

AN UPDATED REVIEW OF ONLINE IVORY TRADE IN JAPAN

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KEY POINTS:

- In 2017, TRAFFIC conducted a survey to update the state of online ivory trade in Japan, last reviewed in 2014. In addition to online shopping malls and auction sites, emerging online CtoC (Customer to Customer) market sites were surveyed.
- Legal ivory sales continue on online shopping malls and auction sites, though there is evidence of improved compliance with Japan's domestic law¹ owing to e-commerce companies' monitoring activities. Overall trends in online ivory trading are not possible to gauge at this point, but collectively various channels are active.
- Emerging online CtoC markets are being used for trading personal ivory items, particularly jewellery. An average of 143 new advertisements² were uploaded every week on Mercari, Japan's leading online CtoC market. Advertisements of "new" ivory jewellery brought back from Asia and Africa in contravention of CITES were also found.
- 2,447 ivory items² on average were auctioned every week on Yahoo Auction. The trade value of ivory over a four-week monitoring period was estimated at JPY45.2 million (USD407,000). The majority of sellers who did not identify themselves as businesses could be inferred to be operating as such.
- Japan's current legal framework does not regulate ivory trade amongst individuals except when whole tusks are traded. There is no way of establishing legality in the active online trading of other ivory items such as jewellery and figurines.
- TRAFFIC recommends the government urgently assesses the feasibility of installing strict measures to address all aspects of internal ivory trade, including capturing the identity of, and registering online businesses with no indication of their identity as such, as well as encouraging the e-commerce sector to implement stricter measures, including banning the trade, and awareness raising for e-commerce users.



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BACKGROUND

Japan is home to a long-standing domestic ivory market with a still significant carving industry and is listed as a country of “importance to watch” under the Elephant Trade Information System (ETIS) review process³ of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Japan has twice been allowed to be a legal importer of ivory in the context of the two CITES-approved one-off ivory sales. Aside from the estimated USD19 million annual production by the carving industry⁴, a majority of which is based on *hanko* or name seal sales, there exists a substantial and largely unregulated domestic market in old ivory products which are traded amongst dealers and individuals. The wide availability of old ivory products is a legacy of Japan's former ivory trade boom sustained until the international trade ban of elephant ivory was introduced under CITES in 1989.

In June 2017, the Japanese government strengthened certain aspects of internal ivory trade regulations for businesses under the Law for the Conservation of the Endangered Species of Wild Fauna and Flora (LCES). Amendments include updating the business notification system to a registration system with increased penalties for non-compliance and mandating ivory businesses to register all whole tusks in their possession. While such measures build on the existing controls over businesses, the LCES regulations leave all other domestic ivory trade with only limited and, in some cases, completely without regulatory control. The proof of legality at the product level

1 The Law for the Conservation of Endangered Species of Wild Fauna and Flora (LCES), reformed in June 2017 for enactment in 2018, will strengthen ivory business regulations.

2 Excluding whole tusks and semi-processed ivory. Multiple items offered in a single lot were counted separately as individual pieces.

3 Milliken, T. Underwood, F.M., Burn R.W., and Sangalakula, L. (2016). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 17th meeting of the Conference of the Parties*. CoP17. Doc. 57.6 (Rev.1). Annex.

4 Kitade, T. and Toko, A (2016). *Setting Suns: The Historical Decline of Ivory and Rhino Horn Markets in Japan*. TRAFFIC, Tokyo, Japan

is delegated to a voluntary certification scheme for new products, and regulation over trade in any ivory items other than whole tusks⁵ is non-existent. These grey areas in Japan's domestic ivory trade must be addressed accordingly to eliminate potential loopholes for illegal ivory flows.

Globally, wildlife cybercrime is increasingly recognized as a serious challenge which undermines the efforts to prevent illegal wildlife trade^{6,7}. While online ivory sales remain legal in Japan, the sheer scale of the trade warrants scrutiny to prevent illicit activities. TRAFFIC's review in 2014 elucidated certain enforcement weak spots, which led major e-commerce companies to enforce relevant rules for their users through monitoring activities. While some other unaddressed issues continue to raise concerns, new issues have also arisen which likely affect the current pattern of online ivory trade, including the growth of the CtoC (Customer to Customer) sector and increased use of smartphone apps. This study reassessed the pattern of online ivory trade in Japan and highlighted areas where the lack of regulatory provisions still presents serious challenges.

SURVEY METHODOLOGY

Snapshot analysis

The methodology used by TRAFFIC⁸ in the 2014 study of online ivory trade on major Japanese e-commerce platforms was again employed but extended to include several other major platforms in order to capture new trends in e-commerce. The types of online platforms were categorized into: 1) shopping mall; 2) auction; 3) CtoC market, with the latter being a new and growing form of online trading.

