outlets have switched to carving mammoth ivory or hippo tusk.

Yet a substantial retail trade in ivory still exists, and targets the tourist trade despite Hong Kong's strict laws. EIA investigators were offered ivory for export in many of Hong Kong's ivory shops. The company Shui On confirmed sales of ivory to tourists from the US, Japan and Europe. The shop Sam Hing spoke of regular ivory sales to an American client, while Yuta Cheung offered to label large ivory carvings as bone to allow export. With the stockpile shrinking by over ten tonnes a year and local demand for ivory low, it is clear that considerable amounts of worked ivory are leaking from the territory.

In spite of the fact that transport of ivory between Hong Kong and the mainland is prohibited, EIA uncovered strong links between a number of Hong Kong ivory businesses and mainland China. Within China both Yue Ya and

Leung Fat spoke of their ability to move ivory across the border. The owner of the Leisure Corner shop in Hong Kong told how he obtains carved ivory figures from China, while the assistant manager of the Kowloon firm Pak Lok spoke of a secret factory in southern China where the firm continues to carve ivory.

Japan

As both the world's largest consumer and a major destination for illegal ivory Japan has dominated the global ivory trade for decades. Between 1979 and 1989 Japan imported a massive 2,827 tonnes of raw ivory.⁽¹⁵⁾⁽¹⁶⁾

Yet, due to Japan's inadequate trade regulations, a 1984 estimate suggested that at least two-thirds of these imports were suspect.⁽¹⁷⁾

Although demand for ivory declined after the ban, the Japanese ivory trade continued to flourish underground with production and sales of ivory hankos (personal seals) and trinkets far outstripping the meagre stocks of ivory held legally in Japan when the ban came into force.

While Japan tightened its ivory management regulations during the 1990s in response to international criticism, the system remains

*Right:
Illegal ivory seized in
Paris en route to Japan,
December 1999*



© French Customs and Excise

ridden with loopholes, encouraging the widespread laundering of illegal ivory. The legal sale of 49.5 tonnes of ivory to Japan provides a further opportunity to launder illegal ivory.

Japan's Illegal Trade

Even before the global trade ban was imposed, Japan was a major recipient of illegal ivory, its insatiable demand fuelling the elephant poaching holocaust of the 1980s.

EIA identified large-scale smuggling of ivory through Dubai to Japan or to Japan via Hong Kong in the late 1980s.⁽¹¹⁸⁾ Black market routes for ivory have long existed between Hong Kong and Japan. In the early 1990s there were at least ten seizures of illegal ivory entering Japan from Hong Kong. In one case Japanese customs officers found over 31,700 ivory hankos hidden among shipment of cosmetics from Hong Kong.⁽¹¹⁹⁾ Recent reports point towards continuing links between Hong Kong-based ivory traders and their Japanese counterparts.⁽¹²⁰⁾

Since the 1990 CITES ban on international ivory trade, many routes for smuggling ivory into Japan have been identified, including via the Philippines, Korea, Taiwan, Singapore, Dubai and Europe.⁽¹²¹⁾

Stockpiles and Consumption Rates: Business as Usual?

Japan has altered its method of auditing ivory stocks on several occasions, rendering meaningful insights into the size of the black market elusive. In 1989 it was predicted that the estimated stocks of less than 100 tonnes would be exhausted within one or two years. By 1993 the stockpile had fallen to 76 tonnes, yet by late November 1996 ivory dealers held 80 tonnes of raw tusks and 98 tonnes of ivory pieces.⁽¹²²⁾

Following the ban, the volume of ivory sold in Japan fell, but remained robust. In 1991, 59 businesses alone had combined sales of 69.9 tonnes,⁽¹²³⁾ and sales of officially certified hankos amounted to 58 tonnes between July 1995 and 31 Dec 1996.⁽¹²⁴⁾ As each hanko represents just 33-60% of the ivory consumed in the manufacturing process (the rest being usable or unusable waste),⁽¹²⁵⁾ this would require 64-116 tonnes of raw ivory per year. However in 1996 Japanese government agencies reported that stocks were falling by only 10 tonnes a year.⁽¹²⁶⁾ This begs the question: where has all the ivory come from to meet domestic demand and tally with the sales figures reported by retail outlets? The most obvious answer is illegal trade.

Since the 1990 CITES ban on international ivory trade, many routes for smuggling ivory into Japan have been identified.



