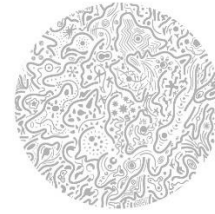




AFRICAN WILDLIFE FOUNDATION®



Animal Welfare Institute  
www.awionline.org



ALIVE  
All Life In a Viable Environment



HUMANE SOCIETY INTERNATIONAL

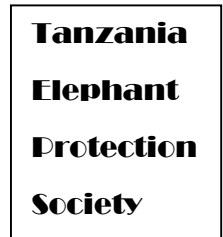


IFAW



Japan Wildlife Conservation Society

野生の世界は野生のままに



WILDAID



April 27, 2015

Prime Minister Shinzo Abe  
Cabinet Secretariat, Government of Japan  
1-6-1 Nagata-cho, Chiyoda-ku  
Tokyo 100 – 8968, Japan

**Re: Statement of Concern to Prime Minister Abe of Japan Regarding Japan’s Ivory Trade and the Decimation of Africa’s Forest and Savanna Elephants**

Dear Your Excellency Prime Minister Abe:

As a signatory to the London Declaration and the Kasane Statement on Illegal Wildlife Trade, we the undersigned organizations are writing to request that Japan take a leadership role in the fight against the illegal trade in ivory. In light of the global elephant poaching crisis, we respectfully ask you to ban the domestic ivory trade in Japan with immediate effect in order to save Africa’s remaining wild elephants. Our concerns are as follows:

**Japan’s ivory control system is failing to prevent illegal ivory laundering**

Since 1970, Japan has imported ivory from more than 250,000<sup>1</sup> African elephants, much of this from tusks that were illegally acquired through the poaching of wild elephants. Japan has also twice been granted permission to buy ivory despite the UN Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) 1989 ban on international commercial trade in African elephant ivory, which was adopted in response to the global elephant poaching crisis of the 1970s-80s.<sup>2</sup> In 1997, Japan secured CITES-approved ivory sales of nearly 50 tonnes of ivory from Zimbabwe, Botswana, and Namibia. In 2008, Japan was allowed to import a further 48 tonnes of ivory.

As a condition of both sales, Japan agreed to implement a domestic ivory control system that would prevent the laundering of illicit ivory. Unfortunately, this system has not worked and has instead served to confuse consumers, increase international demand for ivory, and drive up poaching rates.

Of particular concern is the ivory “registration” program which can be used to grant legal status to illegal tusks or tusks of dubious legality. In the last four years alone, the Government of Japan has “registered” 5,600 tusks weighing more than 50 tonnes,<sup>3</sup> bringing the total registered since 1995 to over 14,000 tusks comprising 185 tonnes of ivory.<sup>45</sup> The “registration” of ivory tusks is a massive loophole that can be used to launder illegal ivory onto the Japanese market.

**Japan’s ivory market is large and thriving**

The Government of Japan presides over the largest known stockpile of ivory tusks and cut pieces—over 340 tonnes.<sup>6</sup> Japan also has more ivory retailers than any country—more than 7,570 according to 2014 figures.<sup>7</sup> Furthermore, Japanese internet retailers Rakuten and Yahoo! Japan are the world’s largest

known internet traders of elephant ivory, each of whom hosts thousands of advertisements offering ivory products for sale;<sup>8</sup> over 90 percent of these are for ivory *hanko* name seals, which are known to be regularly sourced from illegal ivory tusks.<sup>9</sup>

### **Japan's enforcement system is weak and penalties inadequate**

In 2011, Tokyo police presented evidence against Takaichi Inc., Japan's largest ivory manufacturing company and wholesaler of ivory *hanko* name seals, for purchasing 58 illegal unregistered tusks.<sup>10</sup> The tusks were part of a batch of between 500 to 1,600 unregistered illegal tusks that had been purchased by Takaichi between 2005 and 2010.<sup>11</sup> Up to 87 percent of the ivory *hanko* name seals sold between 2005 and 2010 were produced from these illegal ivory tusks.<sup>12</sup> Takaichi Inc. received a fine equivalent to US\$12,500 and none of the three senior officials received a custodial sentence.

