

A CITES PRIORITY

THE WORLD'S UNREGULATED DOMESTIC IVORY MARKETS

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**IN SPITE OF
A WORLDWIDE BAN
ON INTERNATIONAL TRADE
IN IVORY SINCE 1989,
MANY LARGE, UNREGULATED
DOMESTIC MARKETS
ARE STILL THRIVING
IN PARTS OF AFRICA
AND ASIA - THREATENING
NATIONAL ELEPHANT
POPULATIONS AND
DRIVING A SIGNIFICANT
ILLEGAL TRADE.**

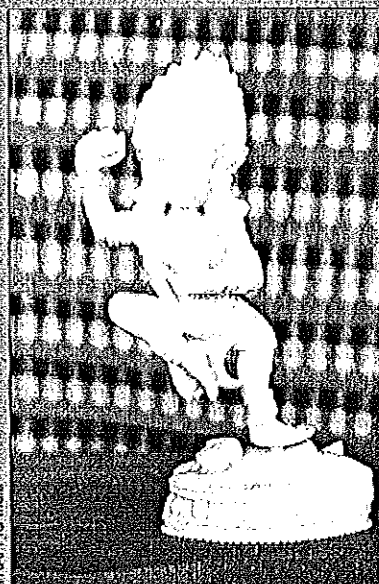
The root of the problem

Following a documented decline of the African Elephant, in 1989, the members of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) took a momentous decision to list all elephant populations in Appendix I of the Convention. Taking effect in January 1990, this move had the effect of imposing a global ban on all international commercial trade in ivory and other elephant products.

Beyond the imposition of national import and export prohibitions, however, events under CITES generated little resonance at the domestic level. Few countries, even those which ardently championed the plight of elephants and supported the CITES trade ban, subsequently made it illegal to sell ivory that was already in their retail markets. For most countries, prohibiting the sale of pre-ban ivory stocks was legally complex and not seriously considered, but nor did such countries even make moves to register or license pre-ban ivory stocks or to create other baseline measures for the purpose of future monitoring, regulation and control of ivory trade. Consequently, domestic sales of ivory continued in most of the world's major ivory-consuming markets - from Japan, Hong Kong and China, to Europe and the USA, and throughout most Asian and African Elephant range States - with little means to differentiate between pre-Convention or pre-ban stock and any other ivory that subsequently, and generally illegally, entered the market. In some markets in the northern hemisphere, demand for ivory clearly waned as consumers took note of elephant conservation campaigns in progress, but elsewhere, though it may not have been "business as usual", uninterrupted trade in ivory products continued.

The relationship between domestic ivory markets - that is, simply the availability for sale of ivory products within any country in the world - and the illegal killing of elephants and trade in elephant products has long been established. There is little doubt that domestic ivory trade within many Asian and African range States is steadily whittling away their national elephant populations and that the larger ivory markets outside range States are important drivers of elephant poaching worldwide. Regardless of this, in the aftermath of the CITES decision in 1989 to list all elephant populations in Appendix I, elephant politics at the international level largely focused on the dynamics of the CITES Conference of the Parties process and any attempt to circumvent the Appendix-I impasse. Sadly, attention to domestic ivory markets seemed to be a secondary consideration. Accountability for the presence of a thriving domestic ivory market seemed conveniently to be overlooked as long a country was vocally in support of the Appendix-I listing.

TRAFFIC tried to keep the issue of domestic ivory markets alive with its publication in 1997 of *Still in Business*, a report which addressed domestic ivory trade in eight countries in Asia, and with regular reviews of the situation in Japan. Things really began to change, however, in 2000 when Esmond Martin and Daniel Stiles published, with the support of Save the Elephants, the first instalment of what has become a serialized look at ivory markets around the world. The report, *The Ivory Markets of Africa*, was the first concerted effort to put the focus back on domestic trade in ivory in Africa. A total of 13 countries was assessed, leaving little doubt that unregulated domestic trade in ivory was the norm throughout Africa. In 2002, the second instalment, *The South and South East Asian Ivory Markets*, was published, adding contemporary assessments of eight countries with traditional ivory markets in Asia. The release of a third report, on the status of ivory markets in the Far East, is imminent. In the meantime, over the past three years, TRAFFIC has also undertaken a series of studies on a number of markets in



Africa and Asia, including China, Côte d'Ivoire, India, Indonesia, Japan, Mozambique, Myanmar, Nigeria, Senegal, Singapore, Taiwan and Viet Nam. Not since the Ivory Trade Review Group studies of 1989 has so much information been available about the scale and dynamics of domestic ivory markets around the world.