*Left:
Ivory hankos on sale in
Japan*



“There is no market for illegal ivory in Japan.”

***Jim Armstrong
(CITES Deputy
Secretary-
General)***

*Below:
Despite CITES
secretariat denials, Japan
remains a destination for
illegal ivory...*

Illegal Ivory Trade Routes

In October 1999, the CITES Deputy Secretary-General stated categorically that a market for illegal ivory in Japan no longer exists following the experimental “one-off” sale of 49.5 tonnes in April 1999.

Jim Armstrong
(CITES Deputy Secretary-General):
“...there is no market for illegal ivory in Japan”.

Interviewer:
“You mean no illegal ivory goes into that market?”

Jim Armstrong:
“Exactly”.

5th October 1999, Newshour, BBC World

Yet the facts demonstrate otherwise. On 1st December 1999 at Paris Roissy Airport French

authorities seized 420 kg of freshly carved, ivory figurines from Rwanda en route to Japan. The smuggled cache was part of a one tonne shipment of African art going to an otherwise legitimate exhibition in Tokyo, organised by the Japan External Trade Organisation. The consignment was due to have been shipped to Japan via the Rwandan Embassy. Such a convoluted route confirms an on-going market for illegal ivory in Japan. Another smaller seizure of 20kg was made soon afterwards, and a French Customs officer stated his belief that other shipments might have reached Japan prior to the seizure.⁽⁷⁷⁾

Recent EIA investigations in Hong Kong and China indicate widespread transport of small ivory consignments by couriers travelling to Japan. Ivory factories in both Guangzhou and China recently exported ivory to Japan, and many ivory carvings on display in Hong Kong and China are Netsuke style and clearly intended for the Japanese market.

EIA investigations in South Korea also found ivory hankos designed for the Japanese market.

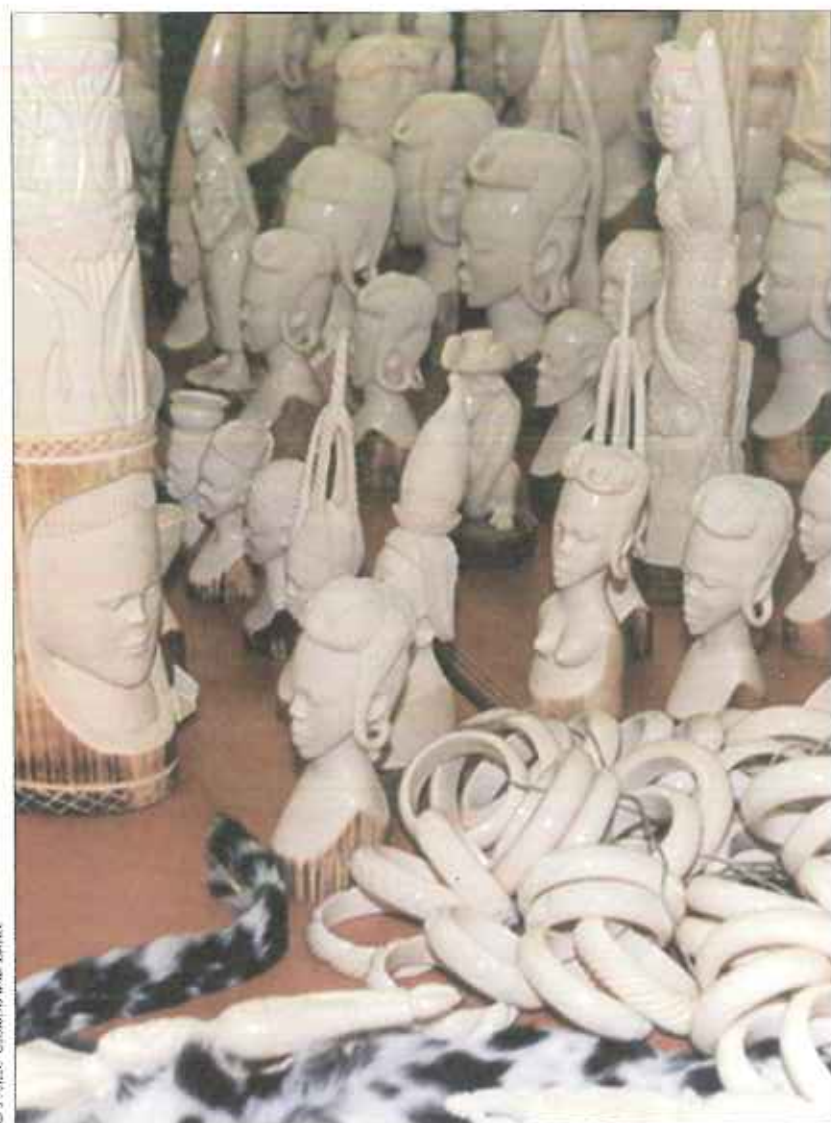
Japan's Appalling History of Wildlife Trade Enforcement