### **Africa's forest elephants are particularly at risk from the Japanese ivory market**

More than 100,000 African elephants were poached between 2010 and 2012.<sup>13</sup> The rarer forest elephant species, which occur in only six African countries, have suffered a catastrophic decline. Forest elephants experienced a 65 percent decline between 2002 and 2013.<sup>14</sup> While other countries are likely to be implicated in the decline of forest elephants, Japan is the only country in the world with a demand specifically for forest elephant ivory.<sup>15</sup> Also called "hard ivory," it is used to make *hanko* name seals, *netsuke* figurines, *bachi* plectrums, and chopsticks, among other items. The sale of products using "hard ivory" should be addressed and shut down as a matter of urgency.

### **Japan can best support the global community's efforts to combat elephant poaching by banning its domestic ivory trade.**

In order to protect their elephants, many African nations have banned ivory trade. In response to the current poaching crisis, other initiatives to ban domestic trade are underway, including in the United States at national and state levels, and Europe. We applaud the Government of Japan for its recently announced effort to increase control of the trade of ivory on the internet, but more must be done.<sup>16</sup> We therefore ask that Japan join the global community's effort to end the crisis by:

- Enacting an immediate and permanent ban on the "registration" of ivory tusks to close this massive loophole.
- Banning domestic ivory trade within Japan, giving urgent priority to: ivory *hanko* name seals, hard ivory used for any purpose whatsoever, and internet trade in elephant ivory and all other elephant products.
- Dramatically increasing penalties, including mandatory prison sentences, for selling, possessing, or transporting illegal ivory.

Thank you for doing your part to help prevent the extinction of Africa's forest and savanna elephants.

Sincerely,

Allan Thornton  
President  
**Environmental Investigation Agency**  
PO Box 53343  
Washington, DC 20009  
T: +1 202 483 6621  
E: allanthornton@eia-global.org

**African Wildlife Foundation**, 1400 16th St NW #120, Washington, DC 20036, USA  
**All Life In Viable Environment (ALIVE)**, 5-18-10-102, Honkomagome, Bunkyo-ku, Tokyo, 113-0021  
Japan  
**Animal Welfare Institute**, 900 Pennsylvania Ave SE, Washington, DC 20003, USA  
**Born Free USA**, 2300 Wisconsin Ave., NW, Suite 100B, Washington, DC 20007, USA  
**Born Free Foundation**, Broadlands Business Campus, Langhurst Wood Rd, Horsham RH12 4QP, United Kingdom  
**Conservation Justice**, Libreville, Gabon  
**The David Sheldrick Wildlife Trust**, P.O. Box 15555, Mbagathi, 00503, Nairobi, Kenya  
**The David Shepherd Wildlife Foundation**, Saba House, 7 Kings Road, Shalford, Guildford, Surrey GU4 8JU, United Kingdom  
**Eco Activists for Governance & Law Enforcement**, Central and West Africa  
**Elephant Action League**, USA  
**ElephantVoices**, Norway/USA  
**Humane Society International**, 2100 L St., NW Washington, D.C. 20037, USA  
**International Fund for Animal Welfare**, 1350 Connecticut Ave NW # 1220, Washington, DC 20036, USA  
**Japan Wildlife Conservation Society**, 102 MoutAPT.1-11-19,Sakai Musashino-shi, Tokyo,Japan 180-0022, Japan  
**Last Great Ape Organisation**, Yaoundé, Cameroon  
**Projet d'Appui à l'Application de la Loi Faunique**, 227 rue Campel, Brazzaville, Republic of Congo  
**Pro Wildlife**, Kidlerstr. 2, 80339 Muenchen, Germany  
**Rettet die Elefanten Afrikas e.V.**, Bodelschwinghstr. 30, 50170 Kerpen, Germany  
**Tanzania Elephant Protection Society**, P.O. Box 586, Morogoro, Tanzania  
**Tears of the African Elephant**, Japan  
**WildAid**, 744 Montgomery Street, Suite 300, San Francisco, CA 94111, USA  
**WildlifeDirect**, Via Africa Conservation Fund (Kenya), P.O. Box 24467, Karen 00502, Nairobi, Kenya  
**World Animal Protection**, 450 Seventh Avenue, 31st Floor, New York, NY 10123, USA

