

# LAGOS, NIGERIA:

## A snapshot survey of the illegal ivory market



PHOTOGRAPHS: SONE NKOKE CHRISTOPHER / TRAFFIC

*Report by Sone Nkoke Christopher*

▲ Worked ivory items on sale at the Lekki ivory market, July 2018, Lagos, Nigeria.

## INTRODUCTION

African elephants occur in a wide variety of habitats, from tropical swamp forests to deserts (Blanc *et al.*, 2007). According to Thouless *et al.*, (2016), West Africa's elephant populations are mostly small, fragmented and isolated. The estimated number of elephants in areas surveyed within the last 10 years in West Africa was 11,489 ( $\pm$  2,582) at the time of the last survey of each area, with estimates showing a decline in Nigeria since 2006 (Thouless *et al.*, 2016). In fact, the African Elephant Status Report estimated Nigeria's total elephant population at only 94 animals and noted five sites as having "lost" elephant populations since the previous status report, but suggested that an additional 169–463 elephants may be in areas that were not surveyed (Thouless *et al.*, 2016). Indeed, the Yankari Game Reserve, with an estimated 350 individuals (Dunn and Nyanganji, 2011), is the largest surviving and only viable elephant population in the country; the Okomu National Park (ONP), and the Omo and Ifon (now Osse River Park) Forest Reserves (OFR) are also said to support only 33 and 28 elephants, respectively (Okekunle, 2016). The future is not bright as threats faced by these elephant populations include habitat destruction and poaching for the international ivory trade, according to J. Onoja of the Nigerian Conservation Foundation (pers. comm., 17 July 2018).

Over the centuries, elephant hunters have exterminated many elephant populations, particularly those in North Africa in the early Middle Ages, in South Africa in the eighteenth and nineteenth centuries (Douglas-Hamilton, 1979), in West Africa in the late nineteenth and early twentieth centuries, and in northern Somalia in the mid-1950s (Bourgoin, 1949). Successive reports of the Elephant Trade Information System (ETIS) for the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) document that the illegal ivory trade has risen to the highest levels in two decades following a sharp upturn in seizures of large shipments of elephant tusks in recent years (Milliken *et al.*, 2012; 2016; 2018). These reports indicate that 2011 and 2012 were the worst years on record, with "major surges" in the illegal trafficking of ivory, but some level of decline in the total weight of ivory in trade was noted in 2016 and 2017.

The movement of large-scale ivory shipments out of Africa is controlled by organised syndicates. According to Milliken (2014), it is believed that most of these syndicates currently function as Asian-run, African-based transnational operations. These criminal networks increasingly operate like global multinational businesses, connecting local resources to global markets through complex and interlinked networks, often in collusion with local business and political elites, even sometimes including those tasked with protecting wildlife (Nellemann *et al.*, 2016). Another dimension of the trade has involved the presence of unregulated domestic ivory markets in African countries that openly offer ivory products to local and foreign buyers without

government interference (Milliken *et al.*, 2012). Nigeria is no exception, with ivory openly traded in Lagos and other parts of Nigeria.

Viewed against previous surveys, contemporary ivory markets in Nigeria are reportedly holding steady, with a thriving trade in ivory items. A 1989 survey found 1,081 kg of ivory items on display in Lagos, making up 70% by weight of ivory items seen in the country; another study undertaken in 1994 estimated that there were between 500 and 700 kg of ivory items openly for retail sale in Lagos (Martin and Vigne, 2013). A third, more detailed survey of the Lagos ivory market was carried out in 1999, with an estimated weight of 1,742 kg of worked ivory for retail sale from a count of 5,966 items in 40 outlets, and 3,681 ivory items were recorded at 16 outlets at the Lekki souvenir market (Martin and Stiles, 2000). A further study in 2002 counted 5,107 ivory items weighing 1,910 kg, mostly at the Lekki market (Courouble *et al.*, 2003), and another study in 2012 found 33 retail souvenir outlets with 14,200 ivory items (Martin and Vigne, 2013). A recent study in 2015 showed that ivory trade flourishes in some parts of Lagos State, with woodwork and beadwork being used as a cover, especially in hotels where such goods are easily accessible to foreign buyers (Akeredolu *et al.*, 2016).

## METHODOLOGY

A rapid survey was undertaken between 28 and 29 September 2017 to ascertain the contemporary dimensions of the existing ivory market in Lagos. A more detailed survey was carried out in Lagos from 15 to 20 July 2018 with a focus on the Lekki market, Eko Hotel and Suites, Murtala Mohammed International Airport, Oriental Hotel Federal Palace Hotel, and Airport Hotel as a comparative assessment to previous studies.

