



Japan Tiger and Elephant Fund

WILDAID



# TOKYO IVORY

## CATERING TO INTERNATIONAL ORDERS

## About WildAid

WildAid is a non-profit organization with a mission to end the illegal wildlife trade in our lifetimes. While most wildlife conservation groups focus on protecting animals from poaching, WildAid primarily works to reduce global consumption of wildlife products such as shark fin, rhino horn, elephant ivory, pangolin scales and sea turtle products. With an unrivaled portfolio of celebrity ambassadors and a global network of media partners, WildAid leverages more than \$230 million in annual pro bono media support with a simple message: When the Buying Stops, the Killing Can Too. More information on WildAid can be found at [www.wildaid.org](http://www.wildaid.org)

## About JTEF

The Japan Tiger and Elephant Fund (JTEF), a non-profit and non-government organization, contributes to protecting the world of wildlife by representing their voice and interests, so that global biodiversity and the natural environment of human beings will be conserved. JTEF has committed to combating wildlife crime related to Japan and eradicating unsustainable wildlife trade by researching wildlife markets, analyzing the legal systems, keeping contact with the law enforcement communities, and working together with international / domestic organizations sharing the same goals. Learn more at [www.jtef.jp](http://www.jtef.jp)

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## Executive Summary

Illegal exports of ivory are continuing unabated. Though Japan, where the most visible and largest legal ivory market exists today, has been claiming that its market is not contributing to illegal trade, more and more ivory shipments from Japan have been seized in other countries: mainly China. Would authorized legal sales of ivory items facilitate illegal export of it? In order to examine this theory, WildAid and JTEF conducted an undercover investigation into two companies managed by Chinese nationals. Both companies were mainly targeting Chinese customers. The first one revealed that the ivory bought by customers at this shop had been seized by Chinese Customs, and that “a dozen of them were jailed.” The second business admitted to regularly producing items for Chinese customers from tens of thousands of cut ivory pieces stocked in its workshop and even manufacturing specific items that cater to orders from customers in mainland China. These businesses knowingly operate with the assumption that the purchased ivory items will eventually be exported. However, they are cleverly evading direct involvement in illegal export, and comply with the laws and regulations on domestic ivory trade. In order to end Japan’s involvement in illegal ivory exports, the only way forward is to close its legal ivory market as a matter of urgency, thus complying with the CITES resolution. Particularly, in Tokyo—Japan’s center for ivory sales and illegal export—ivory trade should be promptly banned without waiting for national-level responses.



## Background

### CITES resolution on closure of domestic ivory markets

Over the nine-year period between 2006 and 2015, the African Continent lost approximately 111,000 elephants (*Loxodonta africana*), due to poaching for ivory that was exclusively serving the demand in international markets. This led to a decline<sup>1</sup> in the African elephant population. In response to this crisis, in 2016, the 17th meeting of the Conference of the Parties (CoP17) to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) recommended closure of domestic ivory markets in the countries which are contributing to poaching or illegal trade. However, Japan, where the most open and largest legal ivory market exists today,<sup>2</sup> has been claiming that its market is not “contributing to poaching or illegal trade”, and thus it is not subject to the CITES resolution.<sup>3</sup> The African nations concerned about this stance taken by Japan proposed at CITES CoP18 in 2019 that the Parties, including Japan, which have not yet closed their markets, implement the closure.<sup>4</sup> This resulted in the adoption of a set of decisions to implement the recommended closure of domestic ivory markets at the meeting.<sup>5</sup>



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### Persistent illegal ivory export from Japan

The international community is concerned that Japan's legal ivory market has been playing a key role as a major supply source of ivory for illegal export as well as a cover for ivory that is illegally smuggled into the country.<sup>6</sup> Research by the Environmental Investigation Agency (EIA) confirmed at least 76 ivory shipments from Japan were seized in other countries based on

open-source information between January 2018 and December 14, 2020.<sup>7</sup> The majority of these seizures occurred in China. A recent analysis of ivory seizures linked to China and four selected Southeast Asian countries, conducted by TRAFFIC, identified at least 380 cases during 2019. In all these cases, the most commonly reported route was from Japan to China (36 cases).<sup>8</sup> A recent survey<sup>9</sup> of 422 Chinese consumers who travelled to Japan found that 19% planned to purchase ivory and an estimated 12% actually did make an ivory purchase. As many as 52% of the travelers included in the survey recognized that bringing ivory into mainland China was illegal. This calls for increased vigilance regarding illegal ivory exports from Japan to other Asian countries.<sup>10</sup>