Despite joining CITES in 1973, it took Japan seven years to finally ratify the treaty following intense international and domestic criticism. Even then, Japan held more reservations on species than any other nation.⁽⁷⁸⁾ It also failed to enact new legislation to implement CITES and regulate domestic trade, relying instead on inadequate amendments to existing regulations. In 1984 other CITES signatory nations took the exceptional action of adopting a resolution condemning Japan's appalling record. In 1987, a full 14 years after signing the convention, Japan finally brought into force a new national law to implement domestic measures complying with CITES.

Three years later, Japanese officials openly admitted that they decided against taking a reservation against the 1990 ivory ban only because they wished to “avoid Japan's isolation in the international community”.⁽⁷⁹⁾

The Failure of Japan's Amended Ivory Management System

In 1994 Japan amended its ivory management regulations in response to a CITES requirement that potential ivory importing countries should



implement strict controls on domestic ivory trade. The changes, however, failed to halt a steady flow of illegal imports into the Japanese domestic market. In 1997 Traffic reported that:

“Seizure information worldwide points to regular, organised smuggling of semi-worked ivory blocks...aimed at the Japanese market.”⁽¹⁰⁾

The inadequacy of the new Japanese controls were confirmed by the CITES Panel of Experts in 1997:

“The control of [Japan’s] retail trade is not adequate to differentiate the products of legally acquired ivory from those of illegal sources...More inspections are needed, including physical checking of stockpiles.”

In response to this criticism the regulations were amended yet again in readiness for the southern African stockpile sales to Japanese buyers in April 1999. Yet this latest system, which came into effect in March 1999, still enables illegal ivory to be easily laundered:

- Transaction data is now recorded by all dealers, but to trace the transaction chain of even one retailer’s ivory items would involve collecting ledgers from every wholesaler used by the retailer, and from all the manufacturers used by those wholesalers. All the data would then need matching up. With up to 50,000 hanko retailers in business,⁽¹¹⁾ this process is hopelessly time-consuming, and prevents frequent or efficient inspections. In 1999, Japan’s Ministry of International Trade and Industry and the Environment Agency visited just six ivory businesses a week, 200 in total.⁽¹²⁾
- The voluntary product-certification scheme for ivory goods is used by perhaps less than 10% of the retail trade, and is applied in a very “hit and miss” fashion.⁽¹³⁾ As transactions can be made for uncertified pieces, there is no way to be certain that an item described in a ledger is the same as the one found on inspection of stocks.
- Ivory may change form at each stage of transaction up to the retailer, so amounts and units also often change at each stage. Furthermore, manufacturers are required to record *weights* of ivory items, but wholesalers and retailers record *number* of items traded, so descriptions in ledgers inevitably lack consistency.
- The revised system is limited to hankos, not any other ivory products.
- Dealers are not obliged to report regularly on stocks and the authorities have no plans to establish a database to compile data collected, largely preventing meaningful monitoring.

- The maximum punishment for dealers violating the rules is suspension of business for just 3 months, and there are no powers to confiscate or prevent the sale of illegal ivory.

Japanese public consumption is clearly far greater than official stockpiles allow for, pointing to a strong demand being met with illegal ivory. It remains impossible to identify which items on sale in tens of thousands of shops across Japan are made from which sources of ivory - legal or illegal. The punishments meted out to those dealing in illegal ivory are too lenient to act as a deterrent, and illegal ivory cannot readily be eliminated from the system.