The methods used consisted mainly of physical visits by the author—an experienced ivory market surveyor—for direct observation and formal and informal discussions with vendors and other stakeholders (wildlife and other law enforcement authorities, NGOs, etc.), with recordings and photographs used as a means of cross-checking and verifying information, especially the number and types of ivory items. The language used during the survey was English. Some covert methods were employed given that some vendors and carvers were suspicious and reluctant to divulge information about their activities, and on other occasions, a Nigerian national was engaged to facilitate information exchange with certain vendors, acting as an interpreter for those whose main language was Hausa, a language spoken by about 80% of the vendors from Nigeria and other countries of West Africa. The number of stalls, the type and quantity of ivory on sale, prices, numbers of carvers, the profiles of buyers as observed and from information provided by the vendors were recorded. In some instances, the size and weight of items were estimated from experience.

The price of the items was generally recorded as Nigerian Naira (NGN), but later converted to US dollars for standardisation (USD1=NGN360, September 2018 rate: <https://www.oanda.com/currency/converter/>).

Discussions were held with a number of government law enforcement officials, as well as personnel from the CITES Management Authority and the focal person of the National Ivory Action Plan, the National Environmental Standards and Regulations Enforcement Agency (NESREA), the Nigerian Customs Services (NCS) and the non-government organisation Nigerian Conservation Foundation (NCF).

## LEGISLATION AND LAW ENFORCEMENT

Nigeria ratified CITES in 1974. At the national level, elephants are protected under the First Schedule of *The National Wildlife Species Protection Act* (NWSPA) which was signed by the President of the Federal Republic of Nigeria on 30 December 2016. This relatively new Act provides for the conservation and management of Nigeria's wildlife and the protection of species in danger of extinction as a result of overexploitation or habitat change, as required under CITES, the Convention on the Conservation of Migratory Species of Wild Animals (CMS), and the Convention on Biological Diversity (CBD), to which Nigeria is a signatory.

Section 1(1) of the NWSPA states that “*the hunting or capture of, or trade in, the animal and plant species specified in the First Schedule to this Act (being wild animal and plant species that are endemic to Nigeria or otherwise considered to be threatened with extinction) is prohibited*”. Trade in specimens of species listed in the First Schedule may be conducted under exceptional circumstances. In Section 5(2) of the NWSPA it states that “*any person who, in contravention of the provisions of this Act, hunts, captures, possesses, trades or otherwise deals in a specimen of wild fauna and or flora without the appropriate permits shall be guilty of an offence and liable on conviction: (a) in respect of a specimen under the First Schedule, to a fine of five hundred thousand Naira (N500,000~USD1,400, at the rate of USD1.00 =NGN360, September 2018 average) or five (5) years imprisonment or both such fine and imprisonment*”.

However, enforcement of this law is lacking. Akeredolu *et al.*, (2016) states that the sale of ivory has been banned in Lagos since 2011, but corruption, a weak judicial system and light sentences undermine the effective application of this law.

The CITES Management Authority (MA) is in the Federal Ministry of Environment, Department of Forestry, and the National Environmental Standards and Regulations Enforcement Agency (NESREA) is charged with enforcement. Nosa Aigbedion, the Co-ordinator of the Lagos Office of NESREA stated that they are aware of the existing ivory markets and that there is an active ivory trade involving Chinese nationals (pers. comm., 27 September 2017). He also referred to two wildlife smuggling cases involving Chinese nationals arrested with ivory in 2014 and 2016, respectively. Some products seized by other State agencies such as the Nigerian Customs are handed over to NESREA; an example is the seizure of 71 ivory pieces (124 kg) on 22 July 2017

arriving at Lagos airport from Gabon (A. Abimbola, Cargo Department of Lagos International Airport, pers. comm., 27 September 2017).

In 2013, CITES Parties instituted a National Ivory Action Plan (NIAP) process under the direction of the Standing Committee in countries identified as being the most heavily affected by the illegal ivory trade and requiring strengthened controls to combat this trade. Parties are selected for attention from analysis of ivory seizure data held in ETIS (CITES, 2013). In Central and West Africa, Cameroon, Congo, Democratic Republic of the Congo, Gabon and Nigeria are all Category B Parties (formerly called “countries of secondary concern”) and have been requested to develop NIAPs. The implementation of NIAPs by a number of countries in Central Africa is currently under way in accordance with recommendations adopted by the CITES Standing Committee in March 2013 (Nkoke *et al.*, 2016). Nigeria is also implementing its NIAP, but its effectiveness is questionable given the open ivory market in Lagos, for example. In fact, Nigeria together with Malaysia, Mozambique and Viet Nam are now regarded as priorities for consideration under Category A (formerly called a “country of primary concern”) owing to their links to the greatest illegal ivory trade flows over the period under examination (Milliken *et al.*, 2018). Nigeria's move from a Category B country in the CoP16 and CoP17 analyses to a Category A country shows its position has worsened since the last CoP.