另类玩具竟是象牙制品 斩断互联网上的象牙走私黑色链条  
乌鲁木齐海关缉私局侦办“1.11”象牙走私案纪实

发布时间：2019-04-17 14:00 星期三 来源：法制日报-法制网



Source: “Special toy turned out to be ivory – investigations against online ivory smuggling - Legal Daily Newspaper, April 17, 2019.”

Despite insistence from Japan that its domestic ivory sales are not contributing to the illegal trade, the above-mentioned cases clearly indicate that there is a major flaw in the prevention of illegal ivory flows from Japan to overseas destinations. The biggest challenge for Japan Customs is that, on the one hand, it must satisfy a swifter customs clearance of people and goods, and on the other hand, it has to enforce stricter law enforcement in preventing illegal drugs and terrorism-related materials<sup>11</sup> from entering the country. In this context, it is difficult for the border control team to carry out an extended search inspection necessary to effectively detect and seize illegal shipments of ivory set for export.

## Failure of public awareness campaign by the Government of Japan

On the domestic ivory market front, management is based on the Law for Conservation of Wild Fauna and Flora (LCES), which mainly focuses on preventing smuggled ivory from entering the market.<sup>12</sup> Accordingly, the LCES rule is virtually useless for prevention of illegal export of ivory. Therefore, as a measure to prevent ivory export, the Government of Japan (GoJ) started a campaign in collaboration with the private sector to make people aware of the illegality of ivory export. GoJ “sent a notification in November 2017 on prohibition of ivory import/export to the concerned organizations and kept tourists informed about the prohibition at its major airports.”<sup>13</sup> As a follow-up to the campaign, in March 2018, the Government of Japan also held several seminars nationwide about the amendment to LCES<sup>14</sup> and put the concerned businesses on notice about the importance of preventing illegal export of ivory.<sup>15</sup> The effectiveness of the awareness efforts, however, was brought into question by EIA after it investigated *hanko* shops in 2018 and found many shops attempted to sell ivory *hanko* knowing the customer intended to export it.<sup>16</sup> Though the efforts to raise awareness lasted for almost three years, a follow-up investigation by EIA/JTEF in 2020 revealed that close to 40% of the *hanko* shops which had refused to sell an ivory *hanko* in 2018, knowing the customer intended to send it abroad, have reversed their position, now offering to sell an ivory *hanko* under the same circumstances.<sup>17</sup>



Ivory *hanko* (name seal) ©JTEF

## Growing concerns about Japan's legal ivory market and the international community's expectations for Tokyo

In May 2019, New York City Mayor Bill de Blasio issued a letter to Tokyo Governor Yuriko Koike to support efforts to end the ivory trade in Japan.<sup>18</sup> Tokyo is home to 2,936 ivory trading facilities managed by 2,525 dealers registered with the government, accounting for 18% of the facilities across the country.<sup>19</sup> In response to the letter, in January 2020, Governor Koike announced the establishment of the Advisory Council on Regulation of Ivory Trade.<sup>20</sup>

The international community responded quickly to the steps taken by the Tokyo Governor. The African Elephant Coalition (AEC), which is made up of more than 30 African countries and which was the proponent behind the draft resolution on closure of domestic ivory markets at CITES CoP17, recently sent a letter to the Tokyo Governor urging Tokyo to close its market.<sup>21</sup> Several Africa-based organizations,<sup>22</sup> the former Director of the U.S. Fish and Wildlife Service<sup>23</sup> and the former Secretary General of CITES followed suit.<sup>24</sup> In December, the NYC Mayor's Office issued a follow-up letter to TMG to encourage further actions to conserve dwindling elephant populations.<sup>25</sup>

The decision makers of Japan, particularly TMG which is gaining attention as a promising player, will be tested on whether they are able to proclaim their intentions to take steps toward banning ivory trade within their jurisdictions expeditiously. To support the good work of TMG, WildAid and JTEF prepared this report bringing to light the darker side of Tokyo's legal ivory market, wherein a business' legal sale of ivory in Tokyo inevitably can lead to subsequent illegal export of that product. This report will further support the decision process of TMG to make a bold decision to end the illegal export of ivory from Japan.

