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OTTER ALERT

A rapid assessment of illegal trade and booming demand in Japan

Tomomi Kitade and Yui Naruse





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OVERVIEW AND

RECOMMENDATIONS

International and domestic trade in Small-clawed Otters poses serious criminal and conservation implications, alongside threats to animal welfare and local ecosystems



SMALL-CLAWED OTTER

is the species most affected by the otter trade, judged by the numbers traded in markets in Southeast Asia

THREATENED SPECIES

it is classified as Vulnerable on the IUCN Red List™, with international trade regulated by a CITES Appendix II Listing

POPULAR PETS

the Small-clawed Otter has recently gained huge popularity in Japan with people fixated on subjective qualities summed up as "adorableness" when translated from Japanese



GLOBAL SEIZURES

live otters were seized destined to Japan, between 2016 and 2017



OTTER CAFES

displaying 32 Small-clawed Otters in total were found



74

INTERNATIONAL TRADE

74 otters imported by Japan (89%) between 2000–2016 were Small-clawed Otters



SOCIAL MEDIA SUBSCRIBERS

to a popular "otter account" in Japan



There is an obvious need in Japan to support behaviour change efforts by introducing effective regulations, transforming pet trading industry practices, and engaging the various media that are currently feeding the demand

RECOMMENDATIONS SUMMARY



GOVERNMENT SECTOR

Tackle smuggling of threatened species as pets and ensure any international trade is legal and sustainable; eliminate laundering of non-native threatened species into the domestic pet trade; prevent and alleviate negative impacts of exotic pet booms.



PRIVATE SECTOR

Discourage demand and enhance positive conservation communications; eliminate laundering of smuggled animals by improving traceability.



CURRENT AND FUTURE PET OWNERS

Avoid further increasing the demand and stimulating smuggling.

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ABBREVIATIONS AND ACRONYMS

CB Captive breeding/captive-bred

CITES Convention on International Trade in Endangered Species of Wild Fauna and Flora

IUCN International Union for Conservation of NatureJAZA Japanese Associations of Zoos and Aquariums

JPY Japanese Ye

LCES Law for the Conservation of Endangered Species of Wild Fauna and Flora

MA Management Authority

METI Ministry of Economy, Trade and Industry

MEXT Ministry of Education, Culture, Sports, Science and Technology

MoE Ministry of Environment

OSG Otter Specialist Group (within the IUCN SSC)

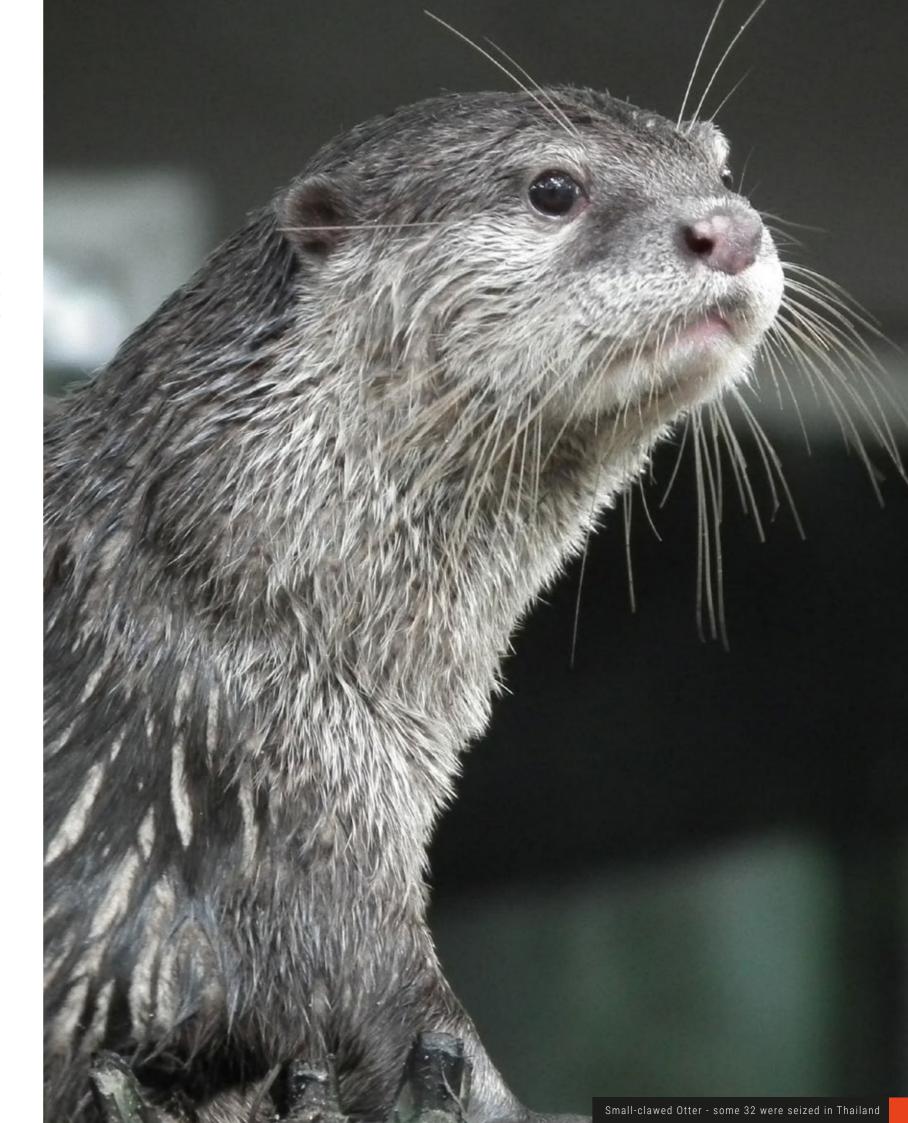
SAR Special Administrative Region

SNS Social Networking Sites

Species Survival Commission (of the IUCN)

THB Thai Baht

USD United States Dollar



EXECUTIVE SUMMARY Small-clawed Otter: the species most frequently found in illegal trade

EXECUTIVE SUMMARY

Japan has a long-standing global reputation as a major market for exotic pets where rare and threatened species from various taxa are traded, often illegally.

Recently, smuggling of the Small-clawed Otter *Aonyx cinereus* from Southeast Asia to Japan has surfaced with at least three seizures in 2017 reported in Thailand involving 32 juvenile otters. In all three cases Japanese nationals were arrested for the illegal possession and attempted smuggling (Gomez and Bouhuys, 2018). Inside Japan, there has been an unprecedented boom in demand for otters.

The popularity of otters kept at zoos and aquariums has evolved into an entertainment event called "the otter election" taking place in 2017 where the public voted online for their favorite otters



In the meantime, so called "otter cafés" where visitors can come into close contact with captive otters have started to appear in major cities (McMillan, 2018). What appears to be the most serious concern, however, is the increased visibility and popularity of pet otters on social networking sites (SNS) and the possible amplification of the demand by the mass media.

The present study was conducted as a rapid assessment to gain insights into the trade patterns of pet otters and the demand-side dynamics of the otter "boom" in Japan. To characterise both the illegal and legal international trade, data from seizures and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) imports were reviewed. A rapid survey of the domestic market was conducted by searching online advertisements and sales records (April to May 2018) and visiting physical retail outlets and otter café facilities (January to June 2018). Patterns of trade between animal dealers and domestic zoos and aquariums were also assessed by making inquiries to zoo/aquarium facilities where otters were known to be kept or bred. Rapid media analyses were conducted to characterise the otter boom using Google Trends¹, by surveying the contents posted by pet otter owners on popular SNS, and by reviewing relevant content broadcast by the mass media. Although there are many examples in various datasets where the species of otters involved are unknown, the survey identified that easily the most popular species traded as a pet in Japan is the Small-clawed Otter²; therefore, the general reference to "otters" in this report should be considered to refer to this species, unless otherwise noted.

A review of seizure records involving live otters between 2000 and 2017 revealed only seven cases with Japan as the destination, the earliest in 2007. There was a sharp increase in seizures in 2016 and 2017 when five cases involving 39 live otters (75% of the 52 otters seized in total) occurred. In all of these recent cases, Thailand was the source country. The repeated seizure incidents involving Japanese suspects and the large number of otters (10 to 12 juveniles) seized in one consignment likely indicate the presence of organised smuggling operations targeting market demand in Japan. The fact that the retail price in the Japanese market has reached over 300 times the reported black market price in Thailand (USD30/

¹ Google Trends is a public website that shows popularity of search trends in a particular country or region and related search queries. https://trends.google.com/trends/

² Species identification of juvenile otters from photographs, especially the Small-clawed Otter and the Smooth-coated Otter can be difficult, even for experts. While the species claims of sellers/owners were adopted, specialists from the IUCN SSC Otter Specialist Group were consulted for photographic identification whenever possible, and no obvious discrepancies were found.

JPY3,400 in Thailand compared to USD9,000/JPY1 million per juvenile or more in Japan) further suggests strong financial incentives underpinning attempts to smuggle live otters to Japan.

CITES trade data revealed 83 live otters as commercial imports between 2000 and 2016, of which 74 (89% of the total), as well as all of the imports since 2009, were the Small-clawed Otter. The Japanese CITES Management Authority (Ministry of the Economy, Trade and Industry or METI) preauthorised imports of 21 Small-clawed Otter in 2017 for commercial or personal uses, of which 19 were imports from Indonesia with a source code indicating "born in captivity".

These approved imports likely at least partly correspond to the start-up in 2017 of a new importer/retailer operation based in Tokyo, in which the seller claimed legitimate imports of pet otters sourced from a captive breeding (CB) facility accredited by the Indonesian government. The retailer further publicly claimed their business contributed to the conservation of threatened otters in the wild. The exact nature of the breeding operation in Indonesia remains unconfirmed. Analysis of CITES trade data also infers the possibility of otters imported to Japan from Malaysia under the purpose "Zoo" being sold into the pet trade.

A combination of online and physical surveys as well as inquiries to domestic zoos and aquariums illuminated some marked patterns of domestic trade. Firstly, a widespread lack of traceability stood out where often only vague information was given about the sources of otters put up for sale, and in at least one case a seller acknowledged the laundering of smuggled otters into the market while stating it was the animal traders' unspoken rule not to disclose their sources. In the meantime, domestic CB was most often referred to as the source of pet otters (46% or 39 out of 85 identified advertisements/sales records going back to 2011) but without clear references to the identity of the facilities or breeders supplying such captive-bred animals in Japan. It was a shared understanding amongst the sellers that the supply of domestic CB otters was rather scarce and erratic, which is likely giving rise to the current high price and fuelling the supply of cheaper smuggled otters. The other sources of otters in the identified advertisements/sales records were stated as either imports (20% or 17 cases) or unknown (34% or 29 cases).

Zoos and aquariums were also found to be a source of domestic CB otters for the pet trade. In fact, 30% (nine out of 30) of the contacted zoo/aquarium facilities admitted to having traded otters bred at their facilities to animal dealers, while 46% (23 out of 50 facilities) admitted purchasing otters from animal dealers. Finally, at least 10 otter café facilities displaying 32 Small-clawed Otters in total were identified in the major cities of Tokyo, Osaka, Kobe and Nagoya, with the first one supposedly established in 2015 and the newest one in 2018. Of the 32 otters identified, at least 22 (69%) were claimed to be born after 2017. Twenty-one of the otters were said to be domestic CB, whereas seven displayed at the aforementioned new import business facility in central Tokyo were said to be Indonesian imports.

Media analysis shed light on the appearance and amplification of the otter boom in Japan which became particularly prominent in 2017. Google Trends highlighted the steady increase in otter popularity since around 2012 and its further intensification, particularly as pets, since around 2016 where the term "price" was frequently searched with the keyword "otter". The term "café" and "election" appeared prominently in 2017, underscoring and echoing rising public interest. A review of the posting of photos and videos by private owners of pet otters on SNS identified at least 20 such animals, with the number of followers reaching over 750,000 for a popular otter. There was widespread coverage of these pet otters in the mass

media and additional commercial activities, such as publication of photo albums or calendars, and even the creation of a mascot for tourism promotion. At least 11 out of the 20 otters on SNS were reportedly born after 2017. Information regarding their source was provided only rarely and indicated they were domestic purchases (from a breeder or pet shop).