- 1) Shopping malls: Rakuten-Ichiba (<http://www.rakuten.co.jp/>), Yahoo Shopping (<http://shopping.yahoo.co.jp/>)
- 2) Auction: Yahoo Auction (<https://auctions.yahoo.co.jp/>)
- 3) CtoC markets: Mercari (<https://www.mercari.com/jp/>), Rakuma (<https://rakuma.rakuten.co.jp/>)

In May 2017, TRAFFIC collected sample webpages using a keyword “hon-zouge 本象牙 (genuine ivory)” and analysed information on products offered, the status of compliance with the LCES, and the nature of sellers/businesses. From the search results, every shop was sampled for shopping malls, while the top 100 advertisements were sampled for auction and CtoC market sites. Furthermore, whole ivory tusks were searched specifically on Yahoo Auction and Mercari sites to check compliance with the LCES. The snapshot survey was intended as a quick characterization and not as a comprehensive or representative sampling of total ivory sales. These aspects were supplemented by the monitoring survey. (It should be noted that Rakuten, Inc. later introduced a ban of ivory sales on Rakuten-Ichiba on 1st July 2017).

Monitoring survey

Ivory trade was monitored on Yahoo Auction and Mercari for four weeks (8th May to 4th June 2017) to record the types and number of products. For Yahoo Auction, records of successful bidding during this period were retrieved using a keyword “zouge 象牙 (ivory)” (Yahoo Auction's search engine allows viewing records over the previous 120 days). For the CtoC market site, Mercari, new advertisement alerts containing “zouge (ivory)” as a keyword were checked every day using a smartphone app⁹. Advertisements were checked visually to ascertain the authenticity of the ivory, but descriptions by sellers were adopted when it was not clear from the photos. Individual items were counted separately when offered in the same lot unless multiple parts comprised one functional unit (e.g. a pair of chopsticks, a pair of earrings, or a set of bridges for the *koto*, a traditional Japanese musical instrument). On Yahoo Auction, the total value of ivory trade was compiled using final bidding price records of ivory items comprising almost exclusively of ivory (90% by appearance, excluding wrappings, containers or pedestals). The results of sales and final price were not tracked on Mercari due to the lack of search functions for this purpose. The currency rate of JPY1 = USD0.00900 (at 2nd June 2017) was used.

5 Includes carved/uncarved, polished/unpolished tusks retaining the curvature of a tusk

6 CITES Decisions 17.92-17.96

7 Xiao, Y., Jing, G., and Xu, L. (2017). *Wildlife Cybercrime in China: E-commerce and social media monitoring in 2016*. TRAFFIC, Briefing Paper