# Revelation by a Chinese trader in Tokyo - ivory purchased at his shop by a dozen or more of his customers was seized by the Chinese customs.

This Tokyo-based company buys crafts made of coral and ivory in Japan, and sells them mainly to Chinese customers visiting his shop. The shop has been registered to GoJ based on LCES as dealing with ivory.

The shop operated by the company is located in an area of Tokyo that is crammed with jewelry shops, accessory shops, second-hand precious metal / jewelry shops, etc.

In October 2018 and November 2019, investigators carried out undercover investigations at the shop posing as regular customers. In December 2020, they confirmed that the shop is still operational.

The shop had various ivory crafts on sale indicating different geographical origins. For example, one item on sale was made in Japan during the Meiji era (1868-1912), while another was carved in Hong Kong. The shop openly displayed expensive items for sale as well.

During a conversation with the investigators in 2018, the company owner revealed that the ivory bought by customers at this shop had been seized by Chinese Customs, and that “a dozen of them were jailed.” He also said that, among the individuals whose ivory was seized, “70% of them are Chinese and 30% are Japanese.”



***The owner told investigators “10 or more of our customers were jailed...Yes, at the Customs, a dozen. Some Japanese are included. 70% of them are Chinese and 30% are Japanese.”***

# A Chinese trader in Tokyo/Chiba selling ivory crafts carved out of whole tusks legally obtained, but catering to mainland Chinese customers.

This company specializes in manufacturing and retailing ivory crafts. Originally it sold ivory crafts to Chinese customers which had been collected by the father of the present manager.

Over the last 10 years, the son and his wife shifted to manufacturing a variety of ivory items preferable for current Chinese taste within their own workshop and selling them at the shop. The company is legitimately registered to GoJ based on LCES as dealing with ivory.

The management of the company is based in Tokyo (the office for its operation and the retail shop), while the registered head office and the workshop are in Chiba. Additionally, it seems that there is a ‘basement storage place’ for keeping the stockpiles of whole tusks from drying out and cracking, but the address was not revealed.

Investigators carried out interviews and visits posing as buyers at the shop in October 2018 and November 2019, and at the workshop in November 2019. They also confirmed that those facilities were still operating in December 2020.

## The ivory crafts are displayed and sold legally, complying with LCES regulation

The shop, where it is shown that the company is legitimately registered, displayed a variety of ivory products which looked like they were made in mainland China, Hong Kong and Japan. The shop also had many different ivory items manufactured by the company itself, including beaded bracelets and necklaces (very popular in mainland China) as well as large-size pendants and charms, etc. There were also a lot of fancily carved *hanko* that are more preferable to Chinese, not Japanese customers. Some of those carved *hanko* were sold as pendants.



Whole ivory tusks procured in Japan were also on sale, being displayed together with the relevant registration cards as required by LCES.



## Ivory carving workshop, where ivory crafts are manufactured targeting Chinese customers

This ivory trader would purchase registered whole tusks in Japan, keep them in their basement storage temporarily and then bring them into this workshop. The tusks are then cut into pieces in a prismatic shape with designated sizes, stockpiled and then carved into a variety of items including ready-made items regularly sold to Chinese tourists.



In this workshop, the trader cuts registered whole tusks into pieces in designated sizes and stockpiles these for production of standard items.

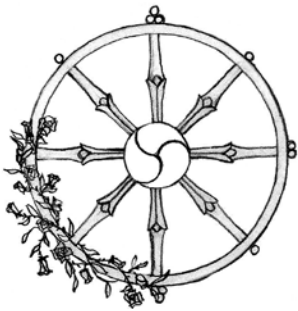
The number of the ivory pieces stockpiled was written on a whiteboard hanging on the wall of the workshop. Those pieces of standard quality had different sizes ranging from 4mm to 17mm in both length and width with 1mm increments in-between, with the exception of one large piece that was 22mm in both length and width. The so-called “blood tusk,” hewed out of “the best part of a tusk” (core part of a tusk), and the “skin,” which is carved out of the near-surface part and considered lower quality, were separately stocked from the standard quality pieces. The former was cut into sizes of 9, 12, 13 and 14mm in both length and width, while the latter “skin” -quality was cut into sizes of 8, 9, 10, 12 and 14mm in both length and width. The numbers of cut pieces shown on the whiteboard were 19,787 for the standard quality pieces, 615 for the “blood tusk” and 8,090 for the “skin,” amounting to 28,492 pieces in total.

