



A CITES priority:

Domestic Ivory Markets: Where they are and how they work

A TRAFFIC briefing document
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Ivory markets in Africa and Asia continue to drive an increasing trend in illegal trade in elephant ivory, with thousands of elephants killed every year to feed them.

This briefing paper examines some common issues that conspire to drive illegal trade in ivory at the domestic level and presents a 'score-card' assessment of African and Asian Elephant range states and the major consuming markets around the world.



Auditing ivory stockpile, Burundi, March 2004.

The most recent Elephant Trade Information System (ETIS) analysis of over 9 400 elephant product seizure records statistically demonstrates that illicit trade in ivory is most directly correlated to the presence of large-scale, poorly regulated domestic ivory markets around the world. If an elephant is poached for its ivory, chances are great that that ivory will end up in a market in either Africa or Asia. From there, the trade is likely to spill over into other end-use markets in Europe, North America or possibly the Middle East. These markets are today the principal drivers of illegal killing of thousands of elephants annually. A recent assessment of 22 ivory carving markets in Africa and Asia conservatively estimated that the ivory of between 4800 and 12 200 elephants are needed each year to support annual production needs, with the pattern of killing appearing to be concentrated on elephant populations in central Africa.

CITES has made various attempts in the past to address the issue of domestic ivory markets. In 1987, CITES Parties agreed that all raw ivory importers and exporters, and all enterprises that cut or carve ivory should be registered or licensed, with proposals for recording and inspection procedures to monitor domestic ivory trade flows. From this beginning, CITES has continued to expand its role to ensure that ivory trade at the national level does not give rise to international trade dynamics that undermine elephant conservation elsewhere. In 1997, Parties adopted Resolution Conf. 10.10 Trade in Elephant Specimens with a provision for control of internal ivory trade that called for the adoption of comprehensive internal legislative, regulatory and enforcement measures.

However, despite the best efforts of CITES, many domestic ivory markets remain largely unfettered. The worst are completely unregulated, while others have regulations and controls, but they are poorly enforced or afford legal or administrative loopholes that provide cover for illicit trade to continue.

Following the ETIS analysis at CoP12, the CITES Parties adopted Decision 12.39, which established a process to assess compliance with the provisions for internal trade in ivory in Cameroon, China, the Democratic Republic of the Congo, Djibouti, Ethiopia, Japan, Nigeria, Thailand, Uganda and the United States. To date, little has been achieved in some of these countries, but the process is ongoing and the issue will be formally addressed at CoP13. It may also be necessary to broaden the CITES oversight process to address domestic ivory trade in other countries not included in Decision 12.39. In particular, efforts under CITES need to be flexible and be able to respond to new trends and markets that could be emerging. The most recent ETIS analysis for CoP13, for example, highlights a number of countries which did not feature in the cluster analysis in the ETIS report to CoP12, including Angola, Malawi, Mozambique and Sudan.

The following 'score card' assesses all African and Asian Elephant range states and some of the major consuming markets around the world. The situation is dynamic and some countries or territories may have improved their controls since this assessment was made. If that is the case, TRAFFIC welcomes updated information to improve this assessment in the future. What is evident, however, is that much still needs to be done to ensure that the world's domestic ivory markets are regulated to the standard agreed by the CITES Parties.