8 Matsumoto, T. (2015). *A Review of Online Ivory Trade in Japan*. TRAFFIC, Tokyo, Japan.

9 <http://furimaalert.webcrow.jp/>

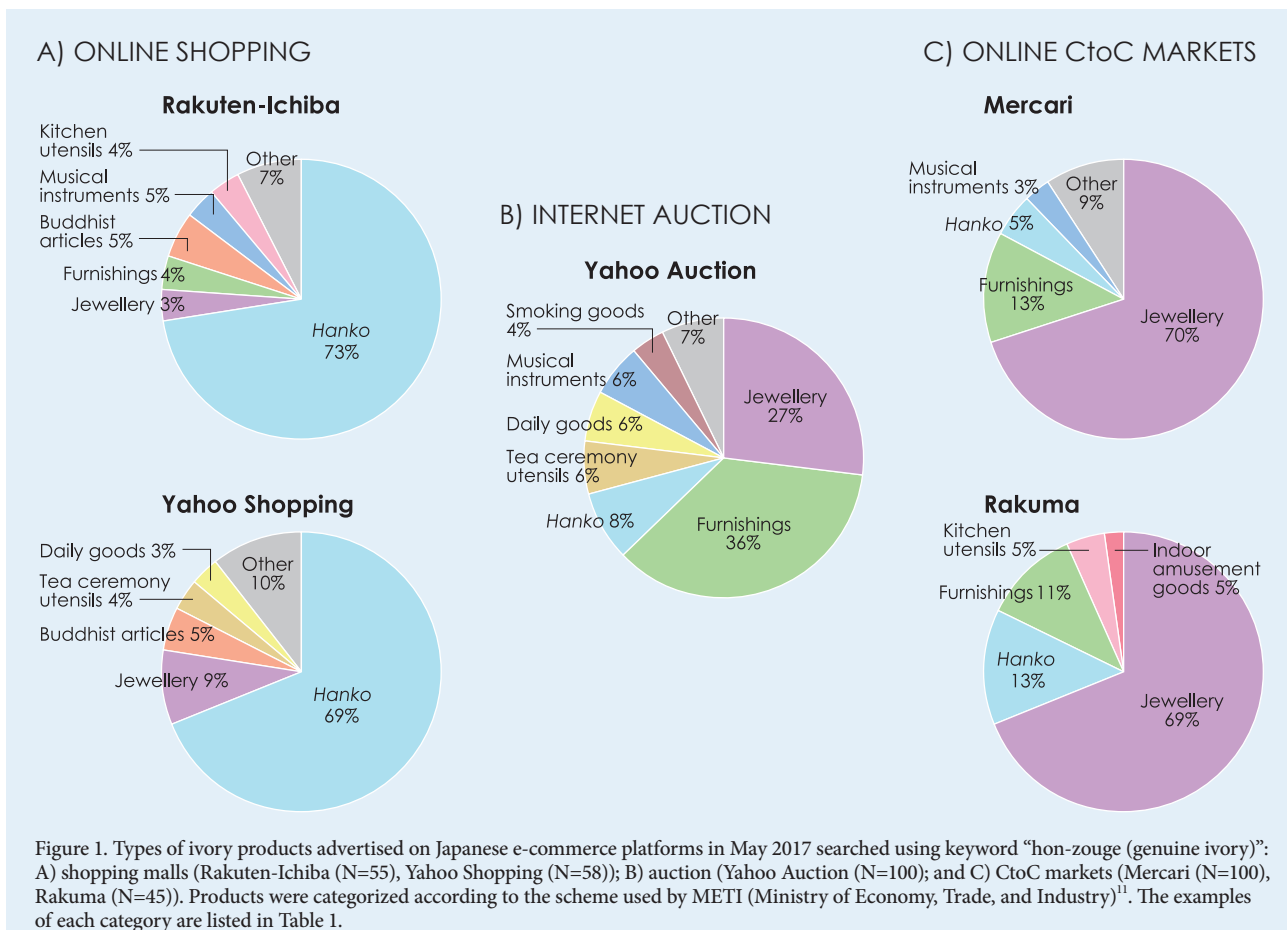
RESULTS AND DISCUSSION

Overall results of search trends

The number of shops selling ivory nearly halved in the recent survey compared to 2014 on Rakuten-Ichiba (from 107 to 55 shops), but a similar number of shops were found on Yahoo Shopping (58 shops), which was not surveyed in 2014. Search results on Yahoo Auction for “hon-zouge” (genuine ivory) increased by 52% compared to 2014 (from 2,737 hits to 4,158 hits). This increase follows a rise in the overall number of advertisements on Yahoo Auction at a given time, which shifted from roughly 32 million in 2014 to 50 million in 2017¹⁰. Thus, any increase in the number of hits for “hon-zouge” could simply reflect the general expansion of overall activity on this site. Of the two CtoC market sites surveyed for the first time in the present study, Mercari is substantially larger and returned numerous advertisements with the keyword, though the total number of hits could not be determined due to the nature of the technology. Only 45 advertisements were found on Rakuma. It should be emphasized that the keyword “hon-zouge” for genuine ivory is not designed to be exhaustive and, therefore, the actual number of ivory products on each site is much larger. Overall, the increased number of hits in Yahoo Auction may not be a good indicator, but the abundance of advertisements on new sites like Mercari indicates that online ivory trade in Japan is using diversified channels since 2014, though identifying the definitive characteristics of this result is not possible at this time.

Pattern of trade across online platforms

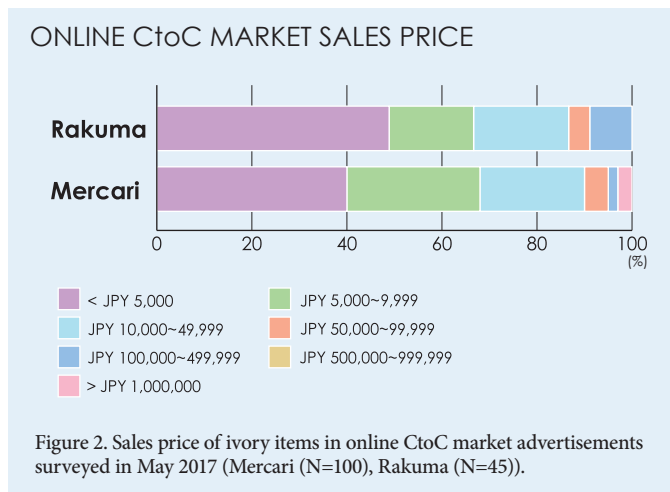
The snapshot survey revealed distinct patterns of online trade for shopping malls, auction and CtoC market sites (Fig. 1). For shopping malls where new products are offered, *hanko* shops by far constituted the majority, whereas on the auction site, furnishings such as carvings and *netsukes* were the largest product type followed by jewellery. These patterns were more or less similar to what was found in the 2014 survey. The third pattern was found in the CtoC market sites, where ivory jewellery comprised the majority of items offered for sale, followed by carvings and furnishings.



10 <https://about.yahoo.co.jp/pr/release/2014/09/01a/> <http://topic.auctions.yahoo.co.jp/promo/infographic/#exhibits>

11 http://www.meti.go.jp/policy/mono_info_service/mono/paper_consumergoods/20150812tebiki.pdf

The extensive availability of old ivory jewellery is a characteristic of Japan's ivory antiques market as a result of massive domestic production, as well as import of such products during the 1970s and 1980s. The rise of CtoC trading amongst individuals using smartphones seems to have provided a ready channel for re-selling of such antique items. While close to 70% of ivory items offered on CtoC market sites were under JPY10,000 (USD90), there were certain items offered at a high price range of over JPY100,000 (USD900) or even over JPY1 million (USD9,000) (Fig. 2), which were large, elaborate carvings.