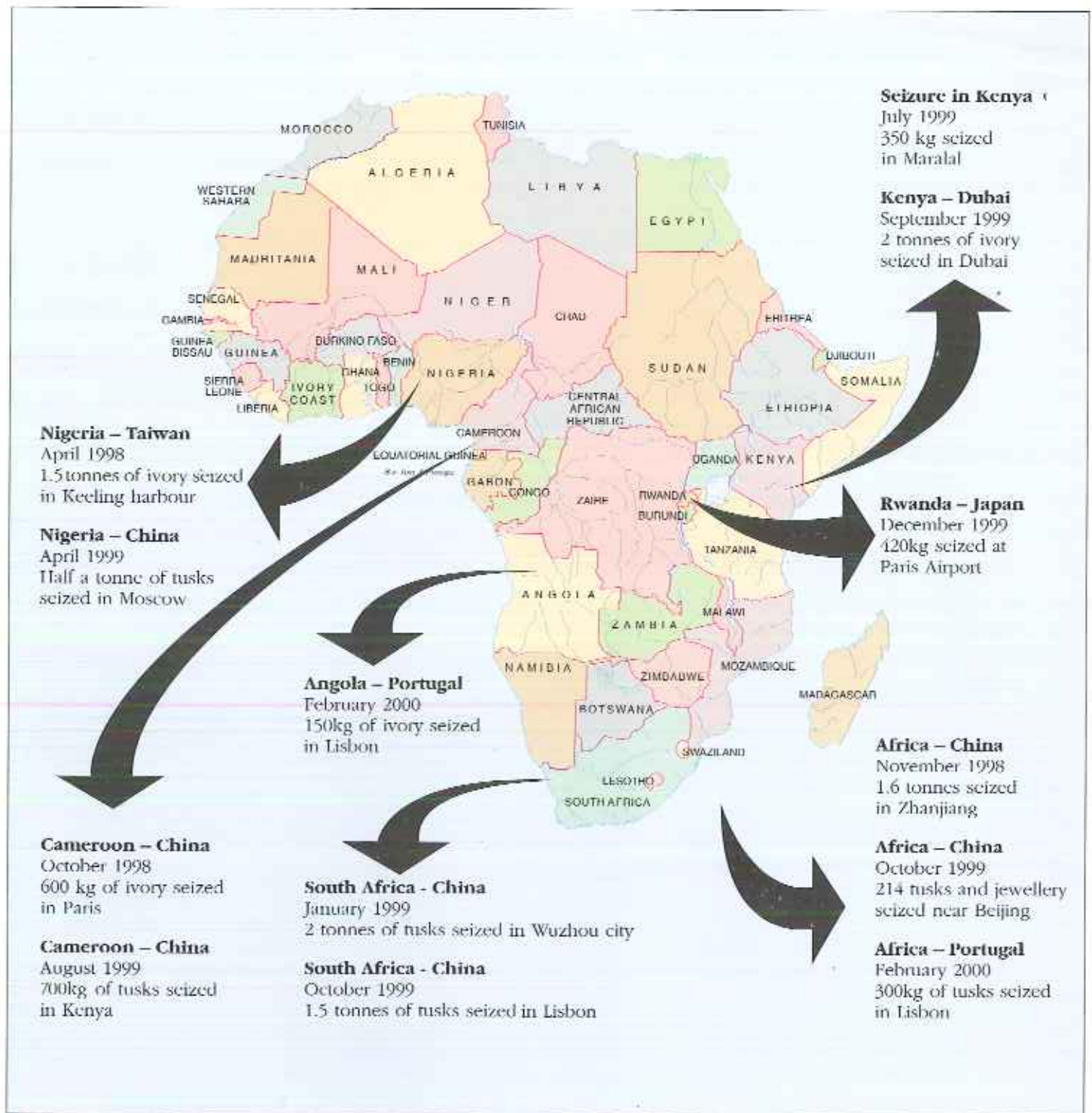
The Japanese government has repeatedly shown a lack of political will to enforce controls on the domestic ivory trade. Further CITES-approved ivory imports by Japan will only provide increased opportunities to launder poached ivory.

French authorities seized 420 kg of freshly carved ivory figurines from Rwanda en route to Japan.

*Below:
...as this seizure in
December 1999
of Japan bound ivory in
Paris shows*



© French Customs and Excise



Ivory Seizures Soar

Since the 1997 decision to permit a partial reopening of the international ivory trade, some of the largest seizures of illegal ivory made in the decade have been reported.