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Country Territory	Scale of domestic ivory market:	Scale of ivory carving industry:	Registration of all importers, exporters, dealers, and carvers?	Effective trade controls for raw ivory?	Effective tracking of retail ivory markets?	Effective law enforcement of domestic ivory markets?	Comments
Africa							
Angola	Small, but believed	Unknown	No	No	No	No	Needs attention; could be emerging to be a growing entrepot for central African ivory.
Benin	Very small	Unknown	No	Unknown	Unknown	Unknown	Local market believed to be small, but proximity to Nigeria could stimulate some trade.
Botswana	Very small	None	Yes	Yes	Unknown	Yes	No local market in the recent past and little reason to suspect any change in status
Burkina Faso	Very small	None	Unknown	Yes	No	Yes	Very small market when last surveyed in mid-1990s and probably little changes.
Burundi	Very small	None	Unknown	Unknown	Unknown	Unknown	A major entrepot in the past, and still could be linked to some DRC ivory movements; ongoing civil conflict means no domestic ivory market.
Cameroon	Large, but needs to be assessed	Medium	No	No	No	No	Major sub-regional entrepot, transit be assessed country and exporter; airline companies complicit in illegal trade.
Central African Republic	Medium, but declining	Small	No	No	No	No	Local market depressed in face of ongoing civil unrest, but still a major regional supplier of ivory.
Chad	Small	None	No	Yes	No	No	In the past very small, but local poaching and a transit route to Nigeria and Sudan
Congo	Medium, but needs to be assessed	Very small, needs to be assessed	No	No	No	No	Needs attention; Brazzaville could be re-emerging as important ivory centre in central Africa.
Cote d'Ivoire	Large, but declining political unrest	Large	Partial	No	No	No	One of the key ivory markets in west Africa; could re-emerge once political stability is at hand.
Democratic Republic of the Congo	Large and believed to be growing	Large	No	No	No	No	Civil unrest inhibits effective enforcement in many parts of the country, but Kinshasa, far from the conflict areas, is also unregulated. Overall, probably the largest supplier of ivory today.
Djibouti	Small and probably declining	None	No	No	No	No	Since CoP12, the market seems to be waning, but still could be transit route linked to Ethiopia.
Egypt to be assessed	Very large, but needs to be assessed	Large	Unknown	Yes	No	No	Far from elephant range, one of the largest ivory markets in Africa, but has not been assessed for many years.
Equatorial Guinea	Unknown	Unknown	No	No	No	No	Unknown, but some concern that oil wealth could spur ivory trade too.
Eritrea	Unknown	Unknown	Unknown	Unknown	Unknown	Unknown	Not surveyed in recent years, but believed to be small.
Ethiopia	Large	Small, needs to be assessed	No	No	No	No	The largest unregulated market in east Africa, also important entrepot and airline route for ivory leaving Africa.
Gabon	Small	Very small	No	Yes	No	Partial	Affluence could spur ivory trade, but suppression in the past keeps the scale small.
Ghana reports of ivory	Small	Very small	No	No	No	No	Ivory products are openly displayed in Acera's crafts market, but never any seizures from government.
Guinea	Unknown	Very small	No	Yes	No	Partial	Guinean ivory carvers reputedly the best in west Africa but most work outside of home country it seems.
Kenya	None	None	Yes	Yes	Yes	Yes	With well-connected air and seaports, remains an active trade route, but successfully suppresses all local trade.
Liberia	Very small	Unknown	No	Yes	Yes	Unknown	Emerging from a civil war, little recent evidence of trade in ivory.
Malawi	Small, needs to be assessed	Very small, needs to be assessed	Yes	Yes	No	No	Local market and carving industry needs careful re-assessment in view of evidence of syndicate trading and Malawi's role as source of the largest ivory seizure since 1990.
Mali	Small	Unknown	Unknown	Yes	Unknown	Unknown	Not known as a major ivory market, but a large seizure of worked ivory in China from Mali could signal a change.
Mozambique	Large, needs to be assessed	Large	No	No	No	No	The largest unregulated market in southern Africa; export trade suspected from northern seaport cities and airport in Maputo offers ivory in duty-free shops.
Namibia	Very small	Very small	Yes	Yes	Partial	Yes	Little trade now, but hopes to gain approval at CoP13 for a highly-controlled legal avenue of trade in a traditional ivory product.
Niger	Very small	Unknown	Unknown	Yes	Unknown	Unknown	No evidence to suggest a country of a concern.
Nigeria	Very large, appears to be growing	Medium, but needs to be assessed	No	No	No	No	Largest and apparently growing unregulated market in west Africa; also major entrepot and export route out of Africa.
Rwanda	Small	Unknown	No	No	Unknown	Unknown	Could be a transit country for raw ivory from DRC.
Senegal	Medium	Medium	No	No	No	No	Senegalese traders form the backbone of west Africa's ivory trade; linked to Cote d'Ivoire and to supply routes throughout the Continent.
Sierra Leone	Very small	Unknown	No	No	No	No	Emerging from civil conflict, believed to be a very small player.
Somalia	Unknown	Unknown	No	No	No	No	A past offender in a major way, but current status of the trade is totally unknown.