## RETAIL OUTLETS AND PRICES FOR WORKED IVORY

### Retail Outlets and Items

During the survey period in 2018, ivory items were observed mainly in the Lekki market (Lekki Peninsula) and in the curio market located at the Eko Hotel and Suites on Victoria Island. No items were seen in the other hotels visited or at the airport, as was also the case in Lagos during the 2012 survey (Martin and Vigne, 2013) and the 2015 survey (Akeredolu *et al.*, 2016).

Two out of 51 stalls at the Eko Hotel and Suites displayed six ivory items, four necklaces as well as two bracelets which were on sale for NGN35,000 (USD96) and NGN25,000 (USD69), respectively. One of the vendors said the market was seasonal with more items displayed during the months of December and January to coincide with holidays and the presence of tourists, mainly from Europe and Asia.

Place	No. of outlets	No. outlets with ivory	No of items
Eko Hotel/Suites curio centre	51	2	6
Lekki market	43	19	~13,752
<b>Total</b>	<b>94</b>	<b>21</b>	<b>~13,758</b>

**Table 1. No. of ivory items in the Lekki market and Eko Hotel and Suites, Lagos, Nigeria, July 2018.**



The Lekki market, by contrast, had more outlets and ivory items displayed. The market itself comprises several sections specialising in different items (clothes and footwear, food and vegetables), with the curio market (paintings, stuffed animals and other products, wood and ivory carvings) located in the centre. Of the 43 outlets selling souvenirs, 19 were selling ivory products ranging from rings to carved tusks. In total, approximately 13,752 ivory items were counted, with smaller items (<10 cm weighing <100 g) accounting for over 80% of the total. Many other items were hidden under the stalls, as indicated by the vendors and observed in some cases, and their numbers were not included in the total. The number of ivory items was therefore concentrated in fewer outlets, an average of 724 per outlet, compared to the 14,200 items spread over 33 outlets in 2013 (Martin and Vigne, 2013), giving an average of 430 items per outlet. Some outlets had fewer than 400 ivory items and others as many as 2,000 pieces. Tables 1 and 2 give a breakdown of the number of items seen in the different markets and the type of products at the Lekki market.

**Prices of Ivory Items**

Prices were generally given in Nigerian Naira (NGN) and varied according to the size of the item, the quality of carving, the nationality of the buyer (lower prices were asked of Nigerian nationals, and higher prices from foreigners, especially non-Africans), and the bargaining power of either the buyer or the vendor.

The prices ranged from as low as NGN1,000 (~USD3) for a ring to NGN540,000 (~USD1,500) for a two kilogrammes-carved tusk. Table 3 shows the buying prices of ivory items seen at the Lekki market in July 2018.

Ivory item	Approximate percentage
Necklaces	20
Bracelets	17
Pendants	15
Earrings	11
Rings	10
Chopsticks	7
Name Seals	6
Rosaries (Muslim and Christian)	5
Animal figurines	3
Human figurines	3
Whole tusks (carved and polished)	2
Others (cigarette holders, combs, etc.)	1
<b>Total</b>	<b>100</b>

**Table 2. A breakdown of the different types of ivory items in the Lekki market, Lagos, Nigeria, July 2018.**

Ivory item	Size/Description	Av. price (NGN)	Av. price (USD)
Necklace	small beads	14,000	39
	large beads	33,000	92
Bracelet	~1 cm width	12,500	35
	>1 cm width	25,000	70
Pendant	3–5 cm	25,000	70
Earring	pair	9,000	25
Ring	5–10 g	3,000	8
Cigarette holder	3–5 cm	25,000	70
Chopstick	pair	30,000	83
Name seal	round base (personal): 2x7 cm	60,000	167
	square base (business): 3x7 cm	90,000	250
Rosary	Muslim+Christian	20,000	56
Animal figurine	1–10 cm, ~200 g	83,000	230
	10–30 cm, ~700 g	160,000	445
	>30 cm, ~1 kg	215,000	600
Human figurine	1–10 cm, ~200 g	145,000	402
	10–30 cm, ~700 g	250,000	690
	>30 cm, ~1 kg	390,000	1,080
Carved tusk	<2 kg	325,000	900
	>2 kg	540,000	1,500
Polished tusk	<2 kg	252,000	700
	>2 kg	430,000	1,200
Carved tusk base	<1 kg	290,000	805
Polished tusk base	<1 kg	180,000	500
Polished tusk tip	~300 g	160,000	450
Comb	10–20 cm	18,000	50
Key holder	2–5 cm	20,000	56

**Table 3. Prices of ivory items in the Lekki ivory market, Lagos, Nigeria, September 2018.** Exchange rate: USD1=NGN360

Compared to the 2012 survey (Martin and Vigne, 2013), prices have increased over time. Some vendors used a mix of bones and wood with ivory, while others were made wholly of animal bone and sold as ivory, though in very small quantities.