April 1998 Taiwan

Customs in northern Keelung harbour intercepted a container of ivory belonging to a local importer call An Chung. The shipment was marked as containing teak products, but contained tusks and worked ivory from Nigeria reported to be worth US\$ 3 million.⁽⁵¹⁾

October 1998 Paris

A North Korean diplomat travelling from Cameroon to China is detained in a Paris airport after customs officials found 600 kg of elephant tusks in 20 suitcases.⁽⁵²⁾

November 1998 China

Chinese customs in the southern port of Zhanjiang seized 1.6 tonnes of African ivory hidden among 8.9 tonnes of African wild ox horns.⁽⁵³⁾

29th April 1999 Moscow

Russian customs officials seized over half a tonne of elephant tusks from the wife of a North Korean diplomat on route to Beijing



in China. The woman, named as O Meng Khi is the wife of a second secretary at North Korea's embassy in Nigeria.⁽³⁷⁾

29th July 1999 Kenya

Over 350kg of ivory are seized in Maralal, 300km north of Nairobi, the biggest illegal ivory seizure in Kenya since 1989. The seizure includes 45 pieces of ivory at three different sites, taken from at least 23 elephants. Kenya Wildlife Service suspects Bangkok or Taiwan to be the final destination. Two people are arrested in the operation, which is carried out by the Lusaka Agreement Task Force.⁽³⁸⁾

January 1999 China

Customs officials in Wuzhou city seized 221 pairs of tusks weighing more than two tonnes hidden in a shipment marked timber from South Africa.⁽³⁹⁾

30th August 1999 Kenya

188 elephant tusks weighing approximately 700kg packed in 12 specially designed boxes are intercepted at Jomo Kenyatta International Airport in Kenya. The consignment labelled "Electronic Sanitex Group SRL" is en route from Cameroon to China. A North Korean diplomat (First Secretary of the Democratic People's Republic of Korea in the Republic of Equatorial Guinea) is charged in a court of law. Pleading not guilty he is released on a US\$ 22,857 (Ksh 1.5mill) bond with a Kenyan surety of equal amount.⁽⁴⁰⁾

18th September 1999 Dubai

Two tonnes of ivory hidden in 41 containers is seized by customs at Dubai airport. The ivory originated in Kenya.⁽⁴¹⁾

22nd October 1999 Portugal

150 tusks weighing approximately 1.5 tonnes are seized near Lisbon in Portugal in a joint operation between the Portuguese and South African police. The arrested men (one South African and 3 Portuguese) are part of a smuggling ring that operates between Europe and Southern Africa. The tusks were shipped four years ago with other goods from South Africa to Lisbon, probably having originated from Angola, Namibia and South Africa and thought to be destined for China. Approximately half of the original consignment of around four tonnes had been sold immediately. The total black-market value of the seizure was US\$300,000.⁽⁴²⁾

21st October 1999 China

Tianjin customs near Beijing seize 102 un-carved tusks, 112 roughly carved tusks and 3249 pieces of jewellery from workers returning from Africa. The ivory was hidden

amongst 55 tonnes of old machines returned from a construction site.⁽⁴³⁾

1st December 1999 Paris

420kg of ivory is seized at Paris Roissy airport. The cargo of carved figurines is hidden in a container of African handicrafts shipped from Rwanda and destined for an embassy address in Japan.⁽⁴⁴⁾

February 2000 Portugal

At least 300kg of tusks were seized by police in Lisbon after a tip off. The tusks were in a van on route to a house and had all been prepared for carving. As the tusks are particularly large and weigh around 30kg each it is assumed that the ivory is from Africa.⁽⁴⁵⁾

A further 150kg of tusks and worked ivory is seized on 22nd February by customs in Lisbon. The ivory is hidden in a container said to hold clothes, china and furniture, imported by an Angolan student living in Portugal.⁽⁴⁶⁾

*Below:
Part of the 1.5 tonnes of
tusks seized in Lisbon,
October 1999*



© Marko Svedic/STV



Above:
June 1997 – first case of
elephant poaching in
Ghana's Mole NP since
the 1980s

Conclusions

The 1997 decision by the CITES 10th CoP in Harare permitted an "experimental" sale of ivory from Zimbabwe, Namibia and Botswana to Japan. The CITES process in 1997 and subsequently, has been plagued by a lack of transparency, mismanagement and inadequate consultation with elephant range states. **The CITES ivory experiment has failed.**

Elephant poaching levels have risen in a number of range States since 1997. A November 1999 aerial survey in Zimbabwe's Zambezi Valley estimated 1,378 carcasses, the majority between one and two years old. Poaching has risen in Kenya and ivory seizures have increased. The CITES guaranteed safeguard of an international monitoring system to detect increased elephant poaching is non functional.