Trade monitoring

Four-weeks of monitoring revealed an active ivory trade on both Yahoo Auction and Mercari, but the former dwarfed the latter in scale. A total of 9,788 items (an average of 2,447 per week) were sold on Yahoo Auction, while 573 new items (an average of 143 per week) were advertised on Mercari. Given that the 9,788 items on Yahoo Auction are actual transactions that occurred during the four-weeks, this represents a considerable volume of traffic. Although actual sales on Mercari could not be tracked, 27% of items in the snapshot sample were marked as “sold”. In Yahoo Auction, jewellery comprised the largest number (5,410 pieces), and a lot of them were offered in bulk. Similarly, there were bulk offerings of up to 70 *hanko* in a single lot. There were also certain categories of products that were numerous, with ivory comprising only a small part of the item in question, namely ivory lids on traditional pottery used in tea ceremonies and ivory weights used for traditional hanging scrolls. Furthermore, everyday semi-processed ivory was sold on Yahoo Auction, amounting to a total of 59.5 kg of small pieces of various shapes and over 5,000 pieces (mostly beads) of unknown weight. There were also a few offerings of semi-processed ivory on Mercari, including 1 kg of edge pieces, 20 edge pieces and one slice of unknown weight. Whole ivory tusks were observed on both sites. A total of 22 polished and carved tusks were sold on Yahoo Auction, whereas one polished tusk was advertised on Mercari.

Table 1. Count of ivory containing items on Yahoo Auction (successful bidding records) and Mercari (new advertisements) over a four-week period between 8th May and 4th June 2017. Multiple items sold in the same lot were counted individually.

| Category of ivory containing items | | Mercari (new advertisements) | Yahoo Auction (successful bids) |
|--|----------------|---------------------------------|------------------------------------|
| Whole tusk | | 1 polished tusk | 22 tusks (polished/ carved) |
| Semi-processed pieces | Weight known | 1 kg small pieces | 59.5 kg small pieces |
| | Weight unknown | 21 small pieces | 5,262 small pieces |
| Jewellery : necklaces, earrings, brooches, string ties, ornamental clasps for holding obi | | 417 | 5,410 |
| Hanko : new <i>hanko</i> , carved/used <i>hanko</i> | | 25 | 1,000 |
| Carvings & furnishings : <i>netsukes</i> , ornamental objects, incense burners | | 18 | 974 |
| Stationary : pens, paper knives | | 0 | 8 |
| Smoking goods : pipes, cigarette holders | | 4 | 329 |
| Buddhist articles : Buddhist prayer beads | | 1 | 18 |
| Japanese musical instruments : <i>bachis</i> , <i>shamisen</i> , <i>koto</i> , tuning pegs for <i>shamisen</i> , bridges and plectra of <i>koto</i> | | 23 | 387 |
| Other musical instruments : guitar saddles | | 2 | 26 |
| Kitchen utensils : chopsticks, chopstick rests, toothpicks | | 31 | 325 |
| Tea ceremony utensils : lids, teaspoons, tea canisters | | 16 | 394 |
| Indoor amusement goods : Mahjong tiles, pool balls, dice | | 10 | 50 |
| Daily goods : parts for hanging scrolls, shoehorns, fans, ear picks | | 26 | 845 |
| Other : parts for Japanese swords | | 0 | 22 |
| Total (excluding whole tusks and semi-processed ivory) | | 573 | 9,788 |



Looking at the price range of sales on Yahoo Auction, 42% were less than JPY5,000 (USD45), followed by 30% between JPY10,000 to 50,000 (USD90 to 450) (Fig. 3). Items sold at the high end of the price ranges were figurines and whole tusks. Finally, the total trade value of ivory items on Yahoo Auction over the four-weeks amounted to over JPY45.2 million (USD407,000). Of these, whole tusks represented only 2% and semi-processed ivory 6% of the trade by value. The remaining 92% of the trade comprised other products consisting largely of ivory jewellery, carvings and furnishings. It should be kept in mind that both counts and trade value recorded here may include some fake ivory as it is impossible to distinguish genuine products with certainty through online advertisements. In fact, offerings of mammoth ivory figurines were also observed with explicit identification as mammoth ivory. Furthermore, it is known that *netsukes* (small Japanese traditional figurines) made of mammoth ivory as well as other animal tusks, bones, or antlers are sometimes difficult to distinguish from elephant ivory.