#### Association of Ivory Sellers

A number of outlets had posted on their glass cabinets the by-laws of an association of ivory sellers known as the African Art Dealers' Association. Upon discussion with some vendors, it became apparent that this association, which was specific to Lagos, was created roughly ten years earlier (before the 2016 law made trading ivory explicitly illegal), but was not functional, and as of July 2018, most vendors (about 95%) were unaware of its existence nor did they adhere to the by-laws. According to one of the few vendors who knew about the association, there was a register for membership but given that adherence was not mandatory, they found no interest in being part of the association and membership had declined as a result.

Fines set out by the association for violating any article of the by-laws range from between NGN10,000 and NGN20,000 (~USD27–56)—less than the price of a pendant. Some of the articles cover the sale of fake rhino horns and other fake products, as well as the sale of ivory items by non-members. Further discussions with some NCF and NESREA personnel, and the NIAP Focal Person (CITES MA) however, showed that the association was not known within government circles. According to a CITES MA spokesperson (pers. comm., 17 September 2018), “the Association is not documented

and registered by the Federal Government therefore it does not exist ... and none of the vendors had a permit from the CITES MA or any other authority to trade in ivory items nationally or internationally”. Hence, vendors are clearly contravening Article 2, Sub-section 3 (a) of the *National Wildlife Species Protection Act* of 2016, which states that such trade is permitted only in exceptional circumstances, accompanied by valid permits. All vendors in the Lekki market are consequently operating illegally, however many of the vendors interviewed were aware of the illegality of the trade but did not seem to be concerned.

#### Carving workshops

No carving workshop was observed in the curio market of Eko Hotel and Suites. By contrast, 11 out of the 43 outlets selling souvenirs in Lekki market had carvers working mostly with wood and animal bone, and one was seen working on an ivory piece (a carving of an elephant). The outlet belonged to a Malian national and the carver was also from Mali. Two other workshops located behind the vegetable section were seen processing ivory pieces, bracelets and rosaries; the first had two carvers reportedly from Guinea; the two carvers at the second workshop were reportedly Nigerian. Not many pieces were displayed but discussions with an informant revealed that some pieces were kept in metal boxes behind the carvers. Unfortunately, it was not possible from discussions and observations to ascertain the proportion of ivory items that were carved locally and those imported from elsewhere, but it was clear that carving activities were being carried out in the Lekki market.

Recent studies in Central Africa that focused on Cameroon, Central African Republic, Congo, the Democratic Republic of the Congo and Gabon found that most worked ivory markets with ivory pieces targeting the Asian market had declined substantially (Nkoke *et al.*, 2017). However, in Lagos there is still a high degree of targeted processing of ivory destined for the Asian market, as was apparent from the quantity of chopsticks, name seals and other products for sale in the Lekki market during the present survey. This follows the same pattern seen in the 1999 study (Martin and Stiles, 2000), where declines of worked ivory targeting Asian markets were evident in other countries while a marginal rise was observed in Lagos from 1989.



Fig. 1. Principal source countries (grey) for ivory entering Nigeria.

### Profile of actors in the trade

The profile of the ivory trade actors varies across the trade chain and related activities. About 85% of vendors and other middlemen in the Lekki market were Nigerians, with a mixture of other African nationals, including individuals from Mali, Senegal and Guinea.

According to Martin and Stiles (2000), most of the buyers were Nigerian traders, but, on occasion, some Chinese railway repair workers came to buy products. During the 2018 survey, however, many buyers observed were East Asian nationals, including 13 buyers seen in the market (nine males and four females), 10 Chinese and three Japanese nationals (all females), which is a significant shift from earlier surveys. This is not a surprising development given that China is the main ivory market globally and the number of Chinese immigrants in Africa has risen sevenfold over less than two decades, with the African continent said to be home to more than 1.1 million Chinese immigrants in 2012, compared with fewer than 160,000 in 1996 (Zhou, 2017). It is believed that Chinese nationals are running ivory processing operations in Nigeria and exporting the worked products by courier to Asia. According to EIA (2017), increased enforcement effort and the high-profile arrests and prosecutions of Chinese nationals involved in ivory trafficking in one of their former sourcing areas of Tanzania, was one of the reasons for their move to Nigeria because of purported lax enforcement and corruption in that country. In an assessment of ETIS data, Nigeria ranked first amongst 25 African nations that had been identified as countries of origin or export for commercial consignments of worked ivory products moving from Africa to Asia; in total, 51 out of 214 seizures (24%) of ivory products (ca. one tonne), involved Nigeria (CITES, 2017).

Akeredolu *et al.*, (2016) reports that most of the customers encountered during the 2015 survey were Chinese nationals who came to Nigeria to buy ivory with the intention of reselling items at higher prices in other countries, in Asia in particular, where there is a ready market for ivory products. It was reported that communication between the local traders and their Chinese customers was mainly in Pidgin English, with a few of the traders speaking Chinese with their Asian customers.

In the open markets, Chinese buyers tend to prefer smaller objects, especially jewellery, name seals and chopsticks that can be easily transported back to China in their personal luggage (Martin and Vigne, 2013).