The collective finding of this body of work is that there is a lot to worry about: unregulated domestic ivory markets are alive and well throughout the world and elephants are the worse for it.

CITES and domestic trade in ivory

As early as the sixth meeting of the Conference of the Parties to CITES (Ottawa, 1987), the Parties agreed that importers and exporters of raw ivory and all enterprises that cut or carved ivory should be registered or licensed. They also proposed that there should be recording and inspection procedures to monitor the flow of ivory within countries having a domestic trade in ivory. Ten years later, at the time the Parties agreed to transfer three African Elephant populations to Appendix II and to allow highly-controlled conditional trade in elephant products, including the option for a one-off sale of existing stocks of ivory from Botswana, Namibia and Zimbabwe to Japan, these provisions were revisited and strengthened in *Resolution Conf. 10.10 (Rev.) (Trade in Elephant Specimens)*. The paragraph of the Resolution subtitled "Regarding control of internal ivory trade" sets out recommendations as follows:

"[The Conference of the Parties to the Convention]....Recommends to those Parties in whose jurisdiction there is an ivory carving industry that is not yet structured, organized or controlled and to those Parties designated as ivory importing countries, that comprehensive internal legislative, regulatory and enforcement measures be adopted to:

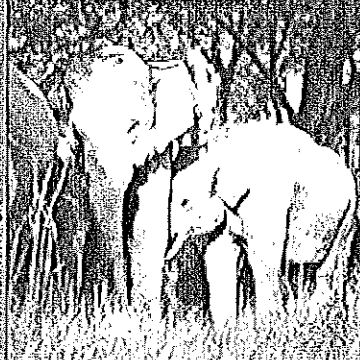
- a) register or license all importers, manufacturers, wholesalers and retailers dealing in raw, semi-worked or worked ivory products; and*
- b) introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the flow of ivory within the State, particularly by means of:*
 - i) compulsory trade controls over raw ivory; and*
 - ii) a comprehensive and demonstrably effective reporting and enforcement system for worked ivory"*

While it is accepted that the decision to allow domestic trade in ivory is an issue of national sovereignty, equally, it must be acknowledged that the lack of regulation and law enforcement in domestic ivory markets can produce impacts that extend far beyond national borders. The recommendations of the Conference of the Parties to CITES are designed to ensure that negative impacts and consequences of domestic ivory markets are reduced without directly impinging upon the national sovereignty of individual countries.

Internal trade in ivory can result from legal, pre-ban ivory stocks and products, including antiques, from ivory legitimately obtained in a range of State through management initiatives directed at wild or domesticated elephants and, in the case of Japan, from the one-off, CITES-approved import of ivory in 1999. Equally, internal trade in ivory can be derived from the illegal killing of elephants, either locally or elsewhere, and from the illegal import of stocks or products. The challenge is to differentiate the latter from the former.

CITES calls upon all countries with domestic ivory markets to document, through licensing and registration schemes, all individuals or businesses engaged in trade in ivory, and to ensure that raw ivory is subject to compulsory, comprehensive controls. CITES also calls for the active monitoring of domestic trade in ivory through appropriate regulatory and law enforcement activities. The objective of these recommendations is to ensure that illegally derived ivory or ivory products are prevented from entering and becoming a significant part of these domestic markets. When these recommendations were re-drafted in 1997, Japan was in everyone's minds. It was a reasonable expectation that, as the only designated recipient of CITES-approved ivory, Japan should set the standard with a robust system of control over its domestic trade in ivory. Consequently, the Parties directed the Panel of Experts, a specially designated body charged with assessing proposals to transfer elephants from Appendix I to Appendix II, to review the Japanese system against the

Wild Asian Elephant
Elephas maximus family



criteria established in *Resolution Conf. 10.10 (Rev.)*. Likewise, Zimbabwe, which proposed to allow non-commercial trade in manufactured ivory products, was also assessed in this manner. Through this process, both countries were required to strengthen their control systems for domestic trade in ivory before the Panel of Experts certified that the CITES conditions had been met. Today, Japan and Zimbabwe theoretically have the best control systems in the world.