Since 1997 the scale of ivory seizures around the world has risen dramatically, compared with the rest of the decade when the international ivory ban was in place. The majority of the largest seizures of the 1990s have taken place in the last two years, including 1.5 tonnes in Taiwan, 1.6 tonnes and over two tonnes in China, and two tonnes in Dubai.

Investigations by EIA in China reveal substantial quantities of illegal ivory entering the country, growth in domestic demand, continuing exports and government involvement at all levels of the ivory trade. Ivory is being illegally exported from the territory of Hong Kong principally through the tourist trade.

The seizure of an illegal ivory shipment at a Paris airport in December 1999 shows that Japan continues to offer a market for smuggled ivory, despite protestations from the CITES Secretariat

to the contrary, Japan's system of internal ivory control remains woefully inadequate.

Despite suffering increased elephant poaching Zimbabwe is proposing further ivory sales. Many of the ivory stockpile figures supplied by the Zimbabwe authorities do not add up. The authorities have accumulated 27 tonnes of ivory in just 2 years – a suspiciously high amount. Conversely Kenya, also witnessing an upsurge in poaching, is proposing to restore all elephant populations to CITES Appendix 1, thereby banning the international trade in ivory.

Recommendations

- support the proposal by Kenya and India to transfer all elephant populations to Appendix I;
- oppose proposals for annual quotas of ivory, elephant hide or live elephant sales by Zimbabwe, Botswana and Namibia;
- oppose, in any form, the proposal by South Africa to downlist the South African elephant population;
- institute an immediate investigation into the origin of the claimed ivory stocks in Zimbabwe's Central Ivory Store and of the alleged poaching cover up by the Zimbabwe Department of National Parks and Wildlife Management.
- support funding for the Lusaka Agreement and urge African range states to join.
- support efforts by elephant range States to improve their enforcement capacity and elephant security by increased funding.



Killing the Ivory horn

- 1 Sulumar, 1997. Reversing Policies of Protection, *Faunaflora*, July 1997
- 2 Decision 10.1 Part A (a, d, e, f, h)
- 3 Decision 10.1 Part A (g)
- 4 Decision 10.1 Part A (j)
- 5 Decision 10.1 Part A (k, l)
- 6 Decision 10.1 Part B
- 7 TRAFFIC and IUCN/SSC Workshop Report 16 January 1998. *Monitoring of Trade in Elephant Products and Illegal Killing of Elephants*, Nairobi, Kenya 8-12 December 1997
- 8 WWF Southern Africa Regional Programme Office (WWF SARPO), October/November 1999. *Aerial Survey of Elephants and Other Large Animals in the Zambezi Valley Floor and Dande Safari Area/Caruue Communal Lands*
- 9 Confidential pers comm. to EIA, 1999
- 10 CITES Doc. SC.40.5.2.2
- 11 CITES Notification No. 1998/09
- 12 CITES Notification No. 1998/10
- 13 CITES Notification No. 1998/10
- 14 N. Rorlich, Director KWS, pers comm. to A. Thornton, EIA
- 15 CITES Notification No. 1999/12
- 16 CITES Doc. SC.40.5.2.2
- 17 CITES Notification No. 1998/09
- 18 CITES Doc. SC.40.5.2.2
- 19 Memo from Ian Douglas Hamilton, AIFSG, to Simani Sesiwari, IUCN, Feb 1999
- 20 Memo from Susan Stuart, IFAW to IUCN/SSC Elephant Specialist Group members, 9 March 1999
- 21 CITES Doc. SC.41.6.1 Rev
- 22 CITES Doc. Inf. SC.41.12
- 23 US Statement at Standing Committee 41, February 1999
- 24 WWF International, Briefing to SC51, January 1999
- 25 CITES Doc. SC.41.6.4 Rev 2
- 26 CITES Notification No. 1999/18, 12 March 1999
- 27 CITES Doc. SC.41.6.4 Rev 2
- 28 CITES Notification No. 1999/93
- 29 CITES Notification No. 1999/93
- 30 TRAFFIC Dispatches No. 13, February 2000
- 31 TRAFFIC 2000, *Ibid*
- 32 CITES Doc. SC.41.7.1
- 33 CITES Doc. SC.42.10.2.1
- 34 CITES Doc. 11.31.2 Monitoring of Illegal Trade and Illegal Killing
- 35 CITES Doc. SC.41.6.3
- 36 CITES Doc. 11.31.2 *Ibid*
- 37 WWF Int, 1999, *Ibid*
- 38 Minutes of AIFSG meeting, October 1998, Harare