Mass media broadcast information regarding the otter boom in a positive manner, covering both entertainment events/facilities (e.g. zoos, aquariums, and otter cafés) as well as individual pet otters and their private owners. However, probably the single biggest influence was the popular TV series (Tensai Shimura Dobutsuen broadcast by Nippon TV) featuring the engagement of celebrities with Smallclawed Otters over extended periods of time (2007-2014), thus pre-dating the more recent surge in otter interest. The show likely planted the image of otters with humans (in this case, celebrities) in anthropomorphic situations, such as travelling together and raising them at home, which presumably served to give viewers the impression that otters are more suitable as pets than they really are. In fact, the survey found that viewing this particular TV show was mentioned as a reason for purchasing otters by prominent owners on SNS, along with seeing photos and videos of popular privatelyowned pet otters on other TV shows or online (SNS).

In summary, this rapid assessment of the otter trade and demand in Japan elucidated some fundamental issues regarding the market for exotic pets in general, in particular, the lack of effective regulations to prevent laundering and establish traceability. Both the lack of protection for threatened non-native species such as the Small-clawed Otter and the need for comprehensive and enforceable regulations over businesses and facilities dealing with such species need to be ameliorated with major legal reforms and potentially new legislation. There is also a need for responsibility in the sectors involved, not only in terms of direct forms of animal trade but also through their involvement in stimulating the demand leading to illegal trade—such as the conspicuous roles of otters in the mass media, influencers on SNS and certain zoos and aquariums. The current practices by these parties should be called into question given the impact of the booming demand leading to smuggling of otters from Southeast Asia. The whole situation poses serious criminal and conservation implications along with other ramifications including animal welfare issues and a potential threat of pet otters being released into local ecosystems. In light of the findings of the present study, TRAFFIC recommends the following:



83 LIVE OTTERS

were imported commercially between 2000-2016

300 TIMES

the price of Small-clawed otters on the Japanese market is 300 times higher than the price on the Thai black market

30% OF ZOOS

contacted admitted to having traded in otters bred at their facilities

RECOMMENDATIONS



TO THE GOVERNMENT SECTOR

To tackle smuggling of threatened species as pets and ensure any international trade is legal and sustainable:

- Customs and police agencies should collaborate and deploy additional resources to intercept the smuggling of threatened species as pets and crack down on smuggling operations inside Japan;
- Law enforcement efforts interdicting illegal activity should be followed up with strong judicial actions to secure prosecutions, in order for penalties to deter similar crimes and repeat offences;
- The METI should closely communicate with CITES Management Authorities in range states to ensure the legality and sustainability of operations sourcing live animals for CITES imports to Japan;

To eliminate laundering of non-native threatened species into the domestic pet trade:

- The government should consider a new legal mechanism to regulate the domestic trade in non-native species that are currently unprotected by LCES, especially CITES Appendix II species where illegal trade to Japan is known or species that are protected in their native range states (such as the Small-clawed Otter);
- The government should introduce a compulsory and enforceable traceability mechanism under the Act of Animal Protection and Welfare for threatened species (i.e. CITES-listed species) to ensure responsible trading practices by all animal handling businesses, including the management of captive breeding;

To prevent and alleviate negative impacts of exotic pet booms:

- The government should consider a new legal mechanism to define zoos, aquariums and other facilities that are eligible to acquire, display or breed threatened species and regulate relevant aspects of their practices to ensure the highest standards of animal welfare, responsible trade and communication of threatened species contents to the public by such facilities;
- The government should consider a new legal mechanism to regulate the purchase and keeping
 of non-native animals, including to prevent introduction of invasive alien species into local
 ecosystems;



TO THE PRIVATE SECTOR

To discourage demand and enhance positive conservation communications:

- Mass media companies should introduce a policy to consider carefully the impact of communicating information about threatened species, especially committing to refrain from content and messaging that may amplify the public demand for exotic pets and strive to bring about positive influence by communicating conservation issues and discouraging demand;
- SNS providers should consider a policy to discourage postings about privately owned pet species listed as threatened by the IUCN Red List for which illegal trade is known to be a problem. This would aim to prevent further amplification of demand and strive to enhance the education of SNS users and raise awareness of threatened species conservation;

To eliminate laundering of smuggled animals by improving traceability:

The pet industry, including industry associations, individual dealers, pet shops, breeders and animal cafés, should enhance compliance with existing regulations, eliminate illegal trade by establishing a verifiable system for legal acquisition and traceability, and communicate accurate information about the origin of animals and their conservation and threat status in the wild to the consumers/visitors;



TO CURRENT/ASPIRING PET KEEPERS

To avoid further increasing the demand and stimulating smuggling:

- Private keepers of otters and other exotic pets should recognise the possibility of stimulating demand and smuggling when communicating about their pets on influential media such as SNS and in the mass media;
- Aspiring keepers of otters or other exotic pets should learn about the conservation threats the respective species face, recognise the possibility that their demand could further fuel smuggling particularly given the unregulated market in Japan, and wisely refrain from purchasing.

BACKGROUND

OTTER ALERT

There are 13 extant species of otters (subfamily *Lutrinae*) occurring in both freshwater and marine habitats, ranging widely across Asia, Africa, Europe, South and North America (Table 1).

Japan is currently not known to be the range of any otter species except the Sea Otter *Enhydra lutris*, although it was once home to the Japanese Otter³ *Lutra* (*I*) *whiteleyi*, declared extinct in 2012 by the Ministry of the Environment (MoE) after the last official sighting was reported in 1979 (Ando, 2008). Recently in August 2017, a sighting of a wild otter on Tsushima Island in the Korea Strait made headlines, but was later confirmed to be an Eurasian Otter *Lutra lutra*, likely dispersed from the continent (MOE, 2018; Nikkei Shimbun, 2017)⁴. The extinction of the Japanese Otter occurred following the rapid industrialisation of the country, hunting for pelts and widespread pollution and destruction of freshwater and marine wetlands, pushing once abundant populations to dwindle past the point of no return (Ando, 2008).

Globally, seven of the 13 extant species are currently categorised as Threatened on the International Union for Conservation or Nature (IUCN) Red List of Threatened Species, hereafter called the IUCN Red List (five Endangered/EN and two Vulnerable/VU) (Table 1). While threats to otters are wide-ranging including ongoing habitat loss and human-otter conflicts, poaching and illegal trade to meet the growing demand as pets have been identified as emerging threats to otter species in Southeast Asia. Recent TRAFFIC studies have described a steady increase in seizures of live otters since 2002 and identified the most affected species—in terms of volume seized or traded in markets of Southeast Asia—to be the Small-clawed Otter Aonyx cinereus, followed by the Smooth-coated Otter Lutrogale perspicillata (Gomez and Bouhuys, 2018; Gomez et al., 2016). Both of these species are listed as Vulnerable on the IUCN Red List with their international trade regulated via an Appendix II listing in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The study revealed substantial online otter trade in the region, particularly in Thailand and Indonesia, indicating the existence of domestic pet markets. Seizure records further highlighted Japan as a key international destination for live otters, accounting for at least 32 out of 45 otters (>70%) seized in Southeast Asia in 2017. These included three seizures at Thai airports where 10 or more juvenile otters were discovered in suitcases belonging to Japanese passengers who were arrested.

>70% OF SEIZURES
made in Southeast Asia were
destined for Japan

3 SEIZURES

were made at Thai airports where 10 or more juvenile otters were discovered

³ IUCN considers the Japanese Otter to be a subspecies of the Eurasian Otter *Lutra lutra*, though the taxonomy is not completely resolved: (Waku *et al.* 2016)

⁴ The MOE confirmed via DNA analysis of faecal samples that at least three Eurasian Otters inhabit the Tsushima Island (MOE, 2018)

Otters, particularly the Small-clawed Otter, have recently gained huge popularity in Japan with people fixated on subjective qualities summed up as "adorableness" (when translated from Japanese). The surge in popularity has risen to unprecedented levels in recent years with the appearance of so-called "otter cafés" where visitors are able to touch and feed captive otters and the introduction of many marketing and public entertainment events at zoos and aquariums showcasing otters. What appears to have further grabbed the attention of the media and the public was an online "election" held in 2017 to choose a favourite otter from aquariums and zoos across the country, rather in the style of idol elections that have proven popular over the years. Another such election is set to take place again in 2018⁵. In addition to the apparent recruitment of otters to new facilities like otter cafés, increasingly more otters appear to be kept as pets by private owners as indicated by their visibility in the mass media and on social networking sites (SNS). This idiosyncratic otter boom in Japan, coupled with the recent seizure evidence in Southeast Asia implicating Japan, prompted a rapid investigation into Japan's domestic otter trade.

Aside from otters, Japan is long renowned as one of the world's largest demand centres for a wide range of exotic animals for pets, including anything from reptiles, amphibians, birds, small mammals, aquarium fishes, and insects (e.g. Hesse, 2000; Musing *et al.*, 2015; Vall-Llosera and Su, 2018; Wakao *et al.*, 2018). The market has a reputation for its long-standing issues with smuggling and unregulated domestic trade. For instance, in addition to the aforementioned three arrests in Thailand for smuggling otters in 2017, media reported at least seven Japanese nationals arrested overseas since 2017 for attempting to smuggle various live wild animals into Japan, especially reptiles (Asahi Shimbun, 2018; Farber, 2017; Inc. nc, 2017; NNA Asia, 2017; PerthNow, 2017; Sankei Shimbun, 2017c; Tangerang Online, 2018). There is also an outstanding issue of insufficient domestic trade regulations. With the Law for the Conservation of Endangered Species of Wild Fauna and Flora (LCES) only awarding protection to species imported into Japan if they are listed in CITES Appendix I, it has essentially been ineffective at deterring smuggling or allowing enforcement within Japan's borders for the majority of non-native threatened species in trade, including the Small-clawed Otter, which is a CITES Appendix II listed species (Gomez and Bouhuys, 2018; Nijman, 2014; Wakao *et al.*, 2018).

This analysis of Japan's current otter boom needs to be put into the wider context of Japan's market for exotic pets, both to frame the issue and to lever the mainstream attention needed to tackle many of the underlining systemic issues. The objectives of this study, therefore, were twofold:

- 1. **To illuminate the level and pattern of otter trade and demand in Japan** to understand how the growing market may be stimulating illegal trade in otters from Southeast Asia and to elucidate what kind of enforcement, regulatory, and market interventions are needed.
- 2. To analyse how various media, in particular the mass media and influencers on SNS, may be playing a role in amplifying the demand for otters and to consider how this analysis could inform subsequent interventions to influence the demand, including the likely use of social and behavioural change communications (SBCC) as a component of effective action to curb illegal trade.

This study additionally aimed to use the otter boom as a timely case study for the many issues relevant to Japan's market for exotic pets overall.

Species	Species Range	IUCN Red List ™	CITES App.
Small-clawed Otter Aonyx cinereus	South Asia, Southeast Asia, Taiwan and southern China	VU	II
African Clawless Otter Aonyx capensis	Sub-Saharan Africa except the Congo Basin	NT	II, I†
Congo Clawless Otter Aonyx congicus	Central Africa (the Congo Basin)	NT	II
Smooth-coated Otter Lutrogale perspicillata	South Asia, Southeast Asia, southern China and an isolated population in Iraq	VU	II
Eurasian Otter <i>Lutra Lutra</i>	Europe, Asia, northern Africa, Middle East	NT	I .
Hairy-nosed Otter <i>Lutra sumatrana</i>	Southeast Asia (Cambodia, Indonesia, Malaysia, Thailand, Viet Nam)	EN	II
North American River Otter Lontra canadensis	North America	LC	II
Southern River Otter Lontra provocax	South America (Argentina, Chile)	EN	1
Neotropical Otter Lontra longicaudis	Central America, South America	NT	T
Marine Otter Lontra felina	South America (Argentina, Chile, Peru)	EN	1
Spotted-necked Otter Hydrictis maculicollis	Sub-Saharan Africa	NT	II
Giant Otter Pteronura brasiliensis	South America	EN	I
Sea Otter Enhydra lutris	Along the North Pacific Rim	EN	II, I‡

Table 1 Summary of otter species in subfamily Lutrinae, their IUCN Red List category and CITES listing.