The impact of domestic ivory markets on elephants

Apart from in Japan and Zimbabwe, CITES has not directly intervened to assess compliance with the recommendations for internal trade in ivory as contained in *Resolution Conf. 10.10 (Rev.)*. The disturbing fact is that, with few exceptions, most domestic ivory markets remain grossly unfettered. In the end, "domestic" trade in ivory gives rise to trade which is decidedly "international" in scope. Most ivory markets exist because of the illegal inward flow of raw ivory for manufacturing purposes, and of semi-worked and worked ivory for sale at wholesale and retail levels, while there is a persistent illegal outward flow of worked ivory products.

The reports from the Elephant Trade Information System (ETIS), one of the two monitoring systems operating under the auspices of CITES to track illegal trade in elephant products, deliver a strong indictment of the role currently played by domestic ivory markets in undermining elephant conservation in Africa and Asia. The ETIS analysis clearly demonstrates that illicit trade in ivory is most directly correlated to the presence of large-scale, unregulated, domestic ivory markets which exhibit a poor degree of law enforcement effort. It is an issue of major concern that these markets have generally become more active since 1996. There is little doubt that controlling these markets is the single-most important challenge facing CITES with respect to elephant conservation today.

The world's domestic ivory markets

Where are the world's domestic ivory markets today? The following is a summary of the "hotspots":

East Asia

The scale of the domestic ivory trade in China remains to be quantified adequately, but there is little doubt that ivory consumption has rapidly increased in recent years. In fact, ETIS reports identify China as the leading ivory importer today and the main driver for the upward trend in ivory seizures since 1998. Observers of China's ivory trade report that the traditional State-run ivory processing centres, the "backbone" of the trade prior to 1990, are undergoing profound change and apparently scaling down their ivory operations. At the same time, new trade dynamics are rapidly emerging in the face of the expansion of private enterprise opportunities and the introduction of market-economy forces. The development of Chinese involvement in African-based ivory processing operations for the Asian market has been documented in various studies and it is believed that the products are marketed through non-traditional channels in China. The Chinese Government is taking positive steps to interdict the flow of ivory coming into the country, but China is certainly one of the main countries to watch in the future.

Hong Kong remains a significant domestic ivory market. At the time of the CITES ban on commercial international trade in ivory in 1990, Hong Kong held the largest documented stockpile of ivory in the world and, prior to the trade ban, had the largest ivory industry and consistently consumed the greatest volume of ivory globally. Well before the CITES trade ban, Hong Kong established a regulatory system that generally met the requirements of *Resolution Conf. 10.10 (Rev.)*. Judging by the frequency of ivory seizures reported to ETIS involving Hong Kong, however, there could be serious monitoring and law enforcement issues relating to the disposal of the stocks of ivory accumulated prior to the trade ban of 1990. Ivory products remain widely available in Hong Kong.

Widely perceived as the "ultimate" ivory market, Japan is perhaps less of a problem today than one might suspect. As mentioned, according to a formal CITES review by the Panel of Experts, Japan was judged to have met the conditions stipulated in *Resolution Conf. 10.10 (Rev.)*. Ivory tusks that are held for the purposes



Ivory carvers in Myanmar

of trade in Japan are subject to registering and marking controls, so that individual tusks can be tracked through the manufacturing process to retail level. A sophisticated database system records these inventories. All retail outlets selling ivory name-seals are obliged to notify the government and are subject to registration and monitoring controls. Japan has arguably the most comprehensive control system for ivory in the world, yet still attempts to move ivory illegally into Japan continue to occur. In April 2000, a member of the Japanese Ivory Association was implicated in an attempt to import ivory illegally into Japan from Singapore. More recently, a seizure of over six tonnes of ivory shipped from Malawi was intercepted in Singapore, reportedly en route for Japan. Such challenges to the Japanese system will no doubt continue, necessitating strict vigilance on the part of law enforcers.