### The source and movement of raw ivory

With so few elephants found in Nigeria, given the quantity of ivory on sale and seizure information linked to Nigeria, it is highly unlikely that Nigeria itself is a viable source of raw elephant tusks. In fact, illegal exports of raw ivory from Lagos to Hong Kong were forensically examined and found to comprise ivory from Congo, Gabon, Central African Republic and Cameroon (Wasser *et al.*, 2015). The ETIS report to CITES CoP16 reported that “Nigeria was the destination for nearly one tonne of ivory seized in Cameroon in 2009 and 1.3 tonnes of ivory seized in Kenya in 2011” (Milliken *et al.*, 2012), and Nigeria continues to depend on ivory from other parts of Africa, especially neighbouring Central African countries.

According to the vendors, other sources of ivory were the Central African countries of Central African Republic, Congo, the Democratic Republic of the Congo (DRC) and Gabon, and Togo in West Africa. The MIKE (Monitoring the Illegal Killing of Elephants) report on poaching for CoP18 shows that both Central and West Africa mark another year with unsustainable levels of poaching well above the 5% mark where population decline characterises the situation in the two sub-regions that supply most of the ivory to Nigeria’s ivory trade (T. Milliken, *in litt.*, 20 February 2019).

Unadjusted prices for raw ivory in Lagos during a previous study were found to range from NGN3,200–4,800/kg (USD24–36/kg), depending on the size and quality of the piece, with USD30/kg regarded as the average benchmark price (Courouble *et al.*, 2003). In Cameroon, there has been a consistent increase in the price of raw ivory for every weight class in successive surveys, with a five-fold price increase between 2007 and 2015 for small tusks (<5 kg) ranging from between USD52–73 in 2007 and USD262–284 in 2015 in Yaounde and Douala, respectively (Nkoke *et al.*, 2017).

During the 2018 survey, a pair of raw tusks of <5 kg was found in the outlet of the aforementioned Malian. The source of the ivory was reported to be Cameroon and the going price was NGN230,000 (~USD640) per kg, a price which seems to be untypical. Apart from Cameroon, other Central African source countries were also reported in the 2012 survey (Martin and Vigne, 2013). The regional movement of ivory has not changed much during the last decades, with traffickers using the same traditional routes, roads, coastal zones and rivers, with two basic scenarios prevailing: one involves

Cameroon and Gabon, with constant movements of poached ivory across the border of northern Gabon into southern Cameroon, and then westward by road to coastal ports in Cameroon and Nigeria (Nkoke *et al.*, 2017). Some seizure information such as that reported by the Nigerian Customs, e.g. 71 ivory pieces (124 kg) arriving from Gabon and seized on 22 July 2017 at Lagos airport, confirm such routes. Another route is from north-west Congo, south-west Central African Republic (CAR) and north-east Cameroon, all going either to Yaounde or Douala or into Nigeria (D. Stiles, *in litt.*, 13 January 2019). Another highly probable source of raw tusks is leakage from government-held stocks in West and Central Africa given the poor security and management of seized ivory.

According to TRAFFIC's wildlife trade information database consulted in September 2018 and covering the period between 12 March 2017 and 1 August 2018, over 8.2 t of tusks or raw ivory pieces were seized in Nigeria or in other places with the consignments linked to Nigeria in terms of the known trade chains. Some of the places cited include Cameroon and Côte d'Ivoire in Africa, and Hong Kong SAR, Malaysia, Singapore, Thailand and Viet Nam in Asia, clearly showing Nigeria as a major exit point and a crucial link between Africa and Asia.

#### Government-held ivory stocks

Similar to the law enforcement structure in Nigeria, the management of government-held ivory stocks is an overlapping and conflicting responsibility between NESREA and the Nigerian CITES MA. According to a spokesperson from the CITES MA for Nigeria (pers. comm., 28 September 2017), NESREA has the remit to store seized wildlife products, but there are no clear links to the CITES MA and this is a source of confusion for the management of wildlife products, particularly ivory. The spokesperson went further to say that ETIS forms in Nigeria are not filled out at the point of seizure, but centrally at the federal level by NESREA. The impact of this approach on traceability and leakage is obvious, especially if one considers that ivory is also not marked, and is a breach of CITES recommendations as set out in Resolution Conf. 10.10 (Rev. CoP17).

A spokesperson from NESREA in Lagos (pers. comm., 27 September 2017) affirmed that although NESREA is responsible for wildlife law enforcement and for the collation and management of national ivory stockpiles in Nigeria, he had never heard about ETIS as an official CITES system for tracking illegal trade in ivory nor had he heard of the NIAP.

Other law enforcement agencies do transfer seized wildlife products to NESREA, but there are no clear mechanisms for doing so. For example, seizures carried out by Customs at Lagos airport were transferred to NESREA using simple "Handing-over Forms" registered at the level of the Customs but not tracked at the level of NESREA to check for consistency and to ensure that the wildlife products handed over are registered correctly. Such "Handing-over Forms" are also used by NESREA in Lagos to transfer ivory and other wildlife products to the national stockpile in Abuja.