- * Taxonomy based on the IUCN classification rather than CITES Appendix listing. †Aonyx capensis microdon (only the populations of Cameroon and Nigeria) is listed in Appendix I. All other populations are included in Appendix II)
- ‡ Enhydra lutris nereis is listed in Appendix I.

Source: IUCN Red List (http://www.iucnredlist.org/), CITES Appendices (http://checklist.cites.org/#/en)



⁵ http://www.sunshinecity.co.jp/campaign/cp/ikimonoaz_kawauso-senkyo/

METHODS Small-clawed Otters by the river bank

METHODOLOGY

international trade

Seizure data involving Japan for the period between 2000 and 2017 were compiled from previous TRAFFIC reports on illegal otter trade in Southeast Asia (Gomez and Bouhuys, 2018; Gomez *et al.*, 2016) and annual seizure reports published by the Japan Customs. Media reports were also consulted to obtain relevant information. CITES trade data for live specimens of the subfamily Lutrinae were obtained from the UNEP-WCMC CITES trade database (https://trade.cites.org/) for the period between 2000 and 2016, and records under the purpose code Commercial (T), Zoo (Z) and Personal (P) were analysed to assess the species traded, temporal trends, and the countries of export and source codes. Importer reported data were used primarily, though significant discrepancies with exporter reported data were noted.

Japan's data for 2017 were still unavailable on the database but could be obtained through a freedom-of-information request to the Ministry of Economy, Trade and Industry (METI), or Japan's CITES Management Authority. This resulted in disclosure of export permits which METI pre-authorised for imports⁶ in 2017, with a caveat that some of the exports may not have resulted in actual imports in 2017.

domestic market survey of online advertisements

Online advertisements of live otters were surveyed in April—May 2018 using a combination of keywords such as "kawausoカワウソ (otter)" and "hanbai 販売 (sales)" in Japanese using Google Search. When an online shop or a dealer selling otters was identified, not only its new advertisements but also older records were sought to obtain their sales history. Information was sought on shops' main websites as well as other auxiliary sites such as blogs or SNS accounts. The number of otters sold, the species*, source country or origin, date of birth, age, price, and the date of the advertisement were noted whenever available. When the given information was insufficient or included notable remarks that required further clarification, shops were contacted by phone or email for further inquiry. All the ambiguous advertisements and duplications were carefully excluded to avoid inflation of numbers. Unless otherwise noted, the currency rate of JPY1 = USD 0.0090 (at 2nd July 2018) was used.

* Species identification claimed by the seller was noted. Specialists from the IUCN Species Survival Commission (SSC) Otter Specialist Group (OSG) were consulted for the verification of the species based on the photographic evidence available. However, distinguishing juveniles of Small-clawed Otter and Smooth-coated Otter from photographs is known to be especially difficult even for specialists, thus preventing accurate identification in some cases.

survey of retail outlets

A rapid physical survey of select shops and fairs was conducted between January–May 2018 to supplement the information compiled through the online survey. The survey was conducted in a covert manner whereby Japanese surveyors posed as interested customers. Surveyed shops included: two pet shops, one in Kobe and the other in Tokyo, both of which were identified in the online survey as having ongoing sales of otter pups as well as having regular sales records in the past; and two reptile fairs, one in Shizuoka and the other in Tokyo, where two shops with a history of otter sales hosted booths.

⁶ Pre-authorisation by METI is required for importing live animals that are listed in CITES Appendix II and III.



survey of otter cafés

"Otter cafés" are a new variation of "animal cafés" in Japan and refer to small facilities or cafés where visitors are allowed to touch and feed otters that are kept therein, often exhibited with other small companion or exotic animals. Animal cafés with common companion animals such as cats and rabbits first gained popularity then diversified in recent years to showcase more exotic animals including reptiles and owls. The first otter café was said to have opened in 2015, after which similar facilities spread in major cities^{7.}

To understand the recruitment of live otters for display at these facilities, the number, age and origin of otters kept at each café was examined. In addition to information available online and obtained via inquiries, nine otter cafés across Japan were visited for covert interviews by Japanese surveyors in February–June 2018. Of them, five were located in Tokyo, two in Nagoya, one in Osaka, and one in Kobe. It should be noted that while most otter cafés serve beverages, two did not (therefore, they are not strictly cafés and are referred to as "café-like" facilities). Two otter café businesses in Tokyo also conducted sales of otters via an online ordering system, and therefore none of the animals at the café facilities were for sale.

zoos and aquariums

There is no specific legal framework in Japan to define and regulate zoos, aquariums and other zoo-like facilities comprehensively where animals are kept for display purposes⁸. It is estimated that possibly around 200 so-called zoos and aquariums exist in Japan (Ministry of Education Culture Sports Science and Technology, 2015), of which 151 were registered as members of the Japanese Association of Zoos and Aquariums (JAZA, see http://www.jaza.jp) as of December 2017 (JAZA, 2018).

There are numerous other zoo-like facilities of various scales and operations where animals are kept for display purposes (sometimes alongside other purposes such as for loan or for sale), although collecting information about such facilities is a challenge. The state of the pet otter trade involving zoos and

7 McMillan (2018) in her preliminary assessment documented eight cafés including one opening in 2016 and seven opening/adding otters in 2017.

aquariums was therefore assessed using available information from such facilities. An emphasis was placed on understanding the sources of new recruitments and possible sales of newborn otters in the commercial pet trade. Information was collected from open sources as well as a JAZA publication series disclosing an annual summary of breeding results by its member facilities. Further information was sought by making direct inquiries to 55 facilities that have been identified breeding otters since 2010 and/or possible new recruitments from unclear sources (i.e. other than their own breeding stock or

media analysis

google trends search

Google Trends for the search word "kawauso カワウソ" or otter in Japanese was analysed for the period 2004 to 2018 9 to gain a glimpse into trends in otter popularity. Based on Google Search data, Google Trends enables users to see how frequently, relative to the total search-volume, specific terms are searched for in a particular period of time. Moreover, it shows what topics or keywords were searched in relation to the specific term. This provided an overview in how the term "otter" had gained in popularity generally alongside which concepts the public searched for the term.

pet otters on SNS

A survey was conducted on SNS, namely Twitter and Instagram¹⁰, to obtain information about prominent private owners of pet otters in Japan. Some owners post videos and pictures of their otters on a daily basis on their SNS accounts, usually named with their pet otters' names, to attract large numbers of followers. Information concerning birthdays and sources of the otters, the time at which owners started to keep the otters, means of acquisition as well as the reason why they purchased the otters were noted as far as possible by searching past posts, checking other publications and interviews appearing on Youtube, or by directly messaging the owners.

media content analysis

Due to the popular nature of the otter boom in Japan, a rapid review of media coverage on television (TV) was conducted to characterise how and when relevant information has been communicated, with a particular emphasis on messaging contents that might link to stimulating demand for keeping otters as pets. Information on TV coverage during the period 2012–2018 was obtained mainly from an online search database called *goo bangumi* (https://tvtopic.goo.ne.jp/), which contains titles and detailed descriptions of TV programmes broadcast on five of Japan's main national network TV stations, which was supplemented by information from other sources. Only descriptive inferences, not quantitative analysis, were possible from the identified TV programmes.

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⁸ The Act on Welfare and Management of Animals regulates "animal handling businesses" including selling, keeping, lending, training, and exhibiting [including the provision of opportunities for contact with animals]. The Museum Act does not specifically regulate zoos and aquariums either, though facilities meeting requirements are eligible to apply to register as registered museums or museum equivalent facilities.

⁹ It should be noted that Google changed its country level algorithm for Google Trends in January 2011

¹⁰ Facebook was also searched for similar accounts dedicated to posting pet otter content but none was readily identified.

RESULTS an otter reaches out to take a treat an Otter café in Japan

OUR RESULTS

international trade seizure records

The review of seizure records between 2000 and 2017 revealed at least seven seizures involving 52 live otters where Japan was (or was implicated as) the destination (Table 2). While the oldest seizure dated back to 2007, there was a sharp increase in the number of seizures in 2016–2017 when five seizures involving 39 live otters (75% of the 52 animals in total) occurred. All of these were discovered either at various Thai airports en route to Japan or upon arrival at Japan's Narita International Airport from Thailand. The Small-clawed Otter was by far the dominant species reported with at least 17 individuals, followed by five Smooth-coated Otter reportedly seized in Thailand in 2013. The species was unreported in the remainder of the cases.

The seized otters were described as juveniles in four seizures including all three (32 individuals) from 2017. Although not officially announced, otters were also known to be juveniles in at least one seizure made by Japan Customs in 2016 after photos of a seized juvenile otter subsequently appeared in their communication materials.

Year of seizure	No. of seizures	No. of otters seized in total	Country of seizure	Country of export	Month	No. of otters seized	Details (species*, seizure location, arrests, etc)
2007	1	2	Japan	Indonesia	Jun	2	Unknown
2013	1	11	Thailand	Thailand	Jan	11	6 Small-clawed Otter and 5 Smooth-coated Otter (juveniles)/ Suvarnabhumi Airport
2016	5 2 7 Japan		lanan	Thailand	Feb	2	Small-clawed Otter/ Narita Airport
2010	Z	/	Japan	Thailand	Dec	5	Small-clawed Otter/ Narita Airport
2017 3 32		Thailand	Thailand	Feb	12	4 Small-clawed Otter, others unknown (juveniles)/ Don Mueang Airport/ Japanese man arrested	
	32			Jun	10	Species unknown (juveniles)/ Suvarnabhumi Airport/ Japanese man arrested	
					Oct	10	Species unknown (juveniles)/ Don Mueang Airport/ Japanese woman detained

Table 2

Seizure records of live otters involving Japan as the destination

Sources: TRAFFIC (Gomez and Bouhuys, 2018, 2017; Gomez et al., 2016), Japan Customs and various media reports in Japanese media (Newsclip, 2017, 2013; Sankei Shimbun, 2017a, b)

^{*}Species claimed in the cited sources were used.

In the three incidents that occurred in Thailand in 2017, it was Japanese nationals who were arrested for the illegal possession of the otters, one of whom was a female university student while the others were males in their 40s and 50s. The relatively large number of otters seized in each case (10 to 12 animals) also suggests organised smuggling for resale purposes.

According to media reports, the suspects all claimed to have purchased the otters at a weekend market (most likely Chatuchak market) in Bangkok (Newsclip, 2017; Sankei Shimbun, 2017a, b). Sale or possession of otters are prohibited under Thai law. While market monitoring of Chatuchak over the years (2015–2017) has not revealed otters being sold openly (TRAFFIC unpublished data), the market is a known hotspot for illegal wildlife trade (Chng and Eaton, 2016; Shepherd and Nijman, 2008) and therefore reports of a black market trade in otters there is not surprising. In one of the reported incidents in 2017, the price of the purchased otters was claimed to be about THB1,000 or USD30/JPY3,400 per juvenile (THB1 = USD0.0301/JPY3.3675 as at 1st August 2018) (Sankei Shimbun, 2017a).

CITES imports

Japan imported 83 live otters as commercial imports (CITES purpose code: Commercial or T) between 2000 and 2016, of which the Small-clawed Otter dominated (74 individuals or 89%) (Figure 1). The majority of the Small-clawed Otter imports occurred after 2009, although the reason for the peak in 2009 is unknown (Figure 2). Up to 2015, countries exporting the Small-clawed Otter for trade were European Union Member States, namely the Netherlands, Belgium and the Czech Republic. Commercial imports from Indonesia first appeared in 2016 with four individuals. Oddly, the supposedly corresponding Indonesian records indicated their purposes as Personal (purpose code: P) instead of Commercial as reported by Japan (Table 3). All the commercial Small-clawed Otter imports up to 2016 were reportedly bred in captivity (source code: C).