Category	Size (mm)	Quantity
Standard Quality	4mm	16
	5mm	16
	6mm	16
	7mm	16
	8mm	16
	9mm	16
	10mm	16
	11mm	16
	12mm	16
	13mm	16
Blood Tusk	9mm	16
	12mm	16
	13mm	16
	14mm	16
Skin	8mm	16
	9mm	16
	10mm	16
	12mm	16
	14mm	16

The number of various category/sized cut ivory pieces written on a whiteboard hanging on the wall of the workshop.

## Carving the registered whole tusks which were obtained legally, catering to orders from mainland China

What surprised the investigators most was that the trader was manufacturing ivory crafts catered to specific orders from Chinese customers, including many located in mainland China. The company manager told the investigators at the shop, “We [produced and] sent a wheel of Dharma<sup>26</sup> to a Tulku [a reincarnated custodian of a specific lineage of teachings in Tibetan Buddhism] ... We made it after we were instructed by the Tulku about the size.”



A Dharma wheel (illustration)

When the investigators asked the wife of the company manager about whether they could produce a Dharma wheel as large as the one recently sent to the Tulku, she responded, “You need at least a tusk weighing more than 30kg ... a tusk weighing 15kg does not have enough width for a Dharma wheel unless it is uniquely short and thick ... So, you want to buy a whole tusk, don’t you? ... First, give me the size of the largest part of the wheel that you want. Then I can look for a tusk of the proper size for you.”

And when the investigators asked her about a Buddha statue, she explained, “For carving a Buddha statue, we need a tusk of a different size than the one for a Dharma wheel. Even a tusk with only 5cm diameter is sometimes enough, while one with more than 10cm would be required in other cases. In contrast, a tusk with 15cm is normally required for a wheel.”



She underscored, “In fact, it is easier for me if you buy a whole tusk. I can even give you discount on the cost for carving the tusk. All the rest of the parts after carving belong to you. You can take them and do whatever you want to do to them.” This indicates that customers who make an order for such ivory crafts are required to pay the cost for a whole tusk as well as the carving fee. The manager also stated, “I only buy ivory with original certification [registration card].” In fact, both the tusks in the retail shop as well as those in the workshop all had the relevant registration cards attached, as far as the investigators could tell. Certainly, this trader intended to comply with LCES when they bought the ivory as a raw material.



The whole tusks found in the workshop each had the relevant registration cards attached

**The supply of the registered whole tusks for carving was sourced from a former executive member of the ivory association (an organization subsidized by the Tokyo Metropolitan Government)**

She was not willing to mention the scale of their stockpiles of registered whole tusks, but finally said, “Few hundreds, I think.” And, surprisingly, she unveiled that the source of the tusks was a former executive member of the “Tokyo Ivory Arts and Crafts Cooperative Association,” which prominently represents Japan’s ivory industry and has been receiving a subsidy every year from TMG<sup>27</sup> to be used for activities enabling resumption of international ivory trade in supplying ivory as a raw material into the domestic market.<sup>28</sup> The Association has been demonstrating its efforts to eliminate illegal ivory export on its website<sup>29</sup> and in its written presentation at the 3rd meeting of the Tokyo Advisory Council on Regulation of Ivory Trade,<sup>30</sup> appealing that members of the Association explain to their customers that taking ivory items abroad is prohibited.

The company manager’s wife continued, “The Ivory Association is so influential in Japan even on the matter of the Washington Convention (CITES), so ivory is still not banned in Japan ... Although we cannot become a member of the Association, we do have good relationship with an executive member ... He has already retired ... That’s why we can buy cheap stuff from him.”

Even if her statement is true, the sales of registered whole tusks from the former member of the Association to the company are not considered illegal. However, it is unlikely that the seller did not know the buyer was producing ivory items catered mainly for Chinese customers. If this is the case, the association must be socially responsible for this matter and so must be the TMG in supervising the association.