2014-2017 comparison of legality signs

Comparison with 2014 data revealed a significant improvement in the LCES compliance regarding obligatory business notifications¹², with 88% and 85% on Yahoo Auction and Rakuten-Ichiba, respectively, displaying notification numbers in 2017 compared to the small minority (11% and 22%, respectively) that did so in 2014 (Fig. 4). While a majority indeed operated without making notifications in 2014, all but three shops in Yahoo Shopping who sold smaller pieces of ivory (e.g. ivory handled knives, accessories, shoehorns) were confirmed to have made notifications in 2017. Upon notice from TRAFFIC, Yahoo notified these three shops about their state of non-compliance with ivory trading regulations and, as of 27th June 2017, one of them had removed all ivory products and another displayed a newly issued notification number. The actual notification status of the three shops on Yahoo Auction could not be checked due to lack of business information.

This significant improvement comes as a result of monitoring initiatives taken by e-commerce companies following the publication of TRAFFIC's first report in 2014. In addition, regulatory requirements have also been strengthened by the government to upgrade the notification system into a proper registration system, making display of a company's registration number obligatory, and guaranteeing public access to information

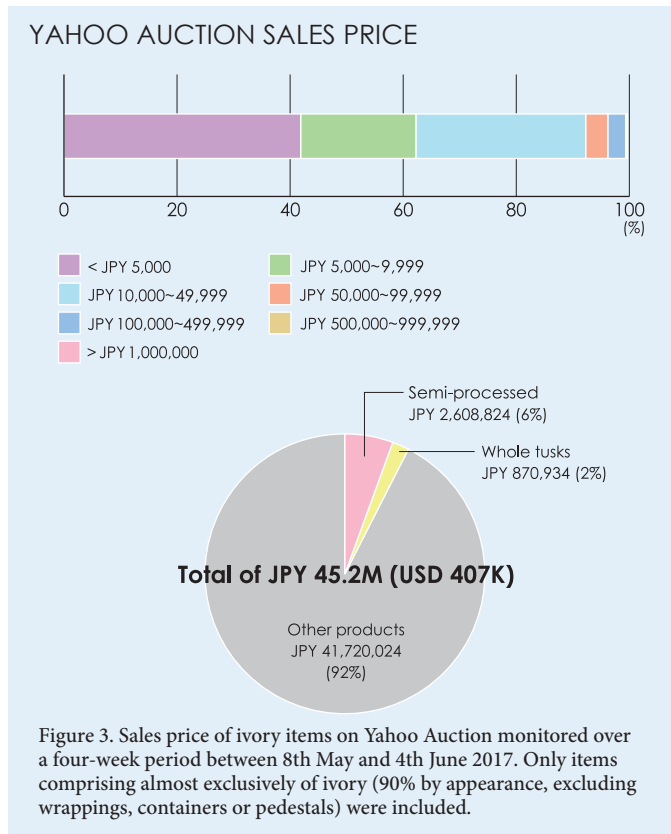


Figure 3. Sales price of ivory items on Yahoo Auction monitored over a four-week period between 8th May and 4th June 2017. Only items comprising almost exclusively of ivory (90% by appearance, excluding wrappings, containers or pedestals) were included.

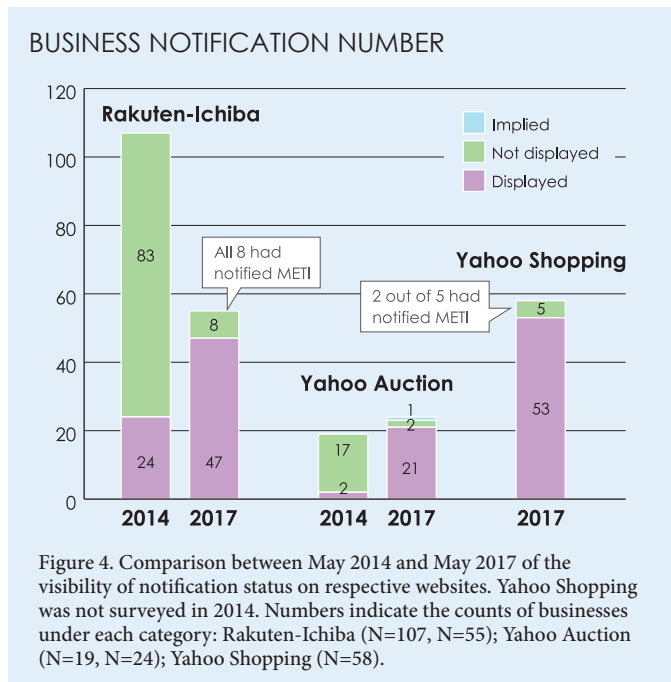


Figure 4. Comparison between May 2014 and May 2017 of the visibility of notification status on respective websites. Yahoo Shopping was not surveyed in 2014. Numbers indicate the counts of businesses under each category: Rakuten-Ichiba (N=107, N=55); Yahoo Auction (N=19, N=24); Yahoo Shopping (N=58).

¹² LCES mandates all businesses that manufacture, trade, or retail in ivory products apart from whole tusks to notify METI. All such businesses receive a sticker showing a designated operator's number and are obligated to record all transactions and resulting balances of stockpiles and submit them to METI on a regular basis. The 2017 LCES amendment upgraded this notification scheme to a "registration" scheme with enhanced penalties, which will be enacted sometime in 2018.

on registered businesses. These new reforms will be enacted in 2018.

