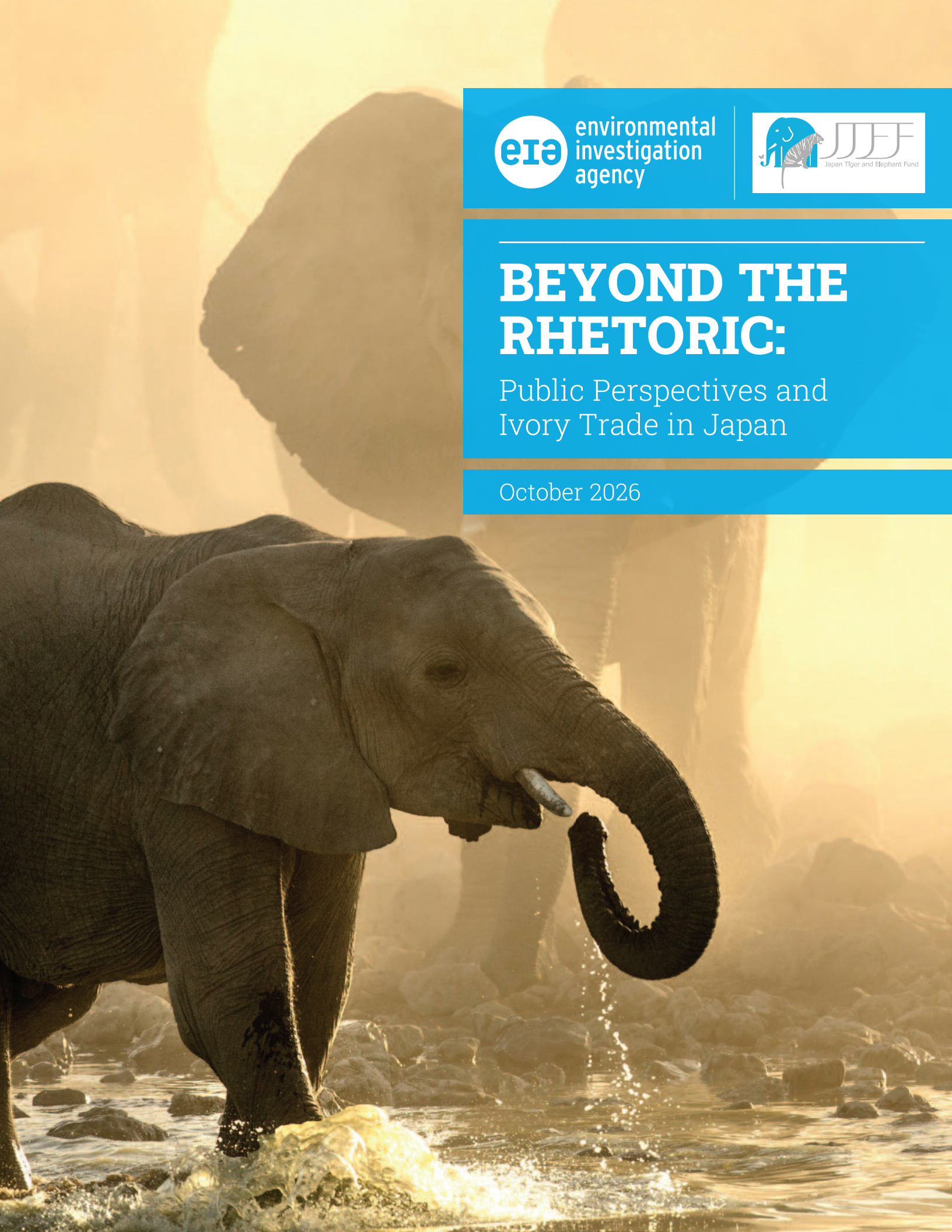


environmental investigation agency

JJEF Japan Tiger and Elephant Fund

BEYOND THE RHETORIC:

Public Perspectives and Ivory Trade in Japan

October 2026



Source: Lemos | Upsplash

ABOUT EIA

The Environmental Investigation Agency (EIA) investigates and campaigns against environmental crime and abuse. For over three decades, EIA has exposed transnational wildlife crime with a focus on elephants and rhinos, and forest crimes such as illegal logging and deforestation for agricultural commodities. We reduce the impact of climate change by campaigning to eliminate powerful greenhouse gases and improve energy efficiency in the cooling sector, and exposing related illicit trade. We use our findings to campaign for new legislation, improved governance, and more effective enforcement.

