



Mr. Keiichiro ASAO
Minister
Ministry of the Environment
Government of Japan
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Tokyo 100-8975
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Mr. Yoji MUTO
Minister
Ministry of Economy, Trade, and Industry
Government of Japan
1-3-1 Kasumigaseki, Chiyoda-ku
Tokyo 100-8901
Japan

May 16, 2025

Re: Appeal for Amendments to the LCES to Close Japan's Elephant Ivory Market

Dear Minister Asao and Minister Muto:

On behalf of our environmental organizations, supported by millions around the world, we are writing to respectfully urge Japan to close its market for the commercial trade in elephant ivory.

The Ministry of Environment's (MoE) ongoing statutory review of the Law/Act for the Conservation of Endangered Species of Wild Fauna and Flora (LCES/ACES) is the perfect opportunity to amend regulations to close Japan's market for elephant ivory to reduce the demand for ivory and contribute to increased protections for elephants. We urge you to shepherd the MoE's review of the LCES to ensure the inclusion of regulatory changes that will close Japan's domestic commercial market for elephant ivory.

Africa's elephant populations have declined dramatically over the past 50 years,¹ and today continue to face the threat of being killed to feed the demand for ivory. Elephant poaching and ivory trafficking have declined in recent years, largely due to the closure of domestic ivory markets globally and associated demand reduction and strengthened enforcement efforts, but the threat of poaching to supply the ivory trade persists, particularly for smaller populations of Critically Endangered forest elephants in West and Central Africa.

In 2016, Japan agreed to a resolution under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) that recommends all countries with legal ivory markets that contribute to poaching or illegal trade close them for commercial trade urgently.² The same resolution notes that many elephant range states have called on countries to close their domestic markets for ivory. Some African elephant range states have also criticized Japan for refusing to close its market since the adoption of the revised resolution in 2016,³ and Japan's market will be under scrutiny at this year's CITES Conference of the Parties (CoP20).

It is impossible to reduce the demand for ivory while a legal trade in ivory persists, and reducing global demand for ivory is critical to ending the illegal trade and protecting elephants. Japan's ongoing support for the ivory industry only serves to perpetuate the demand for ivory and provide opportunities for ivory trafficking.

Japan's ivory market controls are riddled with loopholes that can be easily exploited to facilitate the trade in illegal ivory.⁴ The domestic ivory market also contributes directly to the illegal international trade in ivory, as evidenced by official CITES ivory seizure data.⁵ Its very existence undermines efforts by other countries, including African elephant range states, to reduce demand for ivory and enforce ivory market closures to protect elephants. Closing the market in Japan would significantly curtail the risk that items illegally exported from Japan to other countries will fuel the demand for illegal ivory in other jurisdictions.

Right now, Japan has the opportunity to take meaningful action that will make a lasting impact for the long-term protection of elephants. Under your leadership, we urge the Government of Japan to make regulatory changes to the LCES that would effectively close Japan's market for ivory.

Sincerely,

Environmental Investigation Agency
Animal Legal Defense Fund
Association of Zoos & Aquariums
Born Free USA
CITES Japan Youth
EAGLE Network
Fondation Franz Weber
Humane World for Animals
Japan Wildlife Conservation Society
Peace for Conservation
Save the Elephants
Tears of the African Elephant
WildChoices
WildlifeDirect

Japan Tiger and Elephant Fund
Animal Welfare Institute
Born Free Foundation
Center for Biological Diversity
David Shepherd Wildlife Foundation
Elephant Reintegration Trust
Future for Elephants e.V.
International Fund for Animal Welfare
Natural Resources Defense Council
Pro Wildlife
Species Survival Network
WildAid
Wildlife Conservation Society

Cc: Mr. Takeshi IWAYA, Minister of Foreign Affairs
Ms. Yuriko KOIKE, Governor of Tokyo
Mr. Joseph Young, Chargé d'Affaires ad interim, U.S. Embassy Tokyo
Ms. Julia Longbottom, United Kingdom Ambassador to Japan
Mr. Jean-Eric Paquet, Ambassador of the European Union to Japan

¹ Wittemyer, George. March 2, 2025. The Conversation. Africa's elephants have been in dramatic decline for 50 years. What can be done to save them – new study. <https://theconversation.com/africas-elephants-have-been-in-dramatic-decline-for-50-years-what-can-be-done-to-save-them-new-study-250293>

² <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf>

³ CoP19 Doc. 66.3 on Implementing Aspects of Resolution Conf. 10.10 (Rev. Cop18) on the Closure of Domestic Ivory Markets <https://cites.org/sites/default/files/documents/E-CoP19-66-03.pdf>

⁴ https://eia.org/wp-content/uploads/2023/10/SC77-EIA_JTEF-Japan-Briefing- FINAL_31-Oct-2023.pdf

⁵ <https://etisonline.org/data-aggregates>