Elephant poaching usage

- 1 EIA Internal Report, 1997
- 2 Nedy Tucker, Widespread poaching of African elephants could make them endangered again, *Knights Ridder & Tribune News Service*, 2 December 1999
- 3 WWF Southern Africa Regional Programme Office (WWF SARPO), *Aerial Survey of Elephants and Other Large Animals in the Zambezi Valley Floor and Dande Safari Area/Caruue Communal Lands*, October/November 1998
- 4 Confidential pers comm. to EIA, September 1999
- 5 Nedy Tucker, 2.12.99 *Ibid*
- 6 CITES Prop. 11.7.3
- 7 Nedy Tucker, 7.12.99 *Ibid*
- 8 WWF-SARPO, 1999 *Ibid*
- 9 Douglas-Hamilton, L., Michaelmore, F. and Inamdar, A. 1992. *African Elephant Database*. UNEP, Feb 1992, 176pp.
- 10 Confidential pers comm. EIA, September 1999
- 11 Nedy Tucker, 2.12.99 *Ibid*
- 12 Masland, T. *Aiming at the Elephants*, *Newsweek International*, December 15, 1999
- 13 Poachers kill 84 elephants this year, *Herold Reporter* 22 Nov 1999
- 14 D. Blin, *Elephant slaughter 'not' checked*, *The Daily Telegraph*, 1 Dec 1999
- 15 M. Cadman, pers comm, 1999
- 16 Confidential pers comm. to EIA, 9 September 1999
- 17 TRAFFIC: East/Southern Africa, 2000 In *Int. IUCN/SSC Wildlife Trade Programme*, reported in *SSC Analyses of Proposals to Amend the CITES Appendices*
- 18 *Zambezi Society Bulletin*, 9 August 1999
- 19 M. Cadman, 1999, *Ibid*
- 20 V. Kahiya, *Poaching threatens ivory trade*, *Zimbabwe Independent* 10 December 1999
- 21 Report of the CITES Panel of Experts on the African Elephant, February 1999
- 22 CITES Panel of Experts report, *Ibid*
- 23 *The Mail and Guardian*, South Africa, 6 December 1998
- 24 CITES Panel of Experts report, *Ibid* *Mail and Guardian*, 6/12/98 *Ibid*
- 25 CITES Panel of Experts report, *Ibid*
- 26 CITES Panel of Experts report, *Ibid*

- 27 Confidential pers comm. to Allan Thornton, EIA, January 2000
- 28 Confidential pers comm. to EIA, 1999
- 29 Confidential pers comm. to EIA, 1999
- 30 Kenya says elephant poaching sharply up, *Reuters News Service* 28/1/00
- 31 P. Ghazi, *Ivory towers*, *The Guardian* March 8, 2000
- 32 King, J., Kahanba, P., Omondi, P. and Douglas-Hamilton, L. 1999. *The Status of Kenya's Elephant Populations*, September 1999
- 33 *Lifting of Cases 'is encouraging poaching'*, *Reuters* 22 Nov 1999
- 34 King et al. 1999 *Ibid*
- 35 I. Douglas-Hamilton in an interview with EIA, August 1999
- 36 King et al. 1999 *Ibid*
- 37 EIA 1997 *Ibid*
- 38 *The David Shepherd Wildlife Trust Newsletter for 1999*
- 39 N. Rorlich, Director KWS, pers comm. to EIA, August 1999
- 40 KWS Press Release, 19 Jan 2000
- 41 KWS Press Release, 1 March 2000
- 42 KWS Press Release, *Ibid*
- 43 P. Kahanba, KWS, pers comm, March 2000
- 44 N. Rorlich, Director KWS, *Ivory Press Service*, 22/2/2000

