



November 4, 2022

His Excellency Fumio Kishida  
Prime Minister of Japan  
Cabinet Secretariat  
Government of Japan  
1-6-1 Nagata-cho, Chiyoda-ku  
Tokyo 100-8968  
Japan

## Re: Closure of Japan's Domestic Ivory Market

Dear Your Excellency:

We are writing to draw your attention to the plight of Africa's endangered elephants, which continue to be poached for their ivory tusks. While Africa seems far away, Japan can play a role by closing its legal domestic market for elephant ivory. We urge you to commit to the closure of Japan's domestic ivory market to send a signal to the global community that Japan is ready to join other countries and take a significant step to protect Africa's elephants from being killed for their ivory.

To combat the poaching of elephants and trafficking in ivory, many global leaders, including China, the United States, United Kingdom, European Union, and Singapore, have closed their domestic ivory markets, with some very limited exceptions. Those actions have also been informed by requests from the majority of African elephant range States, asking that ivory markets be closed. By closing these domestic ivory markets, governments send a clear message that the trade in ivory is unacceptable, enhancing and supporting both enforcement and demand reduction efforts. Japan is the world's most significant open ivory market today. Our organizations, and others such as TRAFFIC and WWF, have repeatedly appealed to Japan to close its market.

Under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), in 2016 Japan agreed to language recommending that all countries with legal ivory markets linked to poaching or illegal trade to close them urgently. However, even though evidence indicates that Japan's market controls are porous and enable the illegal domestic trade while also contributing to the illegal international trade,<sup>1</sup> Japan's market remains open.

Seizures of ivory from Japan are being made in other jurisdictions, particularly China<sup>2</sup>, and reports indicate that before the pandemic, tourists from China identified Japan as an easy legal source of ivory<sup>3</sup>, from where they would often export illegally. Moreover, a new report released this week<sup>4</sup> found that in an analysis of Chinese court cases of smugglers illegally importing ivory from Japan, half the smuggling cases were by organized criminal groups. It is clear that Japan's market is being targeted as a source of "legal" ivory, not only by tourists but also transnational organized criminal groups, who find it easy to acquire this profitable commodity in Japan's open market.

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<sup>1</sup> EIA/JTEF. (2022) Last But Not Least: Japan's Domestic Ivory Market. Available at: <https://us.eia.org/report/0220303-last-but-not-least-japans-domestic-ivory-market/>

<sup>2</sup> EIA. (December 2020) Japan's Illegal Ivory Exports. <https://us.eia.org/campaigns/wildlife/elephants/japan-ivory/>

<sup>3</sup> GlobeScan Incorporated / WWF. (October 2020) Beyond the Ivory Ban: Research on Chinese Travelers While Abroad. <https://wwf.panda.org/?968516/Ivory-Consumption-Chinese-Travelers>

<sup>4</sup> Sakamoto M. 2022. Smugglers' Source: Japan's Legal Ivory Market; An Analysis of Chinese Court Decisions of Ivory Illegally Exported from Japan. Japan Tiger and Elephant Fund [https://www.jtef.jp/en/wp-content/uploads/2022/10/IvoryNov22\\_E.pdf](https://www.jtef.jp/en/wp-content/uploads/2022/10/IvoryNov22_E.pdf)

In its declared stockpile, Japan has 244 tonnes of ivory<sup>5</sup>, accounting for 84% of Asia's declared ivory stockpile (289.82 tonnes<sup>6</sup>) and 31% of the world's declared stockpile (796 tonnes<sup>7</sup>). It is clear that Japan's market plays a significant role in the international market, and that its very existence poses a threat to efforts to reduce demand for ivory and enforce ivory market closures to protect elephants in other countries. It also undermines enforcement by African countries. There is no way in today's globalized world to have a well-controlled domestic ivory market that acts in isolation from the rest of the world. In acknowledgement of the connectedness of markets, the European Union made the decision earlier this year to close its legal domestic ivory market with narrow exemptions<sup>8</sup> to "reduce the risk that ivory items acquired in the EU and then exported to third countries could fuel the demand for illegal ivory items, and thus undermine enforcement and demand reduction activities."<sup>9</sup>

In Tokyo, Governor Koike instigated an ivory trade assessment process in 2020. Earlier this year, an appointed Advisory Committee on the Regulation of Ivory Trade released its official recommendations after two years of deliberations. The recommendations to the Tokyo Metropolitan Government include that the government should consider legal measures to address trade in ivory and to urge the national government to take further action<sup>10</sup>.

The nineteenth meeting of the Conference of the Parties (CoP19) to CITES will be held in Panama City, Panama, 14 - 25 November 2022<sup>11</sup>. We urge Japan to commit to urgently closing its domestic ivory market and encourage you, via your CITES delegation, to make a political commitment at CoP19 to close Japan's market, and commit to the conservation of elephants. Thank you for your attention to this matter.

Sincerely,

Born Free Foundation  
Center for Biological Diversity  
David Shepherd Wildlife Foundation  
Environmental Investigation Agency  
Fondation Franz Weber  
International Fund for Animal Welfare  
Japan Tiger and Elephant Fund  
Pan African Sanctuary Alliance  
Pro Wildlife  
Wildlife Conservation Society

Cc: Mr. Yasutoshi Nishimura, Minister of Economy, Trade and Industry  
Mr. Akihiro Nishimura, Minister of Environment  
Mr. Yoshimasa Hayashi, Minister of Foreign Affairs  
Ms. Yuriko Koike, Governor of Tokyo  
Mr. Rahm Emanuel, United States Ambassador to Japan  
Ms. Julia Longbottom, United Kingdom Ambassador to Japan  
Mr. Jorge Rodriguez Romero, Head of Unit Global Environmental Cooperation and Multilateralism  
European Commission Directorate-General for Environment

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<sup>5</sup> CITES SC74 Doc. 39. Closure Of Domestic Ivory Markets: Report of The Secretariat <https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-39.pdf>

<sup>6</sup> CITES. [https://cites.org/eng/prog/terrestrial\\_fauna/elephants](https://cites.org/eng/prog/terrestrial_fauna/elephants) (as declared by 28 February 2021)

<sup>7</sup> Ibid.

<sup>8</sup> CITES SC74 Inf.10 <https://cites.org/sites/default/files/eng/com/sc/74/Inf/E-SC74-Inf-10.pdf>

<sup>9</sup> CITES SC74 Doc.39 Annex 2 <https://cites.org/sites/default/files/eng/com/sc/74/E-SC74-39.pdf>

<sup>10</sup> [https://www.seisakukikaku.metro.tokyo.lg.jp/cross-efforts/2022/09/images/Zouge\\_Report\\_ENG.pdf](https://www.seisakukikaku.metro.tokyo.lg.jp/cross-efforts/2022/09/images/Zouge_Report_ENG.pdf)

<sup>11</sup> <https://cites.org/eng/cop/19/agenda-documents>