As stated in the Nigeria NIAP Report to CITES in April 2016 (Anon, 2016), an audit of the national stockpile in Abuja was carried out in 2016 covering the period March 2010 to January 2016, and it is estimated that there were about 3,318 ivory specimens (raw tusks, semi-processed and processed ivory items), weighing about 1,173 kg being held in a government store in Abuja. The weight for all the specimens was not reported, hence the total weight reported here is not exact, but it gives a general picture of the ivory stockpile in Nigeria. According to the CITES MA for Nigeria, there has been a net increase in the quantity of ivory in the national stock given that several seizures were carried out in Nigeria in 2017 and 2018 (pers. comm., 16 September 2018) but no inventory has been undertaken to get the exact quantity.

#### CONCLUSIONS

In line with previous market surveys, the ivory market in Lagos, Nigeria, is still thriving, with the Lekki market the main sales point. This market has been operating illegally and with impunity for decades with the full knowledge of the law enforcement authorities.

This survey provides a snapshot of the estimated quantity and weight of ivory items observed when compared to the comprehensive survey of 2012 by Martin and Vigne (2013), and the level of trade is not conclusive. The fact that there is a robust market for worked ivory items, however, and considering the seizure information with links to Nigeria, and Lagos in particular, the country not only plays a role as one of the major sources of worked ivory in Africa, but is also an important hub for raw tusks from at least two African sub-regions, notably Central and West Africa, and sometimes even as far away as East Africa. The ramifications are thus far reaching, negatively impacting elephant populations in those sub-regions and by inference, in Africa as a whole. China is pointed to as one, if not the major destination for both worked ivory products and raw elephant tusks, with large-scale exports of mainly raw ivory by Lagos-based high-level operatives (mainly Chinese) and worked ivory transported from Lekki and other markets by small-scale courier traders, including via mail/courier parcels (D. Stiles, *in litt.*, 13 January 2019). It will be interesting to see how the closure of the China's domestic markets announced on the last day of December 2017 impacts the direct trade between the two countries.

Increased law enforcement pressure was cited as one of the principal reasons for the documented decline in the quantity of ivory on open display in most Central African markets (Nkoke *et al.*, 2017), the others being an increase in raw ivory prices, and a decline in elephant populations. Chinese nationals are buying up most of the tusks at prices that local carvers cannot compete with, (D. Stiles, *in litt.*, 13 January 2019). It is important for the Nigerian government to exert more law enforcement effort to discourage open trade in ivory items. It is also imperative for the Nigerian government to implement fully the CITES NIAP in order to check the illegal ivory trade in the country.

## RECOMMENDATIONS

The following recommendations are proposed to address the continued and thriving ivory market in Lagos:

- i. The Nigerian government and other stakeholders need to implement fully the provisions of the *National Wildlife Species Protection Act* of 2016, which bans and criminalises the illegal trade of elephant products in that country.
- ii. Action needs to be taken to close down the Lekki ivory market completely through a strategic approach including education targeting vendors and potential buyers from Nigeria and China through awareness campaigns, behaviour change communication and other communication strategies; scaled up and sustained law enforcement efforts; and promotion of alternatives, especially animal bone and wood for the production of artefacts. CITES Parties may wish to consider the option of introducing trade sanctions in the case of Nigeria's failure to close down its ivory market.
- iii. As a priority, efforts should be made to build the capacity of wildlife and other law enforcement authorities, amongst others, in relation to the conservation of elephants, CITES processes, law enforcement procedures, identification of products and other related tools.
- iv. Promotion at the national level in Nigeria of inter-agency co-operation, collaboration and communication, especially between the CITES MA and NESREA as well as other law enforcement agencies (Customs, police, airport/port authorities, coast guards, prosecution services, etc.), clearly defining their different roles and responsibilities and monitoring implementation.
- v. At the regional level, Nigeria and its CITES MA, as a member of ECOWAS (Economic Community of West African States) should seek collaboration both within ECOWAS and its recently agreed law enforcement action plan, and with its eastern neighbours of Central Africa, and collaborate regionally with COMIFAC (Central African Forest Commission) on their strategy to combat wildlife crime as a whole.
- vi. The Nigerian government should work more closely with key airlines known to be used in the transportation of wildlife products including ivory.
- vii. Greater collaboration with Cameroon is needed to establish joint coastguard/border patrols at land and sea points of entry to target illegal wildlife trade.
- viii. In view of the apparent key role and involvement of Chinese nationals in illegal buying and trading of ivory in and from Nigeria, the governments of Nigeria and China should consider closer bilateral collaboration to implement the agreements pertaining to illegal wildlife trade reached in Beijing in September 2018 under the Forum on China-Africa Cooperation (FOCAC) Beijing Action Plan (FOCAC, 2018). Such bilateral collaboration should include joint training of government law enforcement agencies (see TRAFFIC, 2019) as well as consider working towards a mutual legal assistance treaty (MLAT) between both countries.
- ix. Effectively implement the NIAP as requested by CITES, broadly covering legislation, prosecution, intelligence and investigation actions, co-operation at the national and international levels, law enforcement and operation actions, communication etc. In addition to the NIAP implementation, the Nigerian authorities also need to increase reporting of ivory seizure cases to ETIS for a better analysis of their law enforcement actions.
- x. Put in place an effective ivory stockpile management system according to CITES Resolution Conf. 10.10 (Rev. CoP17, <https://www.cites.org/sites/default/files/document/E-Res-10-10-R17.pdf>).
- xi. The minimum standards developed by TRAFFIC must be applied to help guide ivory stockpile management. These include information on the source of ivory, how to measure and mark each piece of ivory in the stockpile, centralisation of the ivory in a national government stockpile, security issues, and procedures for audits and periodic verification (Ringuet and Lagrot, 2013).