As another Asian consumer, Taiwan also bears watching, a point confirmed by the ETIS reports. The commitment to prevent contraband wildlife products entering Taiwan has led to many important ivory seizures in recent years. In fact, six of the 30 largest seizures recorded by ETIS have occurred in Taiwan. Despite these data, indicating demand for ivory within Taiwan, a recent survey of the domestic ivory market in Taiwan indicates a decline in availability and sales. Internal regulation in Taiwan has generally been strict, but recent changes in the designation of the authorities responsible for regulating domestic trade in ivory need to be carefully monitored. It is difficult to understand the disparity between recent, large-scale ivory seizures, on the one hand, and a declining local ivory market on the other. For this reason, the role of Taiwan as an entrepôt for ivory should not be discounted without further examination. Mainland China would seem to be the most likely recipient of ivory from Taiwan, which would probably be transferred by sea across the Taiwan Straits, as has been documented for other wildlife products.

Southeast Asia

Thailand has recently been described by Martin and Stiles as by far the largest market for worked ivory in South and Southeast Asia. In the ETIS reports, Thailand ranked next to China as the largest unregulated ivory market in Asia. Although Thailand is an Asian Elephant range State, legal domestic sources of ivory cannot possibly support an ivory processing industry of over 75 carvers. Consequently, it is believed that illegal imports of raw ivory from Africa and neighbouring countries, particularly Myanmar, sustain this trade, which possibly reduces poaching pressure on Thailand's wild elephant population, but which certainly produces negative impacts elsewhere. Without a strict regulatory framework, manufacturing and retail sales of ivory products go largely unchecked. Tourists to Thailand are targeted as consumers. There is little doubt that Thailand's ivory trade represents a major challenge to CITES.

After Thailand, Myanmar has the second-largest ivory processing industry in Southeast Asia, which enjoys a degree of government support and encouragement. With over 50 carvers, including some master craftsmen, Myanmar has ivory products widely available at tourist destinations in Yangon and Mandalay. While most ivory used in manufacturing reportedly comes from local populations of Asian Elephants, their numbers are dropping and the situation cannot be sustained beyond the current decade. Legally speaking, the situation is ambiguous, but for the most part the trade operates with little, if any, regulation. The movement of ivory from Myanmar, both raw tusks and worked products, across the border to Thailand and China has been documented.

Although a major entrepôt for illicit ivory through the mid-1980s, Singapore acceded to CITES in 1987, after which the situation changed. While there are strict national controls for ivory trade, items registered with the government prior to November 1986 can still be sold. Recent surveys of Singapore's domestic ivory market indicate a major decline in the local industry. The number of retail outlets for ivory products has apparently decreased significantly and there have been no ivory carvers in Singapore for over a decade. Seizure data in ETIS indicate that there have been periodic illegal attempts to move semi-worked and raw ivory, that allegedly originated from Singapore's pre-Convention ivory stocks, to other countries, notably Japan. In this regard, local controls and monitoring of the disposal of the registered ivory stock perhaps need to be reviewed and probably strengthened. Finally, because of well-developed air and shipping links, it is likely that Singapore will remain as an important transit country for illicit consignments of ivory moving between Africa and Asia.

Within Indochina, Viet Nam conducts the largest trade in ivory, with products readily available in many souvenir shops in Hanoi and Ho Chi Minh City. While the legal situation generally prohibits the killing of



A 'jade market' in Taipei, Taiwan. Jade markets are sometimes outlets for ivory in Taiwan.



The "hotspots" of the world's domestic ivory markets.

elephants and trade in ivory, loopholes apparently allow the possession of ivory from domesticated elephants or the sale of "old" ivory, which complicates effective law enforcement. One recent study identified at least 22 ivory carvers in Viet Nam and the marketing of ivory products is directed at tourists to a considerable extent.

Elsewhere in Indochina, smaller-scale trade in ivory products has been noted in Cambodia and Lao PDR. In fact, Cambodia is reported to have as many as 30 ivory carvers and the trade there may be increasing. For this reason, a watching brief should be kept on Cambodia as its economy, particularly its tourist industry, expands.