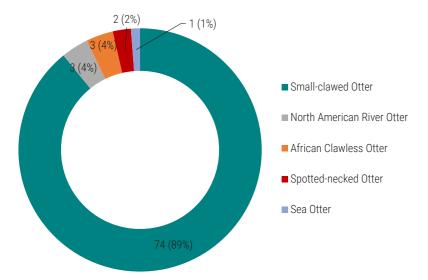


Figure 1

Japan's CITES imports of live otters by species (subfamily Lutrinae) for 2000–2016 under the purpose Commercial (code: T) (N=83).

Importer reported quantity was used. Source: UNEP-WCMC CITES trade database.

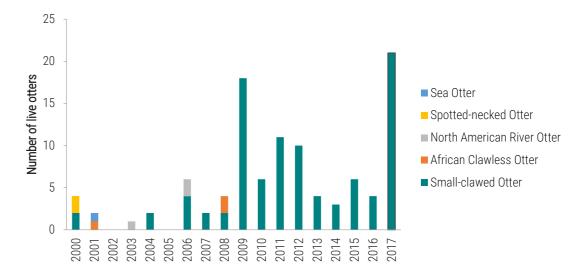


Figure 2

Japan's annual CITES imports of otter species (subfamily Lutrinae) for 2000–2016 under the purpose Commercial (code: T).

Importer reported quantity was used (N=83).

A tentative number (N=21) was included for 2017 based on METI's pre-authorisation of export permits, though this may not correspond to actual imports. The 2017 data include four individuals with purpose "personal". Source: UNEP-WCMC CITES trade database (2002-2016) and the Ministry of Economy, Trade and Industry (for 2017).

In addition to these records up to 2016, METI approved imports of 21 Small-clawed Otter in 2017 that are either for Commercial or Personal uses (Figure 2). All but two captive-bred individuals for Commercial purposes from the Netherlands (originating in Germany) were exports from Indonesia. Unlike the previous year, the source code of all 19 individuals from Indonesia in 2017 was labeled as 'born in captivity' (source code: F) referring to animals that do not fulfill the definition of 'bred in captivity'¹¹. Fifteen of these were under the purpose Commercial while the other four were Personal.

Apart from the Small-clawed Otter, Japan imported for Commercial purposes three wild North American River Otter from Canada, three wild African Clawless Otter from South Africa, two wild Spotted-necked Otter from South Africa, and one captive bred Sea Otter from South Korea, all before 2009 (Figure 2). It was noted that exporter records for two of the wild-sourced African Clawless Otter from South Africa in 2008 specified purpose Zoo instead of Commercial as reported by Japan (Table 3). There were also two other cases where Japan's records did not match those of exporters, both involving the Small-clawed Otter where import quantities were larger than reported by exporting countries (Table 3).

¹¹ Definition of specimens of animal species "bred in captivity" is provided in CITES Resolution Conf. 10.16 (Rev*)



Year	App.	Species	Importer	Exporter	Origin	Importer reported quantity	Exporter reported quantity	Purpose	Source
2008	II	Aonyx capensis	JP	ZA		2		T	W
2008	II	Aonyx capensis	JP	ZA			2	Z	W
2009	II	Aonyx cinereus	JP	BE	DE	4	2	Т	С
2012	II	Aonyx cinereus	JP	CZ	DE	5	3	T	С
2016	II	Aonyx cinereus	JP	ID			4	Р	С
2016	II	Aonyx cinereus	JP	ID		4		Т	С

Table 3

List of CITES import records of otter species (subfamily Lutrinae) by Japan where discrepancies with accompanying exporter records were found on CITES Trade Database.(2000–2016)

Source: UNEP-WCMC CITES Trade Database

Country codes: BE = Belgium, CZ = Czech Republic, DE = Germany, ID = Indonesia, JP = Japan, ZA = South Africa

Purpose codes: T = Commercial, P = Personal, Z = Zoo

Source codes: W =Specimens taken from the wild, C =Animals bred in captivity in accordance with Resolution Conf. 10.16 (Rev.), as well as parts and derivatives thereof, exported under the provisions of Article VII, paragraph 5, of the Convention.

Imports for zoos were also reviewed partly because of the known trading practices between zoos and private animal dealers in Japan. Between 2000 and 2016, 43 live otters were imported into Japan under the purpose Zoo, which included the Small-clawed Otter, the Eurasian Otter, the North American River Otter, the African Clawless Otter and the Smooth-coated Otter (Figures 3&4). There was a visible spike in the number of imports, especially the Small-clawed Otter in 2010 (Figure 3). Exporters of the Small-clawed Otter were Asian countries/territories, led by Malaysia contributing 12 individuals, Singapore and South Korea contributing two each, and Sri Lanka and Hong Kong SAR, contributing one individual each.

Of these, all but eight individuals imported from Malaysia in 2008 and 2010 were claimed to be captive bred. Japan imported other otters of wild origin—eight North American River Otter from Canada and four African Clawless Otter from South Africa. In addition, in 2017 METI authorised an import of one captive-bred Small-clawed Otter from France under the purpose Zoo.

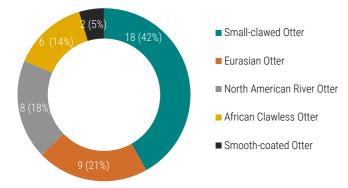


Figure 3

Japan's CITES imports of live otters by species (subfamily Lutrinae) for 2000–2016 under the purpose Zoo (code: Z). Importer reported quantity was used (N=43).

Source: UNEP-WCMC CITES trade database.

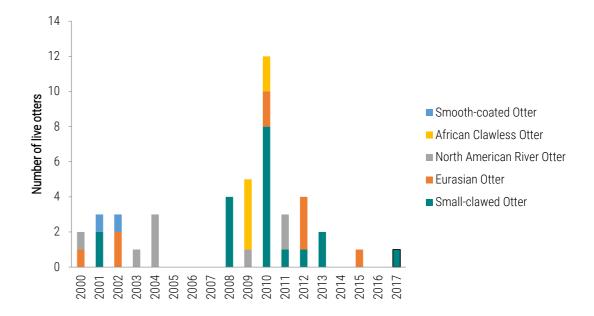


Figure 4

Japan's annual CITES imports of otter species (subfamily Lutrinae) for 2000–2016 under the purpose Zoo (code: Z). Importer reported quantity was used (N=43).

A tentative number (N=1) was included for 2017 based on METI's pre-authorisation of export permits, though this may not correspond to actual imports. Source: UNEP-WCMC CITES trade database (2002–2016) and the Ministry of Economy, Trade and Industry (for 2017).

domestic market sellers of otters

The online searches identified at least 13 sellers advertising or have advertised and/or sold live otters in the past. Their types of business operations encompassed exotic animal trading including importing, breeding, retailing, and running of otter café-like¹² facilities. At least five of the sellers had otters available for sale at the time of the survey (April–May 2018) totaling at least eight otters which were all juveniles (seven were advertised online while the other one was only revealed upon making a private inquiry). In addition, three other sellers including the two businesses running otter café-like facilities invited customers to make reservations on their website, although the actual availability of otters at the time was unrevealed.

Online advertisements by individual sellers were not identified in this study although closed platforms like those on SNS were not surveyed. In terms of sales outlets, at least one of the sellers was found to have sold otters at major reptile fairs; in January 2018, surveyors observed three newborn otters (two already reserved) and one adult pair for sale at one of Japan's largest reptile fairs held in Shizuoka. It should be noted that a Japanese law¹³ requires a face-to-face provision of information for selling live mammals, birds and reptiles even when advertisements or ordering are placed online.

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¹² The facilities are essentially the same as otter cafés where visitors pay to come into contact with otters, except these ones do not serve beverages, therefore, are not strictly cafés.

¹³ Act on Welfare and Management of Animals



sales and advertisements of otters

Based on the information collected from relevant websites and direct inquiries including ones during covert interviews, it was found that a minimum of 85 otters had been put on sale by 12 out of the 13 identified sellers¹⁴ since 2011, including the eight otters that were available at the time of the survey. Seventy-six of the records were from 2016 onwards. At least 30 were clearly stated as sold, although the remainder are equally likely to have been sold. These records are probably only a fraction of the actual number of otters traded in Japan during this period, as only limited information could be accessed online and by the rapid physical survey. In particular, information on business-to-business trade amongst dealers and breeders is inaccessible, and it is likely that some otters are never advertised individually because sales are either pre-ordered or happen so quickly once they become available.

While the true extent of otter sales is unknown, information obtained from collected records revealed some characteristics of the otter trade. Firstly, otters for sale appeared to be usually juveniles under several months old. Although online advertisements for otters between two to three years old were observed, sellers often advised that it was best to raise otters from babies so that they got accustomed to their owners and the environment. Secondly, species were identified by the sellers for 74 out of 85 otters or 87%, in all of which cases the species claimed was the Smallclawed Otter. There were challenges in confirming the species involved due both to the quality of photos available and the fact that identification of juveniles, especially those of the Small-clawed Otter and Smooth-coated Otter, is difficult. However, IUCN SSC OSG specialists consulted by TRAFFIC confirmed that none of the photos collected during the survey contained recognisable images of otters other than Small-clawed Otters.

The specific price of an otter was only indicated in 11 cases, ranging from JPY800,000 (USD7,200) to JPY1,620,000 (USD14,580). Two sellers visited during the physical survey said that prices had increased significantly; one indicating it had almost doubled in the past five years; another recalling that decades ago otters could be purchased for around JPY200,000 (USD1,800). Some sellers said

that prices between dealers were cheaper, especially for smuggled otters and that the price of newborn otters sold from zoos and aquariums also tended to be much less than the retail price in the market. According to information obtained by PEACE (Put an End to Animal Cruelty and Exploitation), a domestic NGO in Japan, through a freedom-of-information act, the trade price of a Small-clawed Otter from a public zoo to a dealer in 2016 was JPY250,000 (USD2,250) per animal, substantially cheaper than the retail price in the pet market (PEACE, *in litt.*, June 2018).



¹⁴ One of the 13 sellers advertised to sell otters at the time of the survey but no specific records of sales or individual advertisements were retrieved for this seller. The seller was a business running an otter café-like facility.

source of otters

Of the minimum of 85 otters for which either advertisements and/or sales records were identified, 46% (39 otters) were claimed to be captive bred (CB), 20% (17 otters) were reportedly imported, and the source was not revealed for the rest (34% or 29 otters) (Figure 5). Only vague information was provided about the domestic CB sources, except for one seller who claimed to have sold juvenile otters obtained from their own breeding pair (though the quantity was never revealed). Other information regarding domestic CB sources included rough geographical locations of breeders from whom newborn otters were purchased, namely, Nagano, Hyogo, Okayama, and Chiba prefectures. A domestic zoo was mentioned by one seller as the origin of three otters.

In general, explanations provided by shop staff about the sources of otters during the physical survey were also vague or sometimes inconsistent with their advertisements. However, many mentioned the supply of domestic CB otters to be erratic due to difficulties in breeding otters, resulting in long waiting periods and high prices. One staff member acknowledged the possibility of smuggled otters entering the domestic trade and the difficulty of discerning such animals from genuinely domestic CB animals when sourcing from dealers. Another staff member confessed that smuggled otters enter the market for cheaper prices, but often they die quite soon due to organ damage caused by drugs forced down them to keep them quiet during smuggling operations. The same staff member also claimed it was the animal traders' unspoken rule not to disclose the sources of animals. Furthermore, a staff member also made remarks suggesting that sometimes excess otter pups born at aquariums and zoos were sold to commercial dealers at a discount price, sometimes unreported.

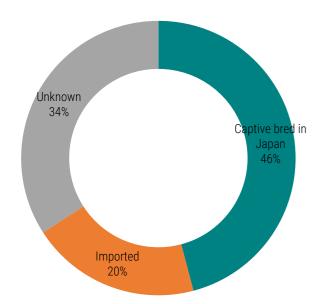


Figure 5
Claimed sources of otters offered for sale in Japan between 2011–2018 May (N=85).

In terms of imports, two otters advertised in April 2014 were claimed to have come from a Malaysian zoo. The only potentially corresponding CITES import records found were the two Small-clawed Otters imported from Malaysia in 2013, but the purpose of this trade was recorded as Zoo instead of Commercial. "EU CB" was mentioned by one seller as the source of at least four otters (two pairs) in a blog posted in October 2016.