Forest elephant  
*Loxodonta africana cyclotis*,  
lone male in early morning mist,  
Dzanga Bai, Dzanga-Ndoki National Park,  
Central African Republic,  
one of the source countries of ivory  
reported by the vendors in  
Lekki market, Lagos.



## ACKNOWLEDGEMENTS

The author thanks the United States Agency for International Development (USAID) for providing the financial support for this survey through the Wildlife Trafficking, Response, Assessment and Priority Setting Project (Wildlife-TRAPS) and IUCN, International Union for Conservation of Nature. Special thanks to the team of the Nigerian Conservation Foundation, especially Onoja Joseph, Adedayo Memudu and Joshua Dazi for their technical, logistics and field support and to Nosa Aigbedion of NESREA, Nigeria, for his availability and valuable information. Special acknowledgement is made of the time, valuable assistance and collaboration provided by the late Ehi-Ebewele Elizabeth, of the CITES MA for Nigeria and focal person for Nigeria's NIAP, who sadly passed away on 8 February 2019. Grateful thanks to Daniel Stiles for his review of this paper and helpful comments, and to TRAFFIC staff members Steven Broad, Paulinus Ngeh, Nick Ahlers, Roland Melisch, Tom Milliken, Richard Thomas, Kim Lochen and Lauren Brown for their inputs and for enriching this report.

