



September 28, 2026

Mr. Hiroyoshi Sasagawa
Minister of the Environment
Ministry of the Environment
Godochosha No. 5, Kasumigaseki 1-2-2
Chiyoda-ku, Tokyo 100-8975
Japan

Re: Request to Tighten Elephant Ivory Trade Regulation Under Upcoming 2027 ACES Amendment

Dear Minister Sasagawa:

On July 28th, the Ministry of Environment issued a press release¹ on the report² of the Act for Conservation of Endangered Species of Wild Fauna and Flora (ACES) Review Committee, which includes a review of comments regarding the domestic trade of elephant ivory in Japan in section (3) Verification and Improvement of the Effectiveness of Ivory Trade Regulations.

Because the Central Environment Council will be consulted on specific details, and the Subcommittee on Wildlife will continue deliberations on the necessary measures going forward, our organizations are writing to urge your strong consideration of specific amendments to ACES for implementing measures to further tighten controls on ivory trade to reduce the risk of illegal trade and export.

The Environmental Investigation Agency US, Japan Tiger and Elephant Fund, Japan Wildlife Conservation Society, and Tears of the African Elephant, advocate for the closure of all markets for elephant ivory to support elephant conservation. Closing domestic markets supports the ban on international commercial ivory trade, simplifies law enforcement efforts by eliminating gray markets, and sends a clear signal that elephant ivory is not a commodity for profit. The ivory trade perpetuates the demand for ivory, which is responsible for elephant poaching. According to a recent United Nations Office of Drugs and Crime's (UNODC) World Wildlife Crime report,³ the shrinking of global ivory markets is linked to the collapse in the price of ivory that led to the decline of elephant poaching and ivory trafficking in recent years. Our organizations urge countries with legal ivory markets, like Japan, to close them urgently.

Japan's current market controls have been repeatedly shown to be insufficient to prevent illegal trade and illegal export of elephant ivory. Trade controls based on the ACES and its implementation orders leave ample room for rampant illegal trade and export. In lieu of closing the market, Japan should take sufficient steps to tighten regulations and their enforcement to eliminate the risk of illegal trade and export.

In addition to the strong need for stricter regulations to minimize the possibility of illegal trade and illegal exports under the existing legal trade regime, public perspectives on ivory and the realities of the modern ivory industry are also relevant to the decision-making process. In early 2026, EIA commissioned a survey to assess Japanese public perceptions of ivory and ivory trade regulations, which will be released in a report this year. The results of surveying 2,000 Japanese adults suggest Japan's domestic ivory market no longer reflects broad consumer demand for ivory or everyday use.

¹ https://www.env.go.jp/press/press_05369.html

² <https://www.env.go.jp/content/000418696.pdf>

³ https://www.unodc.org/cofrb/uploads/documents/ECOS/World_Wildlife_Crime_Report_2024.pdf

Some Key Findings:

- 56% of respondents said they did not know what ivory was
- Only 18% of respondents confirmed owning ivory products (mostly *hanko*)
- 73% of respondents said they had no interest in purchasing ivory products
- Only 23% of respondents knew ivory products are still legally sold in Japan
- Only 13% were aware that legally sold Japanese ivory has been illegally exported abroad

Curtailing the legal ivory market would have a negligible impact on the lives of most Japanese citizens and is unlikely to generate negative views towards the Japanese government. These data correlate with the decline in registered ivory traders, from more than 13,000 in 2019 to less than 4,500 in 2026. Surveys of ivory retailers undertaken by the Ministry of Economy, Trade and Industry (2025) and the Tokyo Metropolitan Government (2020) also indicate that most ivory retailers do not rely on sales from ivory products to maintain their businesses. Yet, current policies aim to protect and support the ivory industry that is in decline and no longer needed by the public. Given the market realities, conditions in Japan are ripe to implement rigorous, strengthened regulations on the ivory trade.

The ivory trade control system needs to be strengthened significantly to ensure traceability and legality throughout the entire supply chain—from whole tusks to processing into finished products and final sale. Specifically, we recommend that: 1) the range of ivory eligible for registration be expanded; 2) the range of ivory for which traceability forms are required be expanded; 3) registered ivory businesses be prohibited from accepting ivory without a traceability form; 4) monitoring and enforcement of compliance with ivory registration and traceability form requirements be increased; 5) registered ivory businesses be required to report on ivory tusk transactions; and 6) mandatory protocols for ivory businesses (including e-commerce) to confirm that purchasers do not intend to export be implemented.

In closing, we respectfully urge your ministry to consider amendments to the ACES which strengthen ivory trade controls in Japan to prevent illegal domestic trade and export and support elephant conservation.

Yours sincerely,

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