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South Africa	Large	Very small	Yes	Yes	Partial	Yes	Legal trade in worked ivory from Kruger National Park stocks, but flea markets sometimes feature ivory items from other parts of Africa.
Sudan	Medium, but possibly growing	Small	No	No	No	No	Identified as major entrepot and trade route to China and into Egypt.
Swaziland	Very small	None	Yes	Yes	Yes	Yes	Active suppression of local market.
Tanzania	None	None	Yes	Yes	Yes	Yes	Dar es Salaam continues to function as a trade route and role of Zanzibar needs attention; local trade is actively suppressed.
Togo	Small	Unknown	No	Unknown	Unknown	Unknown	Small market in past, but not assessed in recent years.
Uganda	Very small	None	Yes	Yes	Partial	Partial	No local market, but military links to the movement of DRC ivory into international markets remains a serious allegation.
Zambia	Very small	None	Yes	Yes	No	Partial	Local market is actively suppressed, but Zambian ivory has moved into Malawi for export abroad in recent years.
Zimbabwe	Very large	Medium	Yes	Yes	Partial	Partial	Legal trade allowed under CITES, but a robust evaluation of the local control system is warranted.
Asia							
Cambodia	Small	Medium	No	Yes	No	No	Small trade but still produces negative impacts on local elephant populations.
China	Very large	Large	Yes, needs verification	Yes	Partial	Partial	Policing of large stocks of raw and worked ivory an ongoing problem; law enforcement improving, but Chinese citizens in Africa complicit in trade.
Hong Kong, SAR	Very large	Very small	Yes	Yes	No	No	Possibly the largest worked ivory stock in the world, but probably needs better monitoring.
India	Very small	Large	Yes	Yes	Yes	Yes	Has imposed a national trade ban and actively suppresses local market, but some carvers still do 'special orders' and engage in underground illegal trade.
Indonesia	Medium, possibly increasing	Very small	No	Yes	No	No	Very small volumes of ivory here and there, but the sum of these parts could be worrying.
Japan	Large	Large	Yes	Yes	No	Yes	Retail-level controls and monitoring need to be improved, but moves to close legal loopholes currently in progress.
Lao PDR	Medium	Very small	No	No	No	No	A backwater trader with a small local market, but still impacts local elephant populations.
Macau, SAR	Small	None	No	Yes	No	No	The local market is waning by most accounts.
Malaysia	Very small	None	No	Yes	No	Yes	Not a traditional craft, but affluence might inspire new trade.
Myanmar	Large	Medium	No	No	No	No	Overlooked in most assessments, but needs attention to stop unsustainable exploitation of local Asian Elephant populations.
Nepal	Medium	Very small	No	Yes	No	No	A declining industry, but family carvers still 'hang on'.
Philippines	Small	None	Unknown	Yes	No	No	Has functioned as a transit country in the past.
South Korea	Very small	None	No	Yes	No	Yes	Almost no trade within the country, but Korean nationals implicated in international ivory dealings.
Singapore	Medium	None	Yes	Unknown	No	No	Important trade route between Africa and key Asian end-use markets, but few seizures ever reported.
Sri Lanka	Small	Small	No	Yes	No	No	Local trade declining and actively suppressed.
Taiwan	Medium	Very small	Yes	Yes	No	No	Local market seems to be declining, but could be a transit route to Chinese mainland or Japan.
Thailand	Very large	Large	No	No	No	No	Legal loophole allows ivory from domesticated elephants, but is exploited to mask huge unregulated trade in ivory from Africa.
Viet Nam	Medium	Small	No	Yes	No	No	Could be declining but needs to be watched.
Europe / USA							
Belgium	Small	None	No	Yes	No	Yes	Some trade in pre-ban stocks.
France	Medium	None	No	Yes	No	Yes	'Old' ivory on the Paris market could hide recent additions.
Germany	Small	Small	Partial	Yes	Partial	Yes	Carving industry relies on pre-ban ivory stocks in Germany prior to 1989.
Switzerland	Small	None	Yes	Yes	No	Yes	A small market for worked ivory.
United Kingdom	Medium	None	No	Yes	No	Yes	Ivory 'antiques' may not be what they purport to be.
United States	Large	Very small	No	Yes	No	Yes	Pre-ban worked ivory stocks in some markets are not properly monitored and could mask ongoing illegal trade; Internet trading cause for concern.