In contrast, usage of the government-issued voluntary product certification system remained unchanged from the 2014 survey (Fig. 5). Whilst the actual use of product certificates could be higher than their visibility on websites, current evidence suggests that product certification does not constitute an effective tool for establishing the legality of worked ivory items marketed through online trading. However, the government has not yet considered reviewing the certification scheme and there are no moves to establish a compulsory certification system to ensure the legality of worked ivory products.

The only type of ivory in which trade of individual items is regulated concerns whole tusks. Of the 27 whole tusks offered at the time of the snapshot survey on Yahoo Auction, all but four tusks were accompanied by the registration cards required under the LCES, whereas on the Mercari site, the emerging CtoC market giant, only three out of nine tusks were accompanied by the requisite registration cards (Fig. 6). The higher rate of compliance with the registration card system on Yahoo reflects the concerted effort by that company to conduct regular monitoring of whole ivory tusks to ensure registration. In fact, every whole tusk found with keyword “hon-zouge (genuine ivory)” in Yahoo Auction’s successful biddings records had a registration card, highlighting the effectiveness of their monitoring programme. On the other hand, it remains a possibility that platforms with looser monitoring and enforcement could provide an opening for illegal trade. Across both websites, many of the offers without registration cards were tusks with extensive curvature, pointing to a possibility that sellers would not necessarily have recognized them as “ivory tusks”. In any case, there remain enforcement challenges in the trade of whole tusks.

Regulatory loopholes

The lack of control over CtoC trading has become evident in the current study, both on internet auction and emerging online CtoC markets. While nearly half (22 out of 47) of the auction sellers on Yahoo Auction did not identify themselves as businesses, most of them (18 out of 22) could be inferred to be using internet auctions for commercial purposes

PRODUCT CERTIFICATION

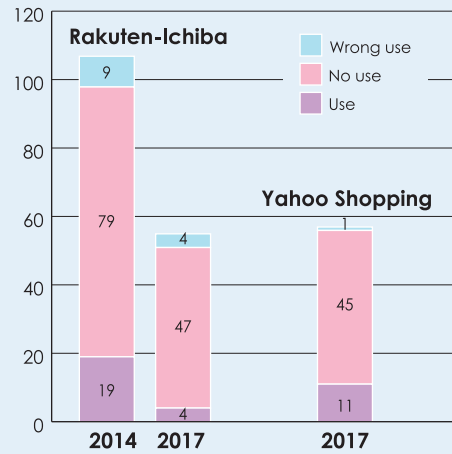


Figure 5. Comparison of voluntary product certification use between May 2014 and May 2017 for Rakuten-Ichiba (N=107, N=55). Yahoo Shopping was only surveyed in 2017 (N=57). Numbers indicate the count of businesses indicating that they provide product certifications. “Wrong use” was where the image of a product certification seal was displayed along with business notification numbers as though it was a certificate of business operation.

WHOLE TUSK REGISTRATION

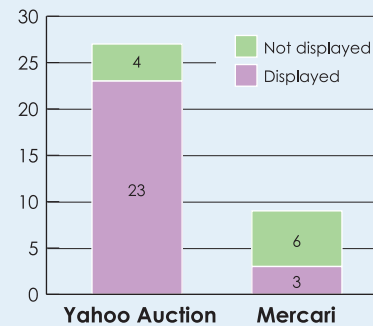


Figure 6. Number of whole tusks offered on Yahoo Auction and Mercari at the time of the snapshot survey (using keyword “hon-zouge (genuine ivory)”) in May 2017 and their accompaniment of legal documents (registration cards)

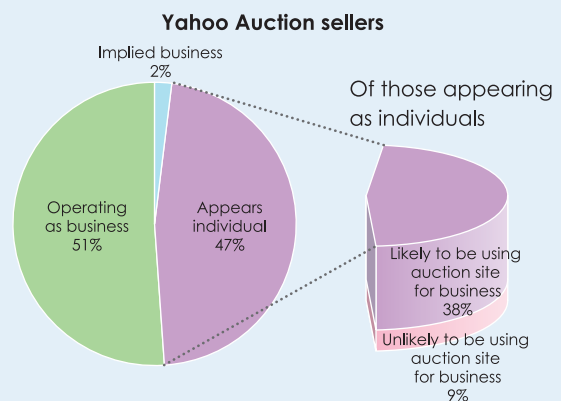


Figure 7. Identities of sellers offering ivory items on Yahoo Auction in a snapshot survey in May 2017 (N=47). For sellers appearing as individuals (no indication of business entities), their list of other active auctions was checked to deduce if they were merely selling off personal items or using the auction site for business.