South Asia

With the largest population of Asian Elephants, India is not only a very important range State, but also has traditionally been the major producer and consumer of worked ivory products in South Asia. Prior to the imposition of the CITES trade ban in 1990, most of the ivory carved in India originated from Africa. India deserves credit for being one of the only countries in the world to ban the sale of pre-ban stocks of ivory and ivory products. Since then, the open display and sale of worked ivory products has largely diminished, making it difficult to evaluate the extent of local demand and trade. Recent TRAFFIC research and continuing large-scale seizures of worked ivory products, however, indicate that the trade continues but has largely shifted underground, hindering law enforcement. Further, India has recently been identified as a source of both raw and worked ivory products in neighbouring countries, including Nepal and Sri Lanka. The fact that nearly 90% of the total volume of seized ivory implicating India represents in-country seizures is an indication that law enforcement efforts in India are meeting with some success. While the current ivory trade situation in India is perhaps not as clear as in many other countries, it does warrant urgent attention.

Japanese certification seal



On a much smaller scale, Nepal and Sri Lanka, both Asian Elephant range States, also have small domestic trades in ivory. Both countries prohibit domestic trade in ivory but, with enough determination, persistent buyers will find ivory products on the market, some of which derive from India.

North Africa

Although Egypt is not an African Elephant range State, one of the continent's largest domestic ivory markets is found within its borders. Trade in ivory is directly associated with the country's tourist industry which caters to over three million visitors annually. The ivory products openly displayed in the major tourist centres of Cairo, Luxor and Aswan are reportedly supplied from ivory derived from poached elephants in Central and West Africa. Recent large-scale seizures of raw ivory in Egypt are perhaps an encouraging sign that the authorities are beginning to tackle this problem, but it is unclear if there has been any commensurate action directed at the unbridled retail-trade. For effective control to emerge, a comprehensive regulatory framework needs to be imposed on the retail sector. The evidence suggests that Egypt continues to be a major destination for ivory flowing out of Central and East Africa.

West Africa

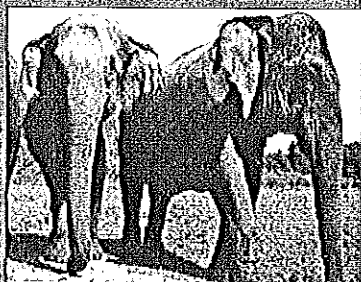
Recent studies indicate that the domestic ivory trade in Nigeria appears to be increasing. Within the country, Lagos harbours the most retail outlets, but ivory products are also available in Kano, Abuja, Kaduna and other major cities or tourist destinations. The fragmented federal system of government in Nigeria has led to a very confused legal situation and the military control of most ports complicates effective law enforcement with respect to trade in wildlife products. With few elephants locally, the Nigerian ivory markets are reportedly supplied from Central Africa, with the Democratic Republic of the Congo, the Central African Republic, Congo, Gabon and Cameroon being the most frequently cited sources. Nigeria has also been identified as a regional entrepôt for raw ivory which is subsequently shipped to destinations in Asia. In the ETIS reports to CoP12, Nigeria has been identified as the most problematic country within Africa in terms of its involvement in illicit trade in ivory.

The largest domestic ivory trade in West Africa has always been found in Côte d'Ivoire, although it is reported that the trade was officially banned in 1997. Since then, trade volumes appear to be dropping, but the number of retail outlets show little change and effective enforcement remains a serious issue. As the national elephant population is relatively small, the scale of the domestic ivory trade is certainly not supported and sustained through local offtake. Most reports assert that carvers and traders from Côte d'Ivoire are regularly supplied with ivory from Central Africa, particularly the Democratic Republic of the Congo, Cameroon, Gabon and the Central African Republic. While Côte d'Ivoire had not reported any ivory seizures to ETIS prior to the production of the CoP12 reports, the country has been implicated in nearly 100 ivory seizures that have occurred elsewhere. Although the ivory trade in Côte d'Ivoire may be in decline, it nonetheless remains a significant problem for effective elephant conservation in the region.