This might correspond to CITES imports of the Small-clawed Otter from European Union Member States; the latest such records were from 2015 for six otters imported from the Czech Republic.

The source of at least 11 otters advertised/sold was claimed to be imports from Indonesia, one in 2016 by one seller and at least 10 reportedly sold in 2017–2018 by another seller. The latter started business in 2017 specialising in retailing newborn Small-clawed Otter imported from Indonesia, while also opening

an otter café-like facility in Tokyo where otters (also imported from Indonesia) had been displayed since June 2017. The shop took online orders and did not advertise individual otters, making it difficult to assess accurately how many had been sold. However, the shop owner told a surveyor in June 2018 that they had already sold 10 otters, not only to individual customers but also to (an) aquarium(s)/zoo(s) and that 10 more were arriving the same month. Earlier the surveyor obtained information from a shop staff member that 10 juveniles were imported in May 2018. Also taking into account that they display seven otters in their own facility (the oldest one imported in June 2017), the number of otters imported by this business between 2017 and June 2018 from Indonesia tallies up to at least 27 otters, though there were possibly more. The UNEP-WCMC CITES trade database records imports of four Small-clawed Otter from Indonesia in 2016 and 19 in 2017, while the updated records for 2018 are yet to be obtained.

Operation of this particular business is of interest regarding so-called captive-breeding practices in Indonesia. The business states they source their otters from the only government-accredited breeding facility in Indonesia which the business owner himself has worked to establish. However, information provided by the shop staff implied the facility was more like a ranching operation whereby newborn otter were taken from wild or from ranched parents. Interestingly, the CITES source code of all Indonesian imports in 2017 was born in captivity (F) rather than bred in captivity (C), suggesting that the otters did not meet the requirements of captive breeding defined by CITES. Unfortunately TRAFFIC has asked but not yet obtained any confirmation from the Indonesian government about the existence of an officially registered facility (Gomez and Bouhuys, 2018). It is also interesting to note that the business openly claims their operation started out of concerns for the conservation of otters in the wild and that part of their proceeds are donated to support the facility in Indonesia, through which the customers can contribute to the conservation of otters¹⁵. Although the exact logic behind these claims is uncertain, the shop staff and the owner explained to the surveyors that their operation was helping to conserve otters in the wild because excess newborns would otherwise not be able to survive; this seems contradictory to claims that the operation was sourcing only captive bred individuals.

¹⁵ https://www.zakzak.co.jp/eco/news/171219/prl1712190005-n1.html



otter cafés

At least 10 animal café and café-like facilities displaying otters were identified across Japan during the survey period, all of which were established after 2015 (Figure 6 left). Five facilities opened since 2017 with the newest opening in May 2018. In total, there were at least 32 otters on display across the 10 facilities, all of which were claimed to be the Small-clawed Otter. The number of otters per facility ranged from one to seven. Notably, at least 22 (69%) were young individuals born after 2017, according to information provided by the businesses (Figure 6 right). Regarding the sources of displayed otters, seven out of the 28 otters found at the aforementioned retailer's café-like facility in Tokyo were from Indonesia, claimed to be CB, while the source of the remaining 21 individuals was said to be domestic CB. However, the exact sources were never traceable from the information provided by the staff, similar to the situations encountered when interviewing the sellers of otters.

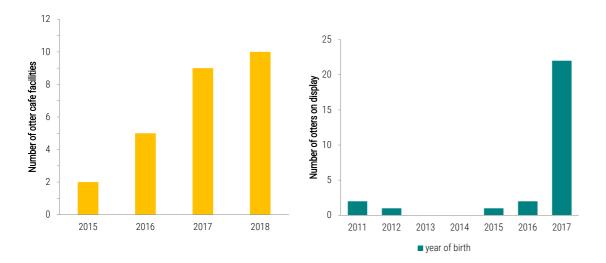
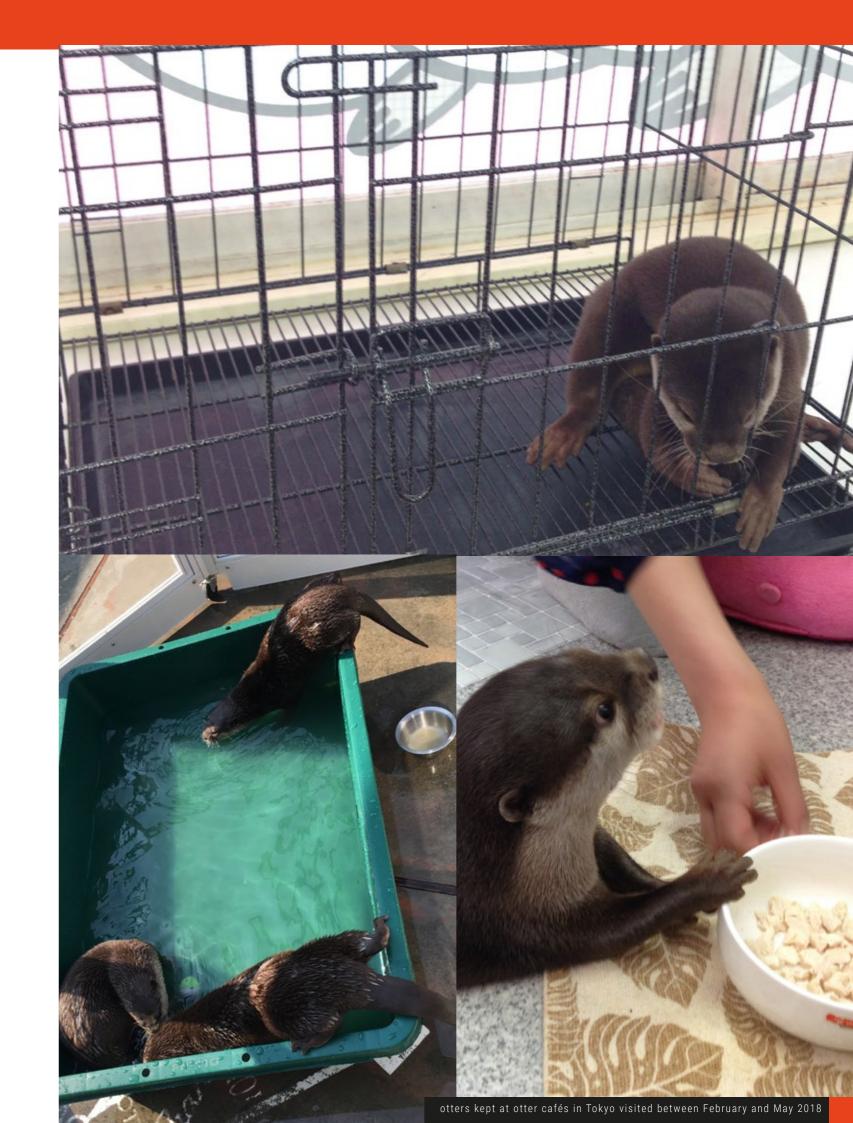


Figure 6
Left: Number of otter café facilities identified in Japan;
Right: the number and year of births of otters at café facilities observed during February-June 2018 (N=28).

The operational system for the cafés varied between facilities but one session was usually an hour or half an hour costing around JPY1,200–2,900 (USD11–26) per hour with options for feeding otters. The feed was usually prepared pet food but some facilities fed seaweed or fish. In most cases otters were kept in small cages or individual display cases, although a few facilities kept them in a small enclosure with other otters. Although surveys took place mostly during weekdays, there were always other customers.

Young couples and female groups were most frequently encountered but foreign visitors were also observed. In all cases, when asked, shop staff provided tips for keeping otters at home as pets, although such information was sometimes found to be inconsistent. Despite placing an emphasis on otters' adorableness, most facilities were quite open about the safety issues associated with coming into contact with otters and certain difficulties in keeping them as pets. Comments to discourage keeping otters as pets were heard from only one staff member among all the facilities visited.



zoos and agauriums

Out of 50 facilities which responded to inquiries (comprising 45 JAZA and five non-JAZA facilities), 21 (42%) indicated the source of their otters to be from their own breeding stock or direct transfer from other domestic zoos/aquariums (Figure 7); these included four facilities that have also adopted otters from seizure incidents. Six others (12%) claimed direct imports, and the remaining 23 facilities (46%) mentioned the use of animal dealers as intermediaries for sourcing otters. At least six facilities stated to have made such transactions with animal dealers within the past five years. Amongst those who indicated animal dealers as their immediate source, 15 (30%) specified imports as the original source (of which two (4%) indicated domestic sources in addition to imports) with five specifying foreign zoos/aquariums (two each in Germany and Czech Republic, one in Canada), eight mentioning only the names of the source countries, and two not mentioning the source countries at all. In seven other cases the original sources were not mentioned, while three indicated domestic sources including another zoo, a former pet and a form of lease offered by the animal dealer (Figure 7).

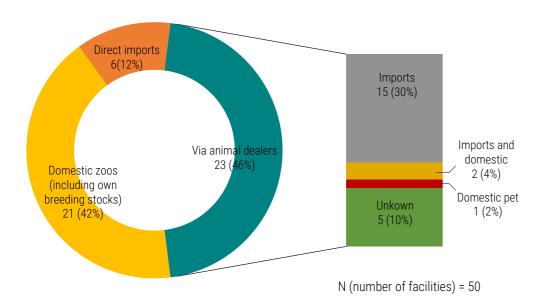


Figure 7
Responses by Japanese zoos and aquairums to inquiries about the sources of otters (Number of facilities, N = 50).

Of the 30 contacted facilities with experience in breeding otters (comprising 28 JAZA and two non-JAZA facilities), nine (30%) acknowledged experience of trading newborns to animal dealers (Figure 8). The remaining 21 stated that newborns were either kept at their own facilities or traded only to other domestic zoos/aquariums. However, of these facilities, one admitted that two otters they traded to another zoo facility had ended up in the market, likely as a result of subsequent or intermediary commercial trade via an animal dealer. Including this case, a total of at least 13 individual otters (at least 10 between 2011 and 2016) all of which were Small-clawed Otter, were traded to animal dealers at one point. Of the nine facilities which declared to have traded newborn otters to animal dealers, only one specified it was an intermediary transaction for transferring to another zoo/aquarium facility, while two appeared vaguely cognisant that otters were potentially traded to other zoos (domestic and overseas) by the dealer.

While only one facility expressed their knowledge of otters being traded into the pet market, this is known to have occurred from at least two of the facilities included here, as revealed by separate investigations by PEACE conducted in 2016, where sales of otters obtained from two JAZA-member zoos were identified in online advertisements from an exotic pet shop (PEACE, 2016). Furthermore, TRAFFIC staff encountered two adult Small-clawed Otters during a visit to a reptile fair in Tokyo held in August 2018, which the seller claimed to be previously sourced from a JAZA-member aquarium (R.Nishino and Y. Naruse, pers. obs., August 2018).

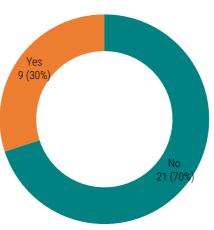


Figure 8
Experience of trading newborn otters to animal dealers

Responses by Japanese zoos and aquairums to inquiries about the experience of trading newborn otters to animal dealers (Number of facilities, N = 30).

Small-clawed Otters kept at JAZA member facilities have been managed through a pedigree registration scheme since 1995 whereby each animal must be registered with JAZA (JAZA *in. litt.*, August 2018). While transfer of animals between member facilities is carefully managed through the scheme, JAZA does not prohibit its members from trading animals with non-member parties, including commercial trade with animal dealers. Although this also applies to otters, JAZA, in response to the aforementioned exposure of otters leaking from its member zoos into the pet trade, reportedly sent out a notification in 2016 to all its members recommending them not to sell animals including otters for commercial trade (JAZA *in. litt.*, August 2018).

media analysis Google Trends

The Google Trend of the search term "otter" in Japanese showed a steady increase since 2012 with a visible spike in 2017 onwards (Figure 9). There was a clear peak around August 2017, most likely reflecting the news reporting the sighting of a wild otter on Tsushima Island off western Japan, which made the headline for the possibility of it being the extinct Japanese River Otter *Lutra* (*I*) *nippon* (Nikkei Shimbun, 2017). The top five most popular related queries identified by Google Trends were "pet", appearing every year since 2012, "price" appearing from 2016 onwards, likely indicating more people were actually seeking information with potential purchase in mind, "café" appearing from 2017 onwards,

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coinciding with the timing of increase in otter café facilities in Japan and in 2017 "election", which refers to an online voting event organised to elect a favourite otter from aquariums and zoos across Japan.