rather than selling off personal items, based on the list of other auctions they were holding (Fig. 7). Although none of them specialized in ivory, they held at least 25 active auctions simultaneously (up to 1,480 lots) of mostly antiques and collectables. Two shops had fewer simultaneous active auctions (8 and 16 respectively), but sold only highly specialized products which were unlikely all to be personal belongings (i.e. parts of Japanese swords and Japanese musical instruments, respectively); thus, they were grouped with sellers likely using auction sites for business. Although it cannot be determined from the snapshot survey what proportion of individual sellers trade ivory items regularly, at least four out of 22 sellers “appearing as individuals” offered multiple ivory items. Furthermore, the snapshot survey of CtoC markets also revealed a significant proportion of sellers offering multiple ivory items (23% and 25% in Mercari and Rakuma, respectively) and some sellers are evidently operating businesses on these platforms, even promoting ivory items for their increasing rarity. These findings highlight the need for the government to scrutinize ivory businesses operating online to ensure effective enforcement of the strengthened ivory business regulations brought forth through recent LCES amendments.

Furthermore, whether the sellers function as a business or not, the lack of regulation for products other than whole tusks was found to present severe challenges in identifying and preventing illegal ivory flows. For example, surveyors found on Mercari a few advertisements for ivory jewellery recently brought back from Asia and Africa with explicit statements about their origins (Fig. 8). While these are clear infringements of CITES regulations, their domestic sales remain legal under the LCES, which allows them to be traded without any requirement for proof of legality (e.g. CITES import permit or the LCES registration)—unless they are whole tusks, in which case only registered pre-Convention tusks can be traded legally. Therefore, since both pre- and post-Convention ivory products can be freely traded without any requirement of proof, it is often impossible to be sure that a particular ivory item is of bona fide pre-Convention origin, especially for ivory jewellery as well as certain types of figurines with carving styles different from traditional Japanese motifs. Although the extent of illegal import seen in the above examples remains unknown, there is a clear and urgent need for appropriate regulation and awareness-raising amongst Japanese tourists and consumers domestically.

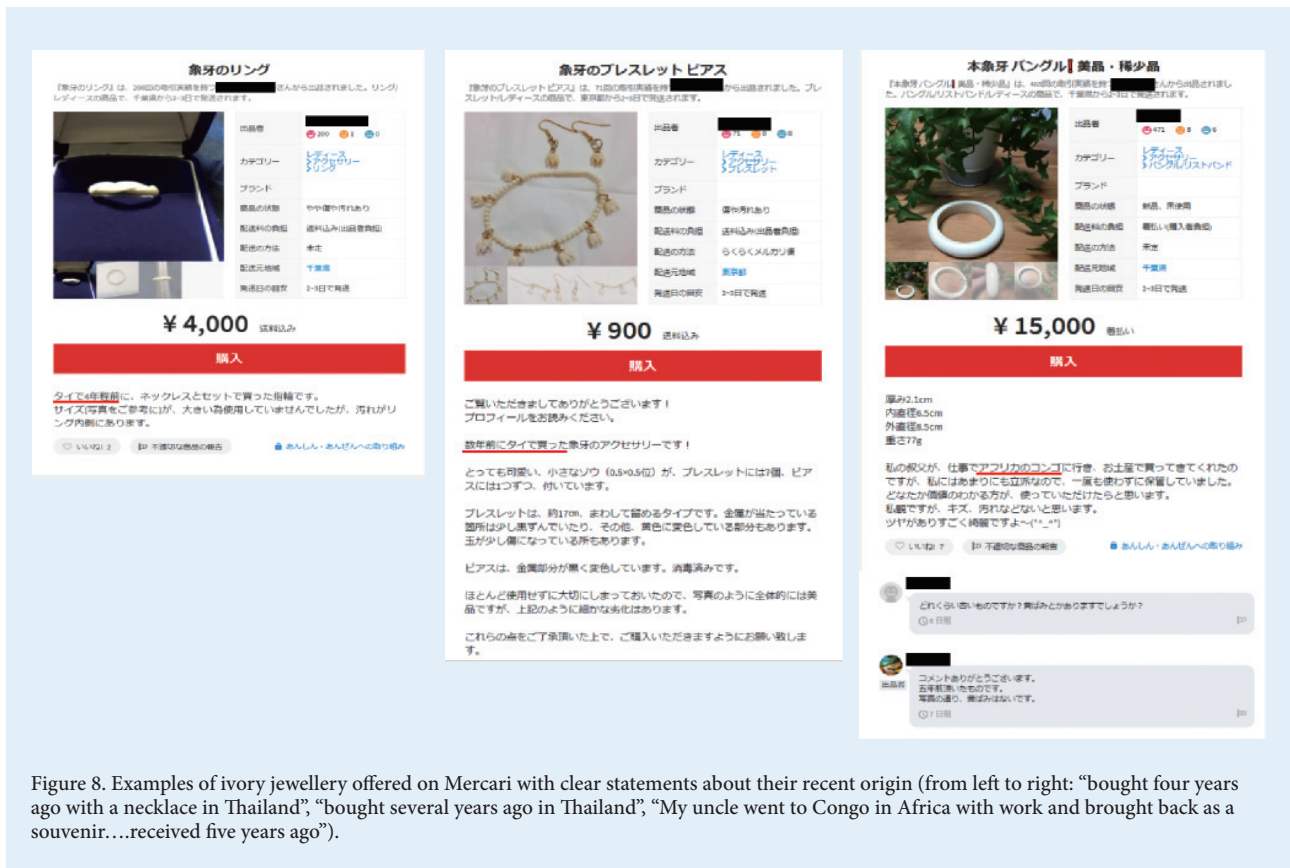


Figure 8. Examples of ivory jewellery offered on Mercari with clear statements about their recent origin (from left to right: “bought four years ago with a necklace in Thailand”, “bought several years ago in Thailand”, “My uncle went to Congo in Africa with work and brought back as a souvenir....received five years ago”).