Key issues

Raw ivory stocks: Stocks of raw ivory are found in most elephant range States, and any number of transit countries, manufacturing location and end-use markets. Aside from government-held stocks, large volumes of raw ivory were legally in the hands of private importers, manufacturers or large State-owned enterprises at the time the CITES trade ban took effect in January 1990. The challenge for elephant range States is to develop credible ivory stock management systems that clearly mark each individual tusk or piece of ivory, and track its source so that legal stocks can be differentiated from stocks coming from illegal sources. Stocks in the hands of the private sector need to be marked and registered with each owner, and an ongoing process of monitoring and reporting established.

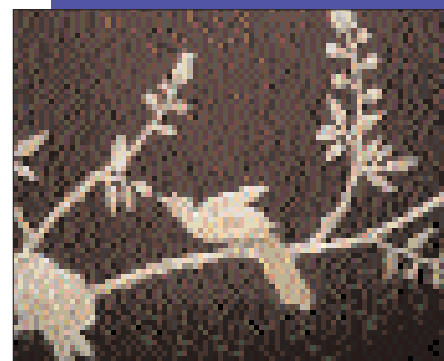
Worked ivory products at the retail level: Large volumes of worked ivory products were in commerce at the time the CITES trade ban on ivory was imposed. In most countries, these stocks were considered to be on the market legally and continued to be sold without restriction. However, with no credible means to distinguish 'old' pre-Convention or pre-ban stock from 'new' stock, there are probably more ivory products available today in some markets than was the case several years ago. While many of these markets are in Africa and Asia, the situation is also of some concern in the USA and the European Union. Regulatory measures should be reviewed.

Local or foreign buyers: The basic idea behind a legal domestic ivory market supplied by pre-ban stocks or legal new ivory from within the same country, is the implication that the buyers are local and the ivory remains within the country. In fact, this is often not the case and expatriates, diplomatic staff, military personnel or foreign tourists may indeed be the major consumers. These individuals eventually bring the ivory products they purchase back to their home countries, often in complete violation of CITES and national wildlife trade controls. Few countries have moved to implement appropriate public awareness initiatives as mandated by Resolution Conf. 10.10.

Legal exceptions and loopholes: Allowing retail trade, even on a conditional basis, will inevitably attract illegal supply if the proper tools for effective control are not in place. For example, Thailand's *Transport Animal Act* provides for ivory from domesticated Asian Elephants. However, distinguishing Asian Elephant ivory from that of African Elephants or ivory from wild versus domesticated animals to be traded is not possible without sophisticated forensic examination, and in some instances may not be possible at all. This loophole is being exploited by retail ivory dealers, hindering effective law enforcement and giving rise to a situation where tens of thousands of ivory products of doubtful origin are continuously on display for sale throughout the country.

Antiques and Internet trading: CITES provides an exception for ivory products that pre-date 1976, the year the African Elephant was first listed in the CITES appendices. However, there is concern that a multitude of ivory products in antique markets in the United Kingdom, the United States and elsewhere may not be genuine antiques. There are various techniques employed to make new ivory look 'old', and even experts can find it difficult to tell the difference. There is emerging evidence that also implicates the illegal marketing of ivory through Internet auctions.

Lack of inter-agency co-operation: The purview of the wildlife and CITES authorities is often very limited in some countries. Ivory curio dealers in Addis Ababa and Kinshasha, for example, are able to obtain licenses to sell ivory in their shops from municipal authorities, without any reference to the country's obligations under CITES or those in charge of wildlife issues in the country. In Nigeria, Cote d'Ivoire and Senegal, wildlife authorities are systematically barred from exercising wildlife trade controls at the ports of entry and exit, giving rise to routine illegal trade in ivory and ivory products.



Ivory art on display.

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