Picking up in 2018 was Sakura, the name of a famous, privately owned pet otter whose owner uploaded photos of it daily on a popular blog and SNS. Overall, pet-related search terms progressively increased since 2016, likely accounting for the general rise in the popularity of the search term "otter" in recent years.

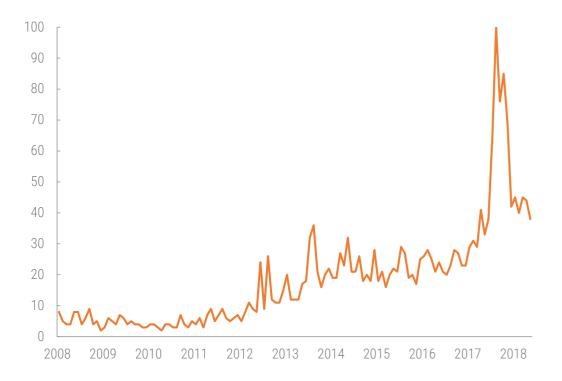


Figure 9 Google Trends for the term "otter (カワウソ)" in Japanese retrieved in May 2018. Google Trends shows the relative popularity of the search term by setting the highest point to 100.

pet otters on SNS

At least 20 otters kept by private owners were observed on the surveyed SNS (Twitter and Instagram) during May 2018. Each otter or sometimes multiple otters kept by the same owners was represented by a dedicated SNS account through which the owners shared their daily life with photos. The number of followers exceeded 100,000 in four of them, with a maximum of 754,599 accounts following a popular otter named Chitan. The aforementioned individual Sakura had more than 100,000 subscribers on YouTube and the number of total views for its updated videos exceeds 40 million. Responses of the followers largely appeared to echo the owners' affection for their pet otters, often commending their adorableness and expressing a desire to own pet otters themselves. Furthermore, the popularity of these pet otters on SNS appears to be amplified through extra commercial activities appealing to the public.

For example, Chitan was made into an anthropomorphic mascot character by the Akihabara¹⁶ Tourism Promotion Association and appointed as the Tourism Ambassador for the Kochi prefecture in 2017¹⁷, appearing at various public events as a mascot. Photo albums and calendars have also been published and are available online for Chitan and other popular pet otters.

In terms of the species, all but three (species unknown) pet otters were claimed by the owners to be the Small-clawed Otter. The year of birth was given for 17 otters, of which 11 (65%) were claimed to be born in 2017 or 2018 (Figure 10). Information regarding the source or means of acquisition was provided only sparsely: one reportedly came from Okayama prefecture (potentially purchased from a domestic breeder or a dealer there), while three were reportedly purchased at pet shops.

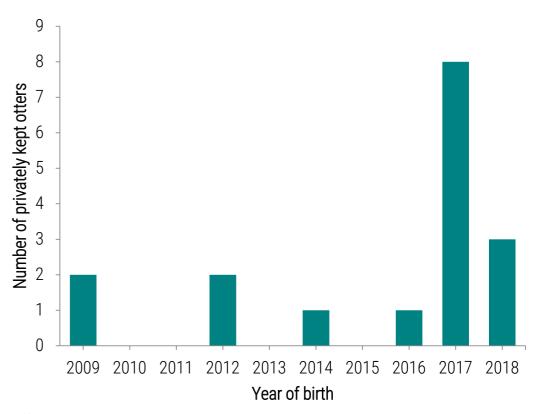


Figure 10

The number and year of birth of privately kept otters on SNS (N=17). Year of birth could not be obtained for three of the 20 otters identified

What motivated the owners to purchase otters as pets was retreived from seven owners by seaching the contents of their posts or directly making inquries (Table 4). Four owners stated they were inspired by particular TV programmes, two of which specifically reffered to the same programme, "Tensai Shimura Dobutsuen (天才! 志村どうぶつ園)"¹⁸, a long running popular series featuring celebrities travelling with or raising baby otters, while another specifed a show called "Ikimononi Thank You!" which featured a pet otter popular on SNS. Seeing otters at aquariums/zoos and pet shops were mentioned by two owners each. Other reasons mentioned, each by one owner, were online contents of pet otters (YouTube videos and a blog) and a comic book character.

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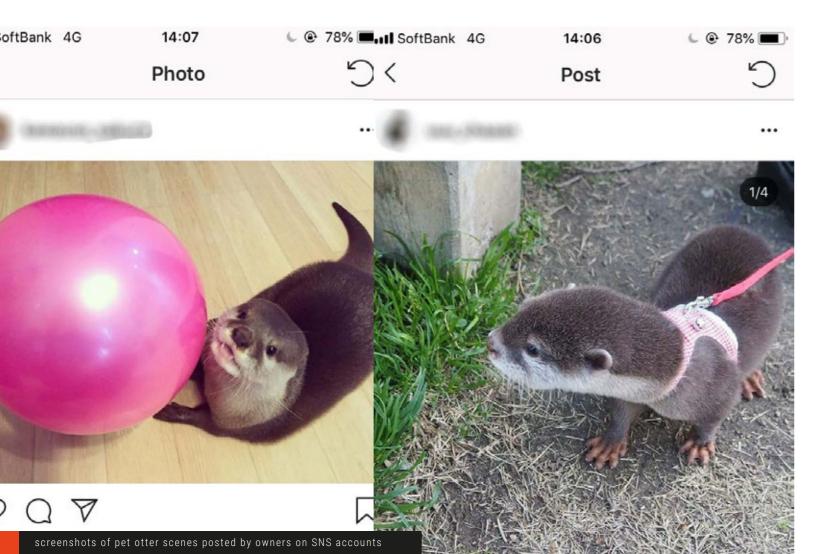
¹⁶ Akihabara is an area in Tokyo

¹⁷ https://chiitan.love/

¹⁸ http://www.ntv.co.jp/zoo/

Owner on	# of pet otters	Year of birth	What motivated owners to purchase				ase		
SNS	out.	onero		TV	Zoos, aquariums	Online content	Pet shop	Comic books	Notes
A	1	2009	√	√		✓		Owner specified seeing "Tensai Shimura Dobutsuen"	
В	2	2009, 2012				✓			
С	1	2016	√					Owner specified seeing "Ikimononi Thank You!" featuring a pet otter on SNS	
D	1	2017					✓		
E	1	2017	√					Owner specified seeing "Tensai Shimura Dobutsuen"	
F	3	2017		✓					
G	1	2018	√		✓			Owner referred to seeing popular pet otters on Youtube and a blog	
TOTAL									
7	10	n/a	4	2	1	2	1	n/a	

Table 4
Motivation for purchase expressed by pet otter owners on SNS (Twitter and Instagram)





mass media

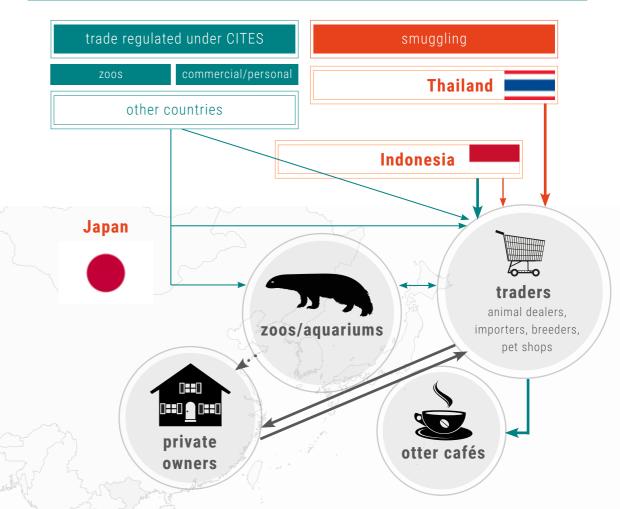
The review of TV contents depicted how various national network TV stations broadcast images of otters as pets by featuring the homes of private otter owners, famous pet otters on SNS and their videos, as well as certain exotic pet shops offering to sell otters. Otters were featured not only in animal or pet-related TV programmes but also in general news programmes and variety shows, particularly since 2017. The contents usually conveyed the cuteness of their looks and sometimes practical information about their cost and how to take care of them at home. In terms of general popularity, news about otter cafés and the otter election were broadcast in 2017.

However, what stood out most in terms of potentially mainstreaming otters as pets was the aforementioned two long running series of the popular animal TV programme ("Tensai Shimura Dobutsuen") broadcast by Nippon TV between 2007 and 2014. Cited as inspiration by two of the SNS otter owners, these TV series featured celebrities travelling with and raising baby otters over an extended period of time, conveying their charms and affinities to humans with a sense of comedy, particularly by anthromorphising the animals. Another TV show cited as the inspiration for purchasing by another owner on SNS (owner of Sakura) was a seris called "Ikimononi Thank You" broadcast by TBS. While the series featured animal-related content from a wide variety of taxa, the specific session referred to by Sakura's owner was from 2016 featuring the home of another private otter owner. The show later featured Sakura in 2017, further framing the image of otters as pets.

In 2018, the owner of the new Indonesian Small-clawed Otter retailing business also appeared on a popular, nationally broadcast variety show in July 2018 along with the otters kept at his facility in Tokyo. Altough quantitatively assessing the impact of such content on demand for otters requires more elaborate research, results of these quick overviews indicate the possible roles of the mass media in amplifying awareness and popularity of this trend as well as the perception that otters can be kept as pets.

DISCUSSION a Small-clawed Otter in captivity

FURTHER DISCUSSION



Schematic of identified trade routes for otters, both legal and illegal. Dotted arrows indicate possible trade routes that could be construed from available information but without confirmed specific incidents linking two entities.

trade patterns and issues

smuggling and laundering

The domestic trade of otters in Japan is undermined by the lack of traceability and the entering of smuggled otters into the trade chain. As far as is evident from recent seizures, juvenile otters are sourced from Thailand and carried by "mules" who smuggle them into Japan for resale. Repeated seizures and arrests indicate strong incentives where large profits can be made by successfully smuggling otters into Japan's market. In fact, the difference between the black market price in Thailand and the retail price in Japan could be as much as 300 times or more (e.g. ~ JPY3,400 or USD30 to over JPY1 million or USD9,000). In terms of origins of smuggled otters, apart from Thailand there was one incident of attempted smuggling from Indonesia seized by Japan Customs in 2007.

While there has not been any seizure indicating Indonesia to Japan movement since then, the country, along with Thailand, was recently found to have an active local market for pet otters especially via online trading (Gomez and Bouhuys, 2018), suggesting it may also be at high risk of exploitation by Japanese smuggling operations. In fact, TRAFFIC's market survey discovered the average price of otters sold online in Indonesia to be around USD30–40 whereas sellers in the physical market stated the price between

USD90-100 (although the surveyors conducting the covert interviews were foreigners) (Gomez and Bouhuys, 2018).

The accounts of sellers in Japan suggested that smuggled otters are entering the domestic trade via animal dealers but sources are undisclosed for obvious reasons when traded to subsequent recipients. The survey revealed the recipients likely include pet shops, otter cafés, private owners and zoos and aquariums. Although it is not possible to assess the extent of actual trade in smuggled otters vis-à-vis that of legal ones, the observed trading practices and lack of traceability and legality checks are likely giving rise to conditions for smuggled otters to be laundered and traded through any of these routes. As one indicator, sources of otters were unknown/unclaimed in 34% of the 85 advertisements/sales records found in the combined online and physical surveys.

captive breeding in Japan

The domestic market survey suggested that many otters are claimed to be captive bred in Japan; representing 46% of the sources claimed by identified advertisements/sales records. However, no single breeder or breeding facility was named or identified by sellers to be regularly sourcing otters for the pet trade. Rather it appeared to be well understood that supply of domestic CB otters was erratic.