In sum, the coverage of the current LCES regulation with respect to online ivory trading is patchy at best as only business operations and trade in whole tusks are subject to the law (Table 2). In terms of sellers, unidentified businesses and individuals widely trading in auctions and CtoC market sites currently remain outside the regulatory radar. In terms of products, whole tusks represent a tiny proportion of the trade offered on almost all websites, so the large quantities of other products traded by non-business sellers are therefore completely outside of the LCES control. This situation is of concern given the active online trading and difficulties in discerning bona fide pre-Convention items. Whilst the current study investigated only the online aspect of ivory trade on major e-commerce platforms in Japan, the extent of domestic ivory trade falling outside the current control system is significant when all forms of online ivory trading, such as social networking sites, and physical trading are taken into account. TRAFFIC intends to conduct further research into Japan's domestic ivory market.

Table 2. Summary of applicable LCES regulation on each e-commerce model

| | Online Shopping Malls | Internet Auction | Online CtoC Markets |
|-------------------------------|--|--|--|
| Regulation of sellers | Yes (businesses) | Yes/No (businesses and individuals mixed) | No (individuals) |
| Regulation of traded products | Only whole tusks and limited use of voluntary certifications in <i>hanko</i> | Only whole tusks, no regulation for other products | Only whole tusks, no regulation for other products |

RECOMMENDATIONS

In spite of the methodological limitations in establishing the scale of online trade through monitoring surveys, the apparent significant number of ivory products being offered and traded online in Japan is of concern. The CITES Parties, in Resolution Conf. 10.10 (Rev. CoP17) on *Trade in elephant specimens* adopted in October 2016, recommended:

... that all Parties and non-Parties in whose jurisdiction there is a legal domestic market for ivory that is contributing to poaching or illegal trade, take all necessary legislative, regulatory and enforcement measures to close their domestic markets for commercial trade in raw and worked ivory as a matter of urgency;

RECOGNIZES that narrow exemptions to this closure for some items may be warranted; any exemptions should not contribute to poaching or illegal trade;

URGES those Parties in whose jurisdiction there is a legal domestic market for ivory that is contributing to poaching or illegal trade and that have not closed their domestic ivory markets for commercial trade in ivory to implement the above recommendation as a matter of urgency;

FURTHER URGES those Parties in whose jurisdiction there is an ivory carving industry, a legal domestic trade in ivory, an unregulated market for or illegal trade in ivory, or where ivory stockpiles exist, and Parties designated as ivory importing countries, to ensure that they have put in place comprehensive internal legislative, regulatory, enforcement and other measures to:

- a) regulate the domestic trade in raw and worked ivory;*
- b) register or license all importers, exporters, manufacturers, wholesalers and retailers dealing in raw or worked ivory;*
- c) introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the movement of ivory within the State, particularly by means of:

 - i) compulsory trade controls over raw ivory; and*
 - ii) comprehensive and demonstrably effective stock inventory, reporting, and enforcement systems for worked ivory;**

As a CITES Party, Japan has an obligation to fulfill these requirements effectively to ensure that domestic trade in ivory does not contribute to poaching or to illegal trade. Internet trading channels are creating new regulatory challenges for Japan and need to be addressed with urgency.

TRAFFIC recommends the following:

- The Japanese government should assess the feasibility of installing stricter measures to address all aspects of its internal ivory trade effectively, including trade in all product types (whole tusks or pieces, and all forms of worked ivory), new and old, and trade by and amongst non-business entities.
- The Japanese government should urgently capture the identities of, and register sellers offering ivory through online platforms. CITES requirements explicitly call for the registration or licensing of “*all ... wholesalers and retailers dealing in raw or worked ivory*”. Failure to do so would be considered non-compliance with CITES Resolution Conf. 10.10.
- E-commerce companies and relevant ivory industry stakeholders should consider adopting stricter measures than LCES provides, with an aim to preclude ivory of illegal origin being traded without legal consequences. To this end, e-commerce platforms should consider banning online ivory trade.
- E-commerce companies and NGOs should assist in awareness-raising amongst users of e-commerce sites not only to disseminate CITES and LCES regulations but also to mainstream the issues of illegal wildlife trade and wildlife cybercrime as a serious crime.

TRAFFIC, the wildlife trade monitoring network, is the leading non-governmental organization working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

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