---

<sup>1</sup> TRAFFIC (1997). "STILL IN BUSINESS: The Ivory Trade in Asia, Seven Years After the CITES Ban."; Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.jtef.jp/english/graph/2013WhatLiesBeneath.pdf>

<sup>2</sup> The 1989 decision to list all of Africa's elephant populations on Appendix I of the UN Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) banned international commercial trade in African elephant ivory, causing a dramatic decline in elephant poaching across much of Africa and prompting the recovery of many populations that had been decimated by decades of hunting to supply the global ivory trade.

<sup>3</sup> Ministry of Environment (2015), Response on Feb. 6th in 2015 to the e-mail from Japan Tiger and Elephant Fund, Wildlife Division Nature Conservation Bureau Ministry of Environment, Tokyo Japan (in Japanese)

- 
- <sup>4</sup> Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.jtef.jp/english/graph/2013WhatLiesBeneath.pdf>
- <sup>5</sup> Ministry of Environment (2015), Response on Feb. 6th in 2015 to the e-mail from Japan Tiger and Elephant Fund, Wildlife Division Nature Conservation Bureau Ministry of Environment, Tokyo Japan (in Japanese)
- <sup>6</sup> All stocks are privately held. Japan's report on trade control in ivory and ivory markets (2014), available at: <http://www.cites.org/sites/default/files/eng/com/sc/65/E-SC65-42-01-Add.pdf>
- <sup>7</sup> Japan's report on trade control in ivory and ivory markets (2014), available at: <http://www.cites.org/sites/default/files/eng/com/sc/65/E-SC65-42-01-Add.pdf>
- <sup>8</sup> Environmental Investigation Agency (2014). *Blood e-Commerce: Rakuten's profits from the slaughter of elephants and whales*, available at <http://eia-global.org/news-media/blood-ecommerce-rakutens-profits-from-the-slaughter-of-elephants-and-whales>
- <sup>9</sup> Environmental Investigation Agency (2014). *Blood e-Commerce: Rakuten's profits from the slaughter of elephants and whales*, available at <http://eia-global.org/news-media/blood-ecommerce-rakutens-profits-from-the-slaughter-of-elephants-and-whales>
- <sup>10</sup> Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.jtef.jp/english/graph/2013WhatLiesBeneath.pdf>
- <sup>11</sup> Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.jtef.jp/english/graph/2013WhatLiesBeneath.pdf>
- <sup>12</sup> Sakamoto, Masayuki (2013), "What Lies Beneath: Exposing the Loopholes Within Japan's Control of Internal Ivory Trade," Japan Tiger and Elephant Fund, available at: <http://www.jtef.jp/english/graph/2013WhatLiesBeneath.pdf>
- <sup>13</sup> Wittenmyer, G., Northrup, J.M., Douglas-Hamilton, I., et al. (2014) *Illegal Killing for ivory drives global decline in African elephants*. Proceedings of National Academy of Science.
- <sup>14</sup> Maisels F, Strindberg S, Blake S, Wittenmyer G, Hart J, et al. (2013) *Devastating Decline of Forest Elephants in Central Africa*. PLoS ONE 8(3): e59469. doi:10.1371/journal.pone.0059469. Updated data: "New Data Shows Continued Decline of African Forest Elephants" (2013) Wildlife Conservation Society press release, available at: <http://www.wcs.org/press/press-releases/new-data-on-forest-elephants.aspx>. See also: <http://www.eci.ox.ac.uk/news/events/2014/megafauna/maisels.pdf>
- <sup>15</sup> Nishihara, T. (2012) *Demand for forest elephant ivory in Japan*. Pachyderm No. 52, available at <http://www.pachydermjournal.org/index.php/pachy/article/viewFile/267/201>
- <sup>16</sup> Mainichi (April 16, 2015). *Government to reinforce regulations on online domestic ivory trading*, available at <http://mainichi.jp/english/english/newsselect/news/20150405p2a00m0na006000c.html>