This seems to make sense because otters are undomesticated animals and breeding in captivity is not an easy task, especially for private breeders without sufficient knowledge. The successful breeding and the raising of newborns depends on many factors, making it sometimes difficult to predict even under ideal captive conditions of zoos (Yumiko Okamoto, IUCN SSC Otter specialist, *pers. comm.*, August 2018). The survey also elucidated that domestic zoos and aquariums are sources of domestic CB otters for the pet market. At least nine zoos and aquariums admitted to have sold otters born at their facilities to animal dealers, some of which were confirmed to have been put up for sale as pets. A large profit margin appears to be guaranteed for animal dealers involved in such trade as the price of the Small-clawed Otter traded from a zoo in one reported incident (JPY250,000 or USD2,250) (PEACE, *in litt.*, June 2018) was nearly four times cheaper than the retail price (JPY1 million or USD9,000 or more).

Overall, it seems likely that the erratic supply of domestic CB otters, coupled with the surge in demand, has caused an increase in price to the current high and stimulated the smuggling of cheaper otters from Southeast Asia. The emergence of a new business in 2017 importing what are claimed to be captive bred juvenile otters from Indonesia with CITES permits may also reflect these economics.

CITES imports

CITES imports overall were identified as another important source of pet otters, comprising 20% of the identified advertisements and sales records. While these appear legal at least at the level of international trade, certain sources of concerns were identified that called for further scrutiny, particularly concerning potential laundering into—and further within—Japan's market. Firstly, there were cases of commercial imports reported by Japan where the trade purposes reported by the exporting countries were non-commercial, including imports of two wild-sourced African Clawless Otter from South Africa (exported under purpose Zoo) in 2008 and four CB Small-clawed Otter from Indonesia in 2016 (exported under

purpose Personal). There were also two cases where the number of otters Japan reported as imports exceeded those reported by exporting countries. All these cases certainly warrant inspections. In its role as the CITES Management Authority (MA) in Japan, METI puts in place a stricter national measure whereby pre-authorisation, made by presenting export permits obtained from the government of the exporting countries, is required for importing live animals listed in CITES Appendix II. However, direct consultation with the respective CITES MA of the relevant exporting countries is conducted in some but not all cases (METI, pers. comm., Sept 2018).

The survey also detected potential evidence of otters imported under the purpose Zoo by an animal dealer and then being sold for pet trade. For example, an online advertisement for two Small-clawed Otter in 2014 was found with their origin stated to be a Malaysian zoo. However, the only potentially corresponding imports from Malaysia reported to CITES were under the purpose Zoo. In fact, nearly half of the surveyed zoos and aquariums were found to use animal dealers for sourcing otters (46% or 23 facilities out of 50), of which at least 15 facilities (30%) indicated the dealers were intermediaries in imports of otters from outside Japan. This was more than double the number (6 facilities or 12%) that stated to have conducted imports themselves. These findings highlight first and foremost the need for better monitoring of trading activities by animal dealers including their imports of CITES-listed species, but also stricter regulations over trading practices of zoos and aquariums, especially considering the public and educational roles of many such facilities.

Finally, the new business of Indonesian imports is worth focused attention: not only for the relatively large quantities of otters it seems to be sourcing but to examine the credentials of the so-called captive breeding operation in Indonesia. The Japanese business owner claims to have established the captive breeding facility, and claims to be accredited by the Indonesian government. While TRAFFIC has not been able to confirm this with the Indonesian government (Gomez and Bouhuys 2018), at least all of the CITES permits from Indonesia in 2017 stated the source of otters as "born in captivity" rather than "bred in captivity". The discrepancy with the Japanese business's claim warrants an inspection of the actual operation to confirm it does not involve any taking of animals from the wild, because otherwise it could have both legal and conservation implications in Indonesia (according to Gomez and Bouhuys (2018) no harvest quotas have been set for otters in Indonesia, which essentially protects otters from being poached or traded). The claim by the business that their captive breeding and pet trade operations is to benefit the conservation of threatened otters is also noteworthy in this regard.

regulatory needs

The lack of effective domestic trade regulations in Japan currently prevents establishment of any traceability system to ensure legal acquisitions, which in turn poses a serious challenge for eliminating the laundering of smuggled otters. LCES only protects non-native species that are CITES Appendix I listed, thereby affording no protection to the Small-clawed Otters widely traded as pets. This gives rise to the unregulated domestic trade of otters in Japan. While the Act of Animal Protection and Welfare obligates the display of origin when live animals are sold or advertised, the level of compliance with this requirement has been demonstrated to be extremely low in previous surveys of reptile pet markets

TRAFFIC report: Otter Alert

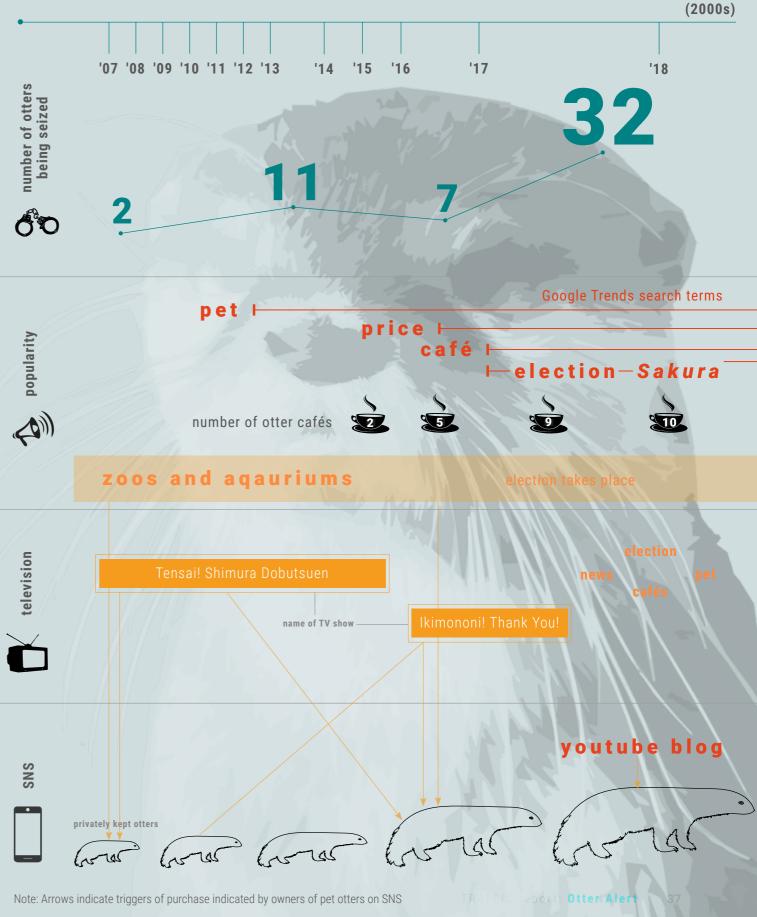
 $^{^{19}}$ Definition of specimens of animal species "bred in captivity" is provided in CITES Resolution Conf. 10.16 (Rev*)

(Wakao *et al.*, 2018), and the same was observed for the otter sales in the present survey. The lack of specific regulations for businesses and facilities dealing with threatened species including zoos, aquariums and other facilities is also a serious shortcoming with regards to managing Japan's exotic pet trade. As aforementioned, the Act of Animal Protection and Welfare requires all animal handling businesses to register. However, it is a general law designed primarily for the handling of domesticated animals and is considered mostly ineffective at regulating and enforcing responsible trading practices in threatened species (Wakao *et al.*, 2018). While there is no doubt that the private sector should strive for better compliance and responsible practices, new legal mechanisms are needed to afford the much needed protection to non-native threatened species from harmful exotic pet trade as also highlighted by previous TRAFFIC studies (e.g. Gomez and Bouhuys, 2018; Wakao *et al.*, 2018).



tracking the boom in demand for and trade in otters triggers and amplifiers

timeline



Various observations collected in the present rapid assessment suggest that the otter boom in Japan has grown over the past few years, becoming especially prominent in 2017. The visibility of pet otters on SNS and the contents broadcast by mass media were likely amongst the key factors initiating and amplifying the boom and demand. In terms of the general social trend, Google Trends highlighted the steady increase in otter popularity since around 2012 and its further intensification, particularly as pets, since around 2016 where the term "price" was frequently searched with the keyword "otter". In addition to the first otter election event taking place in 2017, the number of popular pet otters on SNS and the establishment of otter cafés both expanded around 2017. Picking up of these keywords in Google Trends further substantiates how these trends were reflected in public interests. While the mass media also covered these phenomena, one of its most significant influences could have been the popular TV series featuring the engagement of celebrities with the Small-clawed Otter pre-dating the recent boom.

The show likely planted the image of otters with humans (in this case, celebrities) in anthropomorphic situations such as travelling together and raising them at home, which presumably served to give viewers the impression that otters are more approachable and suitable as pets than they are in reality. In fact, the survey found that seeing the TV show was mentioned as a reason for purchasing otters by at least two prominent owners on SNS, while seeing images and videos of popular pet otters online or on TV were also mentioned as a reason for wanting to own otters.

While Japan's market for exotic pets is assumed to be steadily on the rise (Wakao *et al.*, 2018), such a rapid development of a large-scale boom for a specific species or groups of species is rather unseen in recent years and warrants reflection of the roles and responsibilities of the mass media and other influencers, particularly those pet owners on SNS. Indeed, the increase in popularity for certain wildlife following their appearance in popular content on TV and movies is a well-known phenomenon, though characterisation of their impact on wildlife trade is usually complex (e.g.Nijman and Nekaris, 2017).

The influence of online content, especially that generated by owners, and its potential in stimulating demand for wildlife has previously been shown through a case study of viral videos of slow lorises kept as pets (Nekaris *et al.*, 2013). Content posted daily by pet otter owners on SNS in Japan is likely creating a similar influence as gleaned through their followers' responses expressing their desire to own one as a pet. It is also worth noting that a popular Japanese YouTuber's video in which he reported his visit to one of the otter café-like facility in Tokyo in February 2018 rapidly gained popularity, reaching 6 million views by September 2018²⁰. Many viewers' comments included their interests in keeping otters as pets themselves.

Another notable trigger of demand was encountered at zoos and aquariums, where at least two owners of pet otters stated on SNS that seeing otters at such facilities motivated them to purchase. The "otter election" event which first took place in 2017 also clearly served to increase the general popularity of otters kept in zoos across Japan. Furthermore, a seller of otters at a pet shop visited during the survey stated the election event indeed sparked demand from customers. There are also peculiar elements in how otters are exhibited at certain zoos and aquariums which undoubtedly give visitors the impression

²⁰ https://www.youtube.com/watch?v=SgmTRWYLw4o&t=96s

that otters can be like "pets". For example, a popular aquarium in central Tokyo holds an "otter show" daily where otters are walked while being kept on the leash (photo below). In addition, there are at least three zoos and aquariums (one of which is a hybrid with a pet retailing business) which showcase otters that appeared in the aforementioned TV series. Although it cannot be said that zoos and aquariums in general are directly serving to trigger the demand for otters as pets, there is little doubt that the way otters are presented at certain facilities or collectively through the election event have some influence on the overall popularity and framing of their image as closer to humans rather than to wildlife.

While none of the acts of purchasing, keeping otters as pets or exhibiting them, using one in TV productions, or disseminating information that likely encourage demand for pets, are against any law in Japan, the responsibilities of involved parties, including companies/organisations and individuals, should be activated given the scale of the current boom and ramifications for wild otter populations. In the meantime, counter efforts to prevent the demand from further increasing are urgently required, and these parties and influencers are actually expected to play active and positive roles in framing responses in terms of social responsibility. This is already happening at a wider level in the online sector, in which the world's major tech companies have forged the Global Coalition to End Wildlife Trafficking Online (TRAFFIC, 2018). Instagram, a coalition member, has initiated user education activities to raise awareness of threatened species and illegal trade using pop-up alert messages when users search relevant hashtags (TRAFFIC, 2017). Such an initiative should definitely be encouraged to tackle the otter boom in Japan. However, in terms of the mass media and other related sectors in Japan that play a role in amplifying the exotic pet boom, the first step should be a review of policies at more fundamental level to recognise their responsibilities in illegal trade and conservation of threatened species.