## REFERENCES

- Akeredolu, O.E., Babalola, F.D., Ehi-Ebewele, E.E. and Uzu, T.J. (2016). Investigation into ivory trade in selected markets and hotels in Lagos, Nigeria. *Journal of Agricultural Research and Development*. 15(2):2016.
- Anon. (2016). Progress Report on Nigeria National Ivory Action Plan (December 2016). Prepared by the Federal Ministry of Environment (Department of Forestry). Submitted to the CITES Secretariat. [https://cites.org/sites/default/files/common/prog/niaps/Nigeria\\_NIAP\\_PR\\_Post-SC69\\_posted%20on%20website.pdf](https://cites.org/sites/default/files/common/prog/niaps/Nigeria_NIAP_PR_Post-SC69_posted%20on%20website.pdf)
- Blanc, J.J., Barnes, R.F.W., Craig, G.C., Dublin, H.T., Thouless, C.R., Douglas-Hamilton, I. and Hart, J.A. (2007). *African Elephant Status Report 2007—an Update from the African Elephant Database*. Occasional Paper of the IUCN Species Survival Commission No. 3.
- Bourgoin, P. (1949). *Les principaux Animaux de Chasse de l'Afrique Noire*. Edition de Bretagne, Lorient.
- CITES (2017). *Status of Elephant Populations, Levels of Illegal Killing and the Trade in Ivory: A Report to the CITES Standing Committee*. SC69 Doc. 51.1, Annex. Sixty-ninth meeting of the Standing Committee, CITES Secretariat, Geneva, Switzerland. 31 pp.
- CITES (2013). Sixteenth meeting of the Conference of the Parties to CITES. Bangkok (Thailand), 3–14 March. Provisional agenda and working documents. <https://www.cites.org/eng/cop/16/doc/index.php>
- Courouble, M., Hurst, F. and Milliken, T. (2003). *More Ivory than Elephants: Domestic Ivory Markets in Three West African countries*. TRAFFIC, Cambridge, UK.
- Douglas-Hamilton, I. (1979). *African Elephant Trade Study, Final Report*. Laeбра 1979/005.
- Dunn, A. and Nyanganji, G. (2011). *Improving Protection for Nigeria's Largest Elephant Population in Yankari Game Reserve*. Wildlife Conservation Society. [https://elephant-conservation.org/downloads/pdf/RPT%20Final\\_IFE\\_Yankari%20Elephants\\_AF\\_FINAL%20June\\_2011.pdf](https://elephant-conservation.org/downloads/pdf/RPT%20Final_IFE_Yankari%20Elephants_AF_FINAL%20June_2011.pdf)
- EIA (2017). *The Shuidong Connection: Exposing the global hub of the illegal ivory trade*. EIA, London, UK.
- FOCAC (2018). Forum on China-Africa Cooperation Beijing Action Plan (2019–2021). Viewed at [https://focacsummit.mfa.gov.cn/eng/hyqk\\_1/t1594297.htm](https://focacsummit.mfa.gov.cn/eng/hyqk_1/t1594297.htm)
- Martin, E. and Stiles, D. (2000). *The Ivory Markets of Africa. Save the Elephants*, London, UK.
- Martin, E. and Vigne, L. (2013). Lagos, Nigeria: One of the largest retail centres for illegal ivory surveyed to date. *TRAFFIC Bulletin* 25(1):35–40.
- Milliken, T. (2014). *Illegal Trade in Ivory and Rhino Horn: an Assessment to Improve Law Enforcement Under the Wildlife-TRAPS Project*. TRAFFIC, Cambridge, UK.
- Milliken, T., Burn, R.W., Underwood, F.M. and Sangalakula, L. (2012). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: a Report to the 16th meeting of the Conference of the Parties*. CoP16 Doc. 53.2.2 (Rev. 1), CITES Secretariat, Geneva, Switzerland. 30 pp.
- 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, CITES Secretariat, Geneva, Switzerland. 29 pp.
- Milliken, T., Underwood, F.M., Burn, R.W. and Sangalakula, L. (2018). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: a Report to the 18th meeting of the Conference of the Parties to CITES*. CoP18 Doc. 69.3 Annex 1, CITES Secretariat, Geneva, Switzerland. 26 pp.
- Nellemann, C., Henriksen, R., Kreilhuber, A., Stewart, D., Kotsovou, M., Raxter, P., Mrema, E. and Barrat, S. (Eds) (2016). *The Rise of Environmental Crime—A Growing Threat to Natural Resources Peace, Development and Security*. A UNEP/INTERPOL Rapid Response Assessment. UN Environment Programme and RHIPTO Rapid Response—Norwegian Center for Global Analyses.
- Nkoke, S.C., Ngeh, C.P. and Ahlers, N. (2016). *Workshop Proceedings: Sub-Regional Action Planning to Strengthen Regional Collaboration. Support of the Implementation of National Ivory Action Plans (NIAPs) in Central Africa*. TRAFFIC. Yaounde, Cameroon. 30 pp.
- Nkoke, S.C., Lagrot, J.F., Ringuet, S. and Milliken, T. (2017). *Ivory Markets in Central Africa—Market Surveys in Cameroon, Central African Republic, Congo, Democratic Republic of the Congo and Gabon: 2007, 2009, 2014/2015*. TRAFFIC. Yaounde, Cameroon and Cambridge, UK.
- Okeunle, A.T. (2016). *Spatial Distribution and Conservation of Forest Elephants (Loxodonta africana cyclotis) in South-western Nigeria*. Rufford Small Grants Foundation.
- Ringuet, S. and Lagrot, J.F. (2013). *Développement d'un Système de Gestion des Stocks D'Ivoire au Gabon; Proposition des Standards Minimums*. Un Rapport TRAFFIC.
- Thornton, A. and Currey, D. (1991). *To Save an Elephant*. Doubleday. ISBN 0-385-40111-6
- Thouless, C.R., Dublin, H.T., Blanc, J.J., Skinner, D.P., Daniel, T.E., Taylor, R.D., Maisels, F., Frederick, H.L. and Bouche, P. (2016). *African Elephant Status Report 2016: an Update of the African Elephant Database*. Occasional Paper No. 60, IUCN/SSC, Gland, Switzerland.
- TRAFFIC (2019). TRAFFIC supports Asia-Africa Customs Workshop on improved collaboration. Viewed at: <https://www.traffic.org/news/traffic-supports-asia-africa-customs-workshop/>
- Wasser, S.K., Brown, L., Mailand, C., Mondol, S., Clark, W., Laurie, C. and Weir, B.S. (2015). Genetic assignment of large seizures of elephant ivory reveals Africa's major poaching hotspots. *Science* 349(6243):84–87.
- Zhou, S. (2017). Number of Chinese immigrants in Africa rapidly increasing. *China Daily*. [http://www.chinadaily.com.cn/world/2017-01/14/content\\_27952426.htm](http://www.chinadaily.com.cn/world/2017-01/14/content_27952426.htm)

**Sone Nkoke Christopher**, Project Officer, Wildlife TRAPS (Wildlife Trafficking, Response, Assessment and Priority Setting), Central Africa, TRAFFIC.  
E-mail: [sone.nkoke@traffic.org](mailto:sone.nkoke@traffic.org)