



February 9, 2022

The Honorable Yuriko Koike  
Governor of Tokyo  
Secretarial Section, General Affairs Division, Office of the Governor for Policy Planning  
Tokyo Metropolitan Government  
8-1 Nishi-Shinjuku 2-chome  
Shinjuku-Ku, Tokyo 163-8001  
Japan

**Re: Specific Recommendations by the Advisory Committee on Regulation of Ivory Trade Needed**

Dear Governor Koike:

Tokyo's Advisory Committee on Regulation of Ivory Trade has continued to meet for two years, albeit with some delays due to the pandemic. The Committee finally started to discuss the draft outline of its concluding report at the 6th meeting on January 27th. We are writing to express our concern about the current approach regarding recommendations from the Advisory Committee for the Tokyo Government moving forward.

We commend you and the Tokyo Metropolitan Government for addressing Tokyo's role in the ivory trade. As major markets close worldwide in a global shift led by the United States and China to protect elephants from poaching to supply the ivory trade, your leadership in Japan has been critical. As you know, the International Union for Conservation of Nature (IUCN) recently raised the threat level of the African savannah elephant from Vulnerable to Endangered and listed African forest elephants separately as Critically Endangered, a change that warrants collective global action to protect these species.

As presented at the 6th meeting, the draft outline did not include a recommendation section to the Governor from the Advisory Committee. During the meeting, three out of five members in attendance (excluding the Chair), a majority, spoke out that the Advisory Committee must present specific recommendations in a report to the Governor, including the consideration of ivory trade regulations based on an Ordinance and other measures. However, after hearing a dissenting minority opinion that ivory trade in Japan was not a concern, the Chair of the Advisory Committee, in association with the Secretariat, surprisingly took a stance that the Advisory Council will not adopt any recommendations without consensus. Given the current positions of the Committee members, proceeding without formal consensus will lead to an absence of final recommendations, or lackluster recommendations without impact, from the Advisory Committee.

In this case, the minority opinion is based on a general disinclination for legally binding measures, a dismissive attitude towards precedence in other ivory consuming nations, and personal preferences and desire for resumed international trade in ivory, which is unlikely in the near future. However, a policy solution and specific recommendations should be based on evidence and the objective circumstances. Moreover, legally binding measures must be an option for consideration by the Advisory Committee on Regulation of Ivory Trade, as suggested by the name of this committee.

Choosing to not move forward without formal consensus recommendations is essentially siding with the minority opinion; choosing to retain the status quo in Tokyo despite concerns raised by you, which prompted the establishment of the Advisory Committee, is a de-facto recommendation.

As you stated at the press conference on January 10, 2020, “this advisory committee we established at this time aims to assess the present regulation of domestic ivory trade, and discuss what measures Tokyo should take. Based on the result, we will start those measures from the one that can expeditiously be taken.” The Committee was mandated by you to provide specific recommendations on the regulation of ivory trade.

Excluding the need for specific recommendations regarding the regulation of ivory trade from the final report, according to the present position of the Secretariat and the Chair of the Committee, contradicts the intention of the assessment process and Committee establishment, and fails to fulfil its goals. Without recommendations on how Tokyo should move forward to regulate the trade in ivory, the ivory trade assessment process has had no purpose.

Thus, we respectfully request you to direct the Secretariat to pursue recommendations on the regulation of ivory trade within Tokyo and include them in the final report, and also urge the Chair of the Advisory Committee to focus attention on closing the assessment process with recommendations for Tokyo.

Thank you for your continued dedication to the environment, including the protection of the world's iconic elephants.

Sincerely,

**Center for Biological Diversity  
David Shepherd Wildlife Foundation  
Environmental Investigation Agency  
Fondation Franz Weber  
Humane Society International  
Japan Tiger and Elephant Fund  
Japan Wildlife Conservation Society  
Pan African Sanctuary Alliance  
WildAid**

Cc: Isao Sakaguchi, Chair of the Advisory Committee on Regulation of Ivory Trade  
Kazuhiro Goto, Director of Policy Coordination, Office of the Governor for Policy Planning