**Dependent on illegal export of ivory, while staying within the domestic legal legislation and never being involved with the export itself**

Has the company been involved somehow with their customers’ export of ivory? The wife of the manager said, *“What we do is simple, after payment we deliver the ivory at the customer’s request. Train station or airport. The customers are responsible for*

*whatever happens after that ... It depends on the ability of the customers [whether they can successfully take the ivory into China or not], I never asked. It’s simple. You buy the ivory from me in Japan. That’s all.”* Certainly, this company intends to avoid directly facilitating the customer’s ivory export so that it can circumvent being accused of aiding and abetting illegal export.

## Conclusion

The persistent illegal ivory exports from Japan are not just a coincidence, rather a consequence of “the authorized legal market selling any kind of ivory items,” which easily allows the traders to stay within domestic trade regulations while assuming a ‘default’ export role. The incident where a dozen or more customers whose ivory purchased at a shop in Tokyo was seized in China demonstrates this pattern. Another trader is regularly producing items for Chinese customers from tens of thousands of cut ivory pieces stocked in its workshop and even manufacturing specific items that cater to orders from customers in mainland China. This trader is sourcing whole tusks registered with LCES for the raw material and openly selling ivory items carved from them, operating as a legitimately registered dealer based on the law. The trader is conducting his ivory business in a way to meet [illegal] international demand, without any fear or embarrassment of being identified. He is cleverly evading any suspicion of being involved in illegal export by showcasing himself to be a good trader who complies with the laws and regulations mandated by LCES on domestic ivory trade. The ivory trade controls based on LCES are unable to prevent such abuse of the system by shady businesses. Furthermore, the Government’s awareness campaign announcing “*export of ivory is illegal*” has been completely mocked by these traders as they can easily side-step the export phase of the trade. In order to end Japan’s involvement in illegal ivory exports, the only way forward is to close its legal ivory market as a matter of urgency, thus complying with the CITES resolution. Particularly, in Tokyo–Japan’s center for ivory sales and illegal export–ivory trade should be promptly banned without waiting for national-level responses. The actions TMG will take in the near future will be under immense scrutiny both by the local and international communities.

## Recommendations

### For the Tokyo Advisory Council on Regulation of Ivory Trade:

- Considering the fact that legal ivory trade is facilitating substantial illegal ivory exports, it is clear that there is no way other than closing the legal market to prevent ongoing illegal ivory exports. Hence, we propose the Council should recommend that the Tokyo Metropolitan Government establish and implement an Ordinance banning ivory trade within its jurisdiction as a matter of urgency.

### For the Tokyo Metropolitan Government:

- Prohibit the sale and purchase of ivory, as well as the display or advertisement of ivory for sale, within the Tokyo jurisdiction as soon as possible through an Ordinance adopted by the Tokyo Metropolitan Assembly.
- To prepare for the 2020 Games as scheduled, take the following measures:
  - Develop guidelines for ivory retailers to suspend ivory sales temporarily, including online transactions, at least from 1 July 2021 until 30 September 2021 to comply with the “ivory free” policy
  - Widely publicize the policy recommendations to educate ivory traders and the public/potential consumers about Tokyo’s new “ivory free” declaration through a range of media (press release, signs, billboards, television, radio, newspaper, in various languages for international visitors, etc.)
- After the Games, or should the Games not proceed as scheduled, take the following measures:
  - Develop guidelines prior to the implementation of a legal ban for ivory retailers to phase-out ivory sales
  - Consider publicly acknowledging and commending retailers who opt to comply with the “ivory free” policy and end their ivory sales, for example by featuring a public list, issuing certificates/signs for store windows, etc.
  - For retailers who intend to continue to sell ivory, urge them to report on what measures they are taking to ensure that ivory sold by them is not being illegally exported, sales records, and basic customer information to the Tokyo Metropolitan Government
- The Tokyo Metropolitan Police Department should elevate law enforcement efforts to stop the illegal trade and export of ivory.

### For the Government of Japan:

- Close the ivory market urgently to align with commitments under CITES Resolution Conf. 10.10 (Rev. CoP18).
- Japan Customs should prioritize the interdiction of illegal ivory exports and take necessary actions to implement such a policy.

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