Within the region, Senegal and Ghana also harbour important domestic ivory markets. While neither country has reported any ivory seizures to ETIS, both nations are fairly frequently identified in the context of seizures that occur elsewhere in the world. In Senegal, Dakar is the centre of the trade, with over 30 active carvers and more than 50 retail outlets for ivory products. In Ghana, the major craft market in Accra is the principal outlet for ivory products in that country. Again, both countries reportedly obtain raw ivory from elsewhere, principally Central African countries, or from Côte d'Ivoire and, sometimes, Guinea in West Africa. The legal situation is ambiguous, at best, in these countries and there appears to be little attempt at effective law enforcement effort. Senegalese traders are reputed to circulate widely throughout Africa in search of ivory and other wildlife products.

Central Africa

Cameroon has the largest domestic ivory trade in Central Africa, with major markets in Douala, the commercial centre, and Yaounde, the capital city. In the past, Maroua in the extreme north of the country also had a domestic ivory trade, although this city has not been surveyed in recent years. While trade volumes may be dropping, recently-observed markets still remain active. The legal situation seems to provide for conditional trade in ivory, but effective law enforcement is lacking and there are few controls in practice. As the most efficient shipping and airline hub within the region, Cameroon also functions as



David Lawton/WWF UK

a major entrepôt and outlet for illicit shipments of raw ivory to destinations abroad. There is little doubt that ivory which originates from surrounding countries, particularly the Central African Republic, the Democratic Republic of the Congo, Congo and Gabon, regularly moves through Cameroon ports of exit, often hidden within consignments of timber. Overland routes through Cameroon are also reportedly used to move considerable volumes of ivory into Nigeria.

Although smaller in scale than the domestic ivory markets found in West Africa and Cameroon, the **Democratic Republic of the Congo** has a significant ivory trade in its capital city Kinshasa. Some 30 retail outlets were recently observed in one survey, although it is acknowledged that this represents a considerable decline since previous studies. Like Cameroon, the Democratic Republic of the Congo is also implicated as a major source of raw ivory and sometimes worked ivory products, that are traded to other parts of Africa or exported to consuming countries in Asia. The protracted state of civil unrest in eastern parts of the Democratic Republic of the Congo contributes to serious elephant poaching in the country and leads to illegal trade in ivory, both within the country and beyond its borders.

Brazzaville, the capital city of Congo, which lies just across the river from Kinshasa, has not been surveyed recently, but in the past it harboured one of Central Africa's major domestic ivory markets. In the mid-1990s, one long-term study monitored the sale of worked ivory products from three desk-top sized stalls in Brazzaville's leading curio market. This survey documented the sale of worked ivory products representing over one tonne of raw ivory during the course of a year. As many other stalls in the same market went unobserved, the study stands as a frightening assessment of the impact of seemingly small-scale retail outlets. Since a serious period of political instability in the late 1990s, it is believed that ivory trade volumes have probably dropped, however, the current status of Congo's domestic trade in ivory remains to be assessed.

East Africa

Addis Ababa, the capital city of **Ethiopia**, hosts the largest domestic ivory market in East Africa. With a very small national population of elephants, Ethiopia's ivory carvers depend on supplies of raw ivory from elsewhere, with Kenya, the Democratic Republic of the Congo and southern Sudan generally identified as the major sources. The legal situation is rather ambiguous, with some indicating that a domestic trade ban was imposed many years ago, while others claim conditional trade remains legal. In any event, law enforcement of the current market remains completely ineffective. Ethiopia is also identified as a major supplier of raw ivory to Asian markets, particularly Thailand. In the ETIS reports, Ethiopia is identified as country of concern with respect to illegal trade in ivory.

Internal sales of worked ivory appear to be legal in **Sudan**. Recent surveys point to a decrease in the number of carvers in the Khartoum and Omdurman area, but other observers have described an increasing trade directed at the conspicuous presence of nationals from East Asian countries, including China and North Korea. Sudan is also linked to a number of important ivory seizures in Egypt, suggesting that it functions as the major transit point for ivory moving into that country. The situation remains to be fully assessed, but Sudan emerged in the ETIS reports as a country to watch.

Djibouti has also been identified as having a problematic domestic ivory market. While ivory carving does not appear to be practised locally, the crafts market along the Rue du Brazzaville features a range of ivory products that are produced in neighbouring Ethiopia. Djibouti, with an important shipping port on the Gulf of Aden, also functions as an occasional trade conduit for illicit shipments of raw ivory from the African continent. In the ETIS reports, Djibouti was identified as having a fairly important role in illegal ivory trade.