Consumer demand rising

- 1 Dublin H, McShane T, Newby J, 1997. *Conserving Africa's Elephants*. WWF International
- 2 Laurie, 1989. *The Ivory Trade in China*. In: *The Ivory Trade and the Future of the African Elephant*, Ivory Trade Review Group, Oxford, UK
- 3 *Reuters*, 21 October 1999 *Ivory Hoop*, *Kong, China News Agency*
- 4 *South China Morning Post*, 7 September 1999
- 5 *KWS Wildlife News Desk*, 9 September 1999
- 6 *Mr Fat of the Ngai Group Ivory Factory* pers comm. to EIA, 24 February 2000
- 7 *United Press International*, 30 April 1999
- 8 'Chinese Customs Seize Huge Shipment of Ivory', *AFP*, 3 August 1999
- 9 *China seizes 1.6 tonnes of smuggled ivory*, *Reuters News Service*, 10 November 1998
- 10 *Diplomat* Held, *Reuters*, 31 October 1998
- 11 *M. Lu*, Feb 2000 *Ibid*
- 12 *Faunal Hauler Martin*, 1990, *After the Ivory Horn*, *Wildlife Conservation*, *Nov/Dec* 1990
- 13 *The Hong Kong Ivory Trade*, Milliken & Milliken 1989. In: *The Ivory Trade and the Future of the African Elephant*, Ivory Trade Review Group, Oxford, UK
- 14 *Chi sun Cheung*, *Endangered Species Protection Officer*, *Agriculture and Fisheries Department*, pers comm 17 February 2000

- 15 H. Kiyama, *The Ivory Trade in Japan*, In: *Sill in Business*, TRAFFIC NETWORK 1997
- 16 *The Japanese Trade in Ivory*, Milliken 1989 In: *The Ivory Trade and the Future of the African Elephant*, Ivory Trade Review Group, Oxford, UK
- 17 Menon, V. and Kumar, A. 1998 *Signed and Sealed: The Fate of the Asian Elephant*, WSP, AFRIC and TRAFFIC, 1997
- 18 *A System of Exinction*, EIA, 1998
- 19 *Under Fire*, EIA, 1999
- 20 Teruchi Kanohi pers comm. to EIA, Oct 97
- 21 Menon and Kumar, 1998 and TRAFFIC, 1997 *Ibid*
- 22 TRAFFIC, 1997, *Ibid* p9
- 23 TRAFFIC, 1997, *Ibid* p7
- 24 TRAFFIC 1997, *Ibid* p16
- 25 TRAFFIC, 1997, *Ibid* p13,15
- 26 TRAFFIC, 1997, *Ibid* p9
- 27 Pers comm, *Press Customs & Excise* to EIA, 1 March 2000
- 28 EIA, 1989 *Ibid*
- 29 *Shiga*, then Director of the Environment Agency of Japan, comm. to a governmental meeting held during COP7, cited in *Kiyama 1995 (j)* p260, source *Ivory Tales*, Romi Furuyashiki, 1999
- 30 TRAFFIC, 1997, *Ibid* p18
- 31 *Hanko Industry Journal*, Dec 1998, quoted in *Sakamoto, M. 1998 Analysis of the Amended Management System of Domestic Ivory Trade in Japan*, CITES, CBD Network, JWCS
- 32 *Personal communication from MHT to A. Sato*, Feb 2000
- 33 TRAFFIC, 1997, *Ibid* p15
- 34 *US State Department Cable*, April 1998
- 35 *Reuters*, 31/10/98 *Ibid*
- 36 *Reuters*, 18/11/98 *Ibid*
- 37 *UPI*, 30/4/99 *Ibid*
- 38 Director of KWS pers comm. to EIA, August 1999
- 39 *AFP*, 3/8/99 *Ibid*
- 40 *KWS News Desk*, 9/8/99 *Ibid*
- 41 *KWS Press Release*, 1 March 2000
- 42 *Jorge de Botto in Teixeira*, Director-Geral-Alfama, Portuguese Police/José de Aguiar pers comm. to EIA, 3 November 1999
- 43 *Reuters*, 23/10/99 *Ibid*
- 44 *Paris Customs & Excise* pers comm, March 2000
- 45 *Jorge de Rosario Teixeira*, Director-Geral Adjunto, Portuguese Police Justice Teixeira, pers comm. to EIA, 24 February 2000
- 46 *'Portuguese Seize Smuggled Ivory'*, *Associated Press*, 23 February 2000



© David Stewart/EIA



eia

environmental investigation agency

UK

69-85 Old Street

London EC1V 9HX

tel 44-(0) 20 7490 7040

fax 44-(0) 20 7490 0436

email info@eia-international.org

US

PO box 53343

Washington DC 20009

tel 1-202 452 8661

fax 1-202 452 8663

email EIAgency@email.msn.com

www.eia-international.org