



March 20, 2018

Mr. Manabu Miyasaka  
CEO and President, Yahoo! Japan Corporation  
Yahoo Japan Corporation  
Kioi Tower, Tokyo Garden, Terrace Kioicho  
1-3 Kioicho, Chiyoda-ku, Tokyo  
102-8282, Japan

**Re: Appeal to Immediately Cease Yahoo! Japan’s Elephant Ivory Advertisements and Sales**

Dear Mr. Miyasaka:

I am writing on behalf of the Environmental Investigation Agency (EIA) and the 43 undersigned environmental and conservation organizations to respectfully request that Yahoo! Japan enact a complete ban on the sale of elephant ivory products on its shopping and auction sites.

We believe that Yahoo! Japan shares our strong concerns regarding Africa’s rapidly disappearing elephant populations, and we acknowledge and thank Yahoo! Japan for your recent initiatives to prevent trade in illegal ivory. Unfortunately, despite these and other private sector efforts to prevent trade in illicit ivory, the fundamental regulatory failures within the Government of Japan’s (GoJ) ivory control system make it impossible for the private sector to detect or prevent such illegal ivory from being sold on their platforms or in their shops.

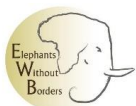
The GoJ has failed to implement ivory trade controls on the “upstream” ivory trade in Japan as required by the Convention on International Trade in Endangered Species of Wild Fauna and Flora’s (CITES) ivory trade controls. In particular, the GoJ’s failure to require genuine proof of the legal origin and acquisition of tusks as a condition of their registration, failure to mark registered tusks, and inability to physically inspect tusks means that the current system cannot identify or prevent illegal tusks from entering the domestic market.

We remain concerned about the failure to amend Japan’s Law for the Conservation of Endangered Species of Wild Fauna and Flora (LCES) to require mandatory strict evidentiary documentation in upstream trade. The longstanding fundamental problems with Japan’s domestic ivory control scheme persist today and the recent amendments to the LCES fail to remedy any of these serious flaws. The amendments focus on minor measures in the downstream trade while continuing to ignore major flaws in the upstream trade that begin with registration of ivory tusks without proof of legality of origin or acquisition.

Recent evidence illustrates the ease at which illegal ivory can be laundered onto Japan’s legal market, and therefore Yahoo! Japan shopping sites, via loose regulatory controls.<sup>1</sup> For example, undercover investigations demonstrated that Japan Wildlife Research Centre (JWRC) staff were willing to coach ivory registration applicants in how to falsify registration documents for whole tusks.<sup>2</sup> In 2017, the Tokyo Police charged the president of antique company Raftel and 27 customers with violating the LCES for illegal trade in unregistered ivory. According to reports, Raftel’s president claimed JWRC staff had previously provided instructions for registering illegal tusks with apparent knowledge that Raftel was using fraudulent documents. Raftel registered 400-500 tusks over the past four to five years.

<sup>1</sup> *Japan’s Illegal Ivory Trade and Fraudulent Registration of Ivory Tusks*: <https://eia-global.org/reports/japan-s-illegal-ivory-trade-and-fraudulent-registration-of-ivory-tusks>; *The Dirty Secrets of Japan’s Illegal Ivory Trade*: <https://eia-global.org/reports/dirty-secrets-of-japans-illegal-ivory-trade-report>; and, *The Last Ivory Ban Haven: The Drivers of Japan’s Illegal Ivory Trade and the Failure of Japan’s Domestic Ivory Legislation*: [http://www.jtef.jp/document/THE\\_LAST\\_IVORY\\_BAN\\_HAVEN\(E\).pdf](http://www.jtef.jp/document/THE_LAST_IVORY_BAN_HAVEN(E).pdf).

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The lack of effective domestic controls enables large amounts of undocumented tusks to be sold illegally. These illegal tusks are often processed into blank ivory *hanko* name seals that can then easily be sold online. For example, in 2011 the Tokyo District Court convicted Kageo Takaichi, President of Takaichi Inc. and former chairman of the Japan Federation of Ivory Arts and Crafts Associations, for purchasing 58 unregistered, illegal tusks. It is estimated that between 2005 and 2010 Takaichi Inc. used between 572 and 1,622 unregistered illegal ivory tusks to manufacture *hanko* name seals, accounting for between 31 and 87 percent of all *hanko* name seals produced in Japan during that period.

At the 17th CITES Conference of the Parties in 2016, Parties adopted a resolution calling for the closure of all ivory markets contributing to poaching or illegal trade. It is now widely recognized that all ivory markets contribute to the illegal ivory trade. The vast majority of African elephant range states support banning ivory trade. The United States banned ivory trade in 2016 and China's ivory ban came in to force on January 1, 2018. Japan is the second largest consumer of elephant ivory behind only China.

Chinese authorities have seized 5.8 metric tons of ivory smuggled from Japan since 2009<sup>3</sup> and the Ministry of Environment has acknowledged that 100 shipments of ivory from Japan were seized by Chinese authorities between 2011 and 2016. One Chinese syndicate admitted to smuggling 3.2 metric tons of ivory purchased on Yahoo! Japan to China between 2010 and 2012.


A recent report published by TRAFFIC Japan found “considerable evidence” that Japan is contributing to the illegal ivory trade. TRAFFIC strongly recommended a ban on all online ivory trade in Japan and has also called for Japan to close its domestic ivory market. In 2017, leading Japanese companies including Rakuten, Aeon and Mercari enacted policies to protect elephants and eliminate the risk of facilitating the illegal trade in ivory by ending, or committing to end, ivory sales.

Despite admirable attempts by Yahoo! Japan to strengthen controls and increase monitoring of ivory items, the GoJ controls, as set out in the LCES, cannot prevent illegal ivory from entering the market and thus Yahoo! Japan cannot avoid selling illegal ivory under the existing system. Only a cessation of ivory trade will prevent the sale of illegal ivory within Japan.

We again thank you for Yahoo! Japan's commitment to prevent trade in illegal ivory.

We would be grateful to arrange a telephone conversation with your representative to discuss this issue further. May we kindly ask for your representative to contact us to acknowledge receipt of this letter via email and arrange a mutually convenient time to talk? Please contact Amy Zets Croke at the Environmental Investigation Agency, at [amyzets@eia-global.org](mailto:amyzets@eia-global.org) or via telephone +1 202-483-6621.

Yours sincerely,

  
 Allan Thornton, OBE  
 President  
 Environmental Investigation Agency

**On behalf of:**  
 Kaddu K. Sebunya, President, **African Wildlife Foundation**  
 Jill Robinson MBE, Dr med vet hc, Hon LLD, Founder & CEO, **Animals Asia Foundation**  
 Nadia Adawi, Executive Director/General Counsel, **Animal Welfare Institute**

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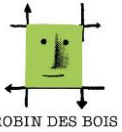
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CC: Kentaro Kawabe, Senior Executive Vice President Corporate Officer & COO

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Naoya Bessho, Corporate Officer, Executive Vice President & General Counsel

Toshiaki Chiku, Regional Managing Director, North America, Partnership

Shuichi Nishida, Corporate Officer, Executive Vice President & President of Social Responsibility Promotion Group



W P S I





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Mr. Masayoshi Son  
Director, Yahoo Japan Corporation  
Founder, Chairman of the Board & CEO, SoftBank Group Corp.  
Chairman of the Board, Sprint Corporation  
SoftBank Group Corp.  
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