Small-clawed Otters on show at an aquarium in Tokyo. While the otter was leashed and walked (like a pet dog), zoo staff member spoke about the biology and conservation status of the species. In her talk she also mentioned that despite their adorable looks otters are not suitable for keeping at home as a pet

discussion and ramifications

A negative impact of Japan's otter boom has already surfaced to organised smuggling of the Small-clawed Otter from Thailand to feed the demand in Japan as evident in the rise of seizure incidents after at least five, involving 39 otters, occurred in 2016 and 2017 (with 32 seized in 2017), accounting for 75% of all such otters seized since 2000. Importantly, seizures are only made intermittently and the true extent of smuggling into Japan's pet market is expected to be much more serious. As such, Japan's fever for otters, if allowed to continue, could have serious implications for wild otter populations as many populations in Southeast Asia are facing a wide range of conservation threats. Exploitation of otters is prohibited in many range states, including Thailand where Japanese smugglers are known to be sourcing otters. While some level of unauthorised captive breeding seems to take place in Thailand, most otters sold on the black market are thought to be illegally taken from the wild (Gomez and Bouhuys 2018). The present study also highlights the need to ensure any of the surging legal imports under CITES, particularly those from Indonesia starting in 2016–2017, do not affect the wild populations in range states as laundering of wild-taken animals for the international pet trade is a growing global concern (e.g. CITES, 2016; Nijman and Shepherd, 2015).

Apart from conservation concerns for otters in their wild habitats, there are other potentially serious ramifications arising from the otter boom. Firstly, the impacts of releasing exotic pets into local ecosystems have proven catastrophic and irreversible in many cases. For example, in Japan the Common Raccoon *Procyon lotor* introduced from North America as popular pets in the 1970s became established as an invasive alien species across the country as a result of escapes and deliberate release into the wild²¹ (National Institude for Environmental Studies, 2018). Unsurprisingly, the trigger of the pet raccoon boom was a popular cartoon series broadcast on national TV. The Common Raccoon has been designated as an Invasive Alien Species for their harm caused to ecosystems and humans, including competition with and predation of a variety of native species, damage to agricultural products and buildings and transmission of diseases such as rabies (National Institude for Environmental Studies, 2018). While the release of pet otters in the wild has not been confirmed²², it seems imminent that some owners may decide to release them given the difficulties of keeping otters as pets. In fact, one of the otter owners on SNS was found to have posted an advertisement searching for a foster parent for his/her otter because of the difficulty of keeping it with other pets at home (PEACE, *pers. comm.* June 2018).

Furthermore, a case of a pet otter being bought back by an animal dealer and later sold to a zoo was encountered during the survey, because the owner was no longer wanting to keep it at home. Although the likelihood of the Small-clawed Otter actually becoming established in local ecosystems remains unknown, temporary introduction into the wild can also pose a threat as it provides an opportunity for disease transmission (H. Sasaki and Y. Okamoto, *in litt.*, Sept 2018). The need for caution and awareness-raising seems granted given the many historical lessons. The Invasive Alien Species Act currently provides no preventative measures to curb such potential threats from exotic pets until the damage is substantiated.

Finally, the otter boom encompasses serious animal welfare issues, starting with the smuggling of newborn otters under inappropriate conditions to keeping them as pets or for display in limited spaces with their physiological needs unmet. During the survey, the surveyors were told that smuggled otters are often found in poor health and bad conditions and sometimes die early.

The conditions under which the otters were kept at pet shops or facilities like cafés should also raise concern as they were without exception kept in small cages or enclosures and most often fed commercially prepared pet foods. Needless to say, otters are not domesticated animals and require a complex environment consisting of both aquatic and terrestrial habitats and a nutritionally balanced diet. The IUCN SSC Otter Specialist Group, for example, recommends for the Small-clawed Otter a minimum enclosure size of 60 m² a pair and advise not to keep otters alone as they are sociable animals (Heap et al., 2008). Most of the staff at the café facilities or pet shops/fairs visited during the survey claimed that keeping otters at home was simple enough, although there were many discrepancies in the details of their suggestions about temperature control, what to feed, or the need for bathing etc. Another problem encountered was the lack of pet veterinarians with enough experience of treating otters or providing professional guidance to private owners.

The need seems obvious that only adequately equipped facilities (e.g. zoos and aquariums of high standards) with professional caretakers and veterinarians should be allowed to keep wild animals such as otters, but there is currently no legal framework in Japan to even define zoos and aquariums as such. The Act on Welfare and Management of Animals regulates "animal handling businesses" including selling, keeping, lending, training, and exhibiting [including the provision of opportunities for contact with animals]. However, the obligations and enforcement of the Act are both minimal, giving rise to the currently prevailing situations.

TRAFFIC report: Otter Alert 4:

²¹ The Common Raccon is designated as an invasive alien species by the Invasive Alien Species Act.

²² There have been reported multiple sightings of an animal resembling an otter in Tochigi Prefecture of Central Japan in April 2018 (Mainichi Shimbun, 2018).

RECOMMENDATIONS

Formulated as a reaction to the increased smuggling of the Small-clawed Otter from Southeast Asia, the present survey investigated the otter boom in Japan in order to understand the trade patterns and the demand-side dynamics. While the information collected through a rapid survey is not exhaustive, it has identified that the major triggers of the boom likely included mass media exposure, especially TV programmes featuring otters with celebrities and the visibility of private otter keepers on SNS. Public appeals at aquariums/zoos (including the otter election event) and at otter café facilities as well as amplification of such appeals through the media and SNS also stood out as drivers of increasing popularity. Japan's domestic market, on the other hand, was found to be dangerously unregulated for otters (mostly believed to be Small-clawed Otter) where untraceable and unchecked trade was occurring around animal traders. With the erratic supply of domestic CB animals, including those provided by domestic zoos and aquariums, it appears the elevated demand and price is inviting laundering of smuggled otters into the pet market. When considering these factors together, there is an obvious need in Japan for introducing effective regulations, transforming the pet trading industry practices, and engaging the various media that are currently feeding the demand to support behavior change efforts.

Centering on the lessons learnt from the case study of the otter boom, TRAFFIC recommends the following to address many of the common and systemic issues in Japan's market for exotic pets:

GOVERNMENT SECTOR



TO TACKLE SMUGGLING OF THREATENED SPECIES AS PETS AND ENSURE ANY INTERNATIONAL TRADE IS LEGAL AND SUSTAINABLE

- smuggling of threatened species as pets and crack down on smuggling operations inside Japan;
- The METI should closely communicate with CITES Management Authorities in range states to ensure

TO ELIMINATE LAUNDERING OF NON-NATIVE THREATENED SPECIES INTO THE DOMESTIC PET TRADE

- The government should consider a new legal mechanism to regulate the domestic trade in non-native species that are currently unprotected by LCES, especially CITES Appendix II species where illegal trade to Japan is known or species that are protected in their native range states (such as the Small-clawed Otter);
- The government should introduce a compulsory and enforceable traceability mechanism under the Act of Animal Protection and Welfare for threatened species (i.e. CITES-listed species) to ensure responsible trading practices by all animal handling businesses, including the management of captive breeding;

TO PREVENT AND ALLEVIATE NEGATIVE IMPACTS OF **EXOTIC PET BOOMS:**

- The government should consider a new legal mechanism to define zoos, aquariums and other facilities that are eligible to acquire, display or breed threatened species and regulate relevant aspects of their practices to ensure the highest standards of animal welfare, responsible trade and communication of threatened species contents to the public by such facilities;
- The government should consider a new legal mechanism to regulate the purchase and keeping of non-native animals, including to prevent introduction of invasive alien species into local ecosystems;

PRIVATE SECTOR

TO DISCOURAGE DEMAND AND ENHANCE POSITIVE CONSERVATION COMMUNICATIONS:

- Mass media companies should introduce a policy to consider carefully the impact of communicating information about threatened species, especially committing to refrain from content and messaging that may amplify the public demand for exotic pets and strive to bring about positive influence by communicating conservation issues and discouraging demand;
- SNS providers should consider a policy to discourage postings about privately owned pet species listed as threatened by the IUCN Red List for which illegal trade is known to be a problem. This would aim to prevent further amplification of demand and strive to enhance the education of SNS users and raise awareness of threatened species conservation;

TO ELIMINATE LAUNDERING OF SMUGGLED ANIMALS BY IMPROVING TRACEABILITY:

 The pet industry, including industry associations, individual dealers, pet shops, breeders and animal cafés, should enhance compliance with existing regulations, eliminate illegal trade by establishing a verifiable system for legal acquisition and traceability, and communicate accurate information about the origin of animals and their conservation and threat status in the wild to the consumers/visitors;

CURRENT/ASPIRING PET KEEPERS



TO AVOID FURTHER INCREASING THE DEMAND AND STIMULATING SMUGGLING

- Private keepers of otters and other exotic pets should recognise the possibility of stimulating demand and smuggling when communicating about their pets on influential media such as SNS and in the mass media;
- Aspiring keepers of otters or other exotic pets should learn about the conservation threats the
 respective species face, recognise the possibility that their demand could further fuel smuggling
 particularly given the unregulated market in Japan, and wisely refrain from purchasing.



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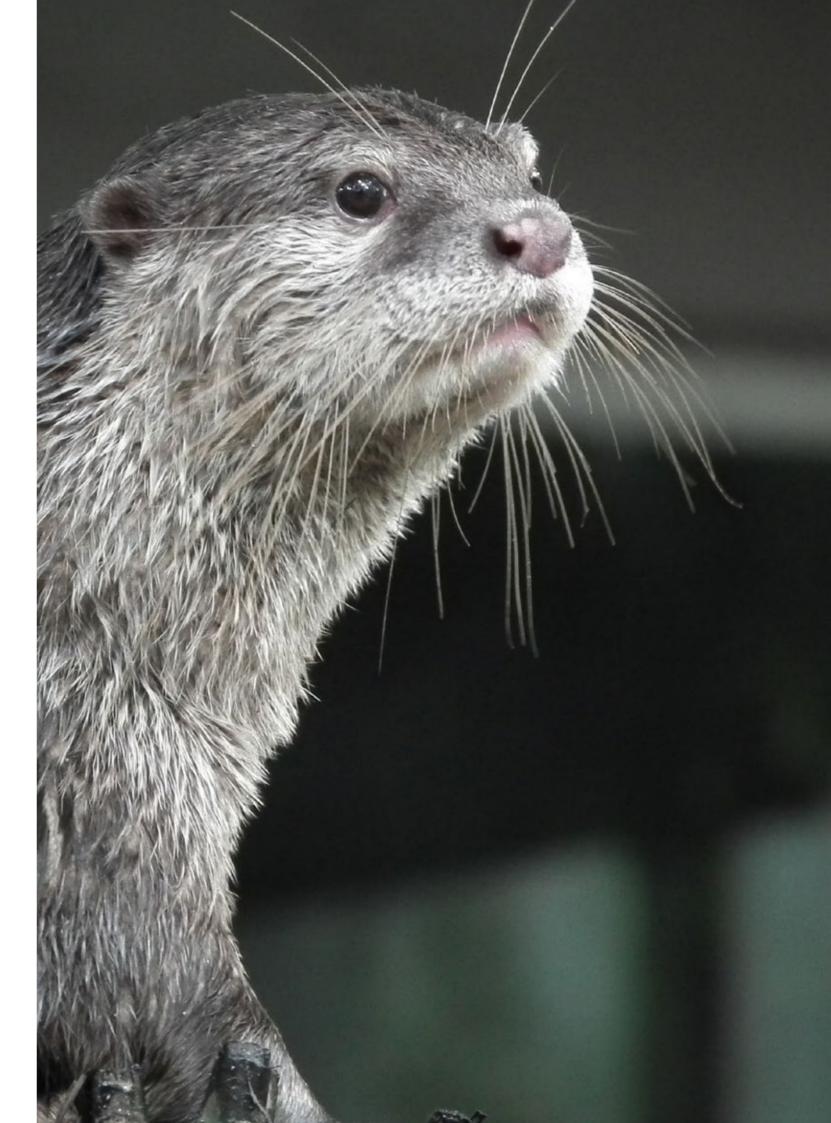
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