Southern Africa

The elephant population of **Zimbabwe** is currently in Appendix II with a conditional provision for trade in worked ivory products. The internal control system for this trade was assessed by the Panel of Experts in 1997 and, with further improvements, deemed to comply with the requirements of *Resolution Conf. 10.10*. Other external assessments have indicated that Zimbabwe's regulatory systems "for ivory craftsmen and vendors are the most comprehensive in Africa and are enforced by the authorities". The conditional authorization for trade of worked ivory products, for non-commercial purposes, in Zimbabwe has been generally interpreted to allow visitors to purchase not more than five locally produced ivory items with a value of less than USD500; exceptions to this rule need to be approved by the government on an individual basis. Recently, however, the

Ivory imported to Japan from Southern Africa in 1999



government has suspended ivory sales to registered manufacturers from the Central Ivory Store and has announced a review of the internal control system, following an incident where whole tusks sold to a local dealer for manufacturing purposes were allegedly illegally shipped to China.

South Africa also allows internal trade in ivory but, unlike Zimbabwe, did not seek approval of the CITES Parties to allow the export of worked ivory products for non-commercial purposes at the time its elephant population was transferred to Appendix II, in 2000. According to a number of studies, the South African domestic ivory market is primarily centred upon stock dating from before the CITES ban and sales have been in a state of decline over the last decade. Observers also report that the trade is subjected to relatively efficient law enforcement, but the monitoring of ivory stocks possibly remains an issue of some concern.

Although its elephant population remains in Appendix I, Mozambique conducts what is arguably the largest unregulated ivory trade in southern Africa. While the legal situation appears to be confused, government authorities continue to turn a blind eye to the fact that worked ivory products can be purchased even in the duty-free shopping area of Maputo's international airport and exported abroad in direct violation of CITES. Despite numerous attempts to engage the relevant government authorities on the issue, law enforcement remains poor and remedial measures fail to be taken.

The way forward

For the most part, the above-mentioned countries represent serious challenges to the international effort to curtail illicit trade in ivory. Each of these countries has relatively large-scale domestic ivory industries which are not, in most cases, adequately regulated in compliance with *Resolution Conf. 10.10 (Rev.)*. These markets stand behind the seizure of tonnes of worked ivory products globally and they are directly supported by illegal consignments of raw ivory. Authorities in these countries need to reassess the current regulatory framework in which these ivory markets exist and direct considerably more law enforcement attention towards monitoring and policing their internal trades in ivory.

In the ETIS reports, TRAFFIC has recommended the following:

- For countries which allow domestic trade in ivory and which have not been reviewed through the Panel of Experts process, a formal mechanism under the direction of the CITES Standing Committee should be initiated to evaluate compliance with the provisions outlined in the paragraph subtitled "Regarding control of internal ivory trade" of *Resolution Conf. 10.10 (Rev.)*, especially for countries of major concern.
- Where the regulatory requirements of *Resolution Conf. 10.10 (Rev.)* are not being met, Parties should be supported, through appropriate capacity-building initiatives, to improve their legal and administrative controls and law enforcement capabilities. Where countries fail to address these concerns, appropriate punitive measures should be considered.
- While better reporting of ivory seizures to ETIS remains a general concern, countries which have never or only rarely reported an elephant product seizure to ETIS, but which are frequently associated with seizures reported elsewhere, should make a special effort to review their national law enforcement data and send data to ETIS as appropriate.

**TRAFFIC,
THE WILDLIFE TRADE
MONITORING NETWORK,
WORKS TO ENSURE THAT
TRADE IN WILD PLANTS AND ANIMALS
IS NOT A THREAT TO THE CONSERVATION OF NATURE.**

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For further information on the world's domestic ivory markets see:

<http://www.cites.org/common/cop12/doc/Annex1234.html> on the CITES website

COP12 Doc 34.1 Summary report on the Elephant Trade Information System (ETIS)

COP12 Doc 34.1 Annex 1 A report on the status of the Elephant Trade Information System (ETIS) to the 12th meeting of the Conference of the Parties

COP12 Doc 34.1 Annex 2 An analysis of the spatial aspects of the elephant products seizure data in ETIS, a report to the 12th meeting of the Conference of the Parties

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