ABOUT JTEF

Japan Tiger and Elephant Fund (JTEF) is a certified non-profit and non-governmental organization based in Tokyo, Japan, dedicated to protecting endangered wildlife and conserving global biodiversity. JTEF works to safeguard elephants, tigers, and the critically endangered Iriomote cats through advocacy, education, and on-the-ground conservation.

ACKNOWLEDGMENTS

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Source: EIA

SUMMARY

The international commercial trade in elephant ivory is banned and most of the world's major domestic markets have closed.

The most glaring exception is Japan, which maintains the world's largest legal market for ivory. Japan's market perpetuates the demand for ivory and its deficient trade controls facilitate illegal trade and export.

A recent public survey in Japan commissioned by EIA reveals that local demand for ivory is limited and declining. The findings suggest that rather than existing as a visible or actively debated part of public life, the domestic ivory market persists largely outside mainstream public awareness. The survey results align with insights from the ivory retail industry indicating that their reliance on elephant ivory to sustain their business continuity and livelihoods is also in decline. The survey reveals waning interest in owning or purchasing ivory products among the Japanese public, suggesting that the public would largely not oppose closing the domestic ivory market.

By propping up the legal market, the Japanese government continues to signal that it supports the trade in ivory – despite the known risks that ivory trade poses to the survival of wild elephants.

Japan's market exists as an easy source of ivory for criminals looking to make a profit as evidenced by repeated seizures at foreign borders of ivory illegally exported from Japan – intended for resale in those countries. The Environmental Investigation Agency (EIA) and Japan Tiger and Elephant Fund (JTEF) call on Japan to close its market or otherwise implement stricter measures comparable to other effective near-total ivory bans to ensure its ivory supply does not stimulate the global demand for ivory or elephant poaching.

Above: A range of ivory products on sale in a Tokyo shop.



INTRODUCTION

Elephants face a myriad of threats, from habitat destruction and human-wildlife conflict to a changing climate and poaching for their ivory tusks.

The demand for ivory is what drives elephant poaching – and all ivory markets fuel that demand. While addressing the illegal trade in ivory is critical, closing remaining legal markets is essential for law enforcement success and for sending a strong signal to potential consumers that ivory is not a commodity to be bought and sold. In short, closing all ivory markets supports the conservation and protection of elephants.

In 1989, the global community agreed to end the international commercial trade in elephant ivory under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in response to an intense poaching crisis in Africa. However, many domestic markets remained open and two CITES "one-off sales" of ivory to supply domestic markets sparked new demand, which precipitated another African elephant poaching crisis that peaked in 2011. In 2016, all countries were urged under CITES to take steps to close domestic ivory markets that contribute to poaching or illegal trade, and nearly all major ivory markets closed including in China and the United States.

Japan has remained the principal outlier by maintaining its legal domestic market for ivory. Japan was a major consumer of ivory in the 1970s and 1980s, a recipient of ivory in both aforementioned "one-off sales", and since 1970 has imported ivory from more than 260,000 African

elephants, much of it from poached animals.[1] While the demand for ivory has subsided since its peak in the 1980s, the Government of Japan has long defended the ivory market as culturally necessary, particularly through the continued use of ivory *hanko*, traditional personal seals commonly used in place of signatures. While the use of *hanko* in Japan dates back thousands of years, ivory is not a traditional material for *hanko* and was instead popularized by the ivory industry in the 1960s and 1970s in a marketing campaign to increase ivory sales.[2]

Today, Japan maintains the world's largest legal domestic ivory market with at least 250 tonnes of ivory available for purchase according to documents prepared by the government in 2025.[3] The Government of Japan has vowed that "Japan has been implementing stringent measures to ensure that its domestic ivory market does not contribute to poaching and illegal trade" and also argued that ivory use is rooted in Japanese culture and has been accepted by Japanese people.[4]

JAPAN'S IVORY MARKET: WHAT THE JAPANESE PUBLIC ACTUALLY THINKS

To better understand current public attitudes toward ivory and Japan's domestic ivory market, the Environmental Investigation Agency US (EIA) commissioned CarterJMRN K.K., a leading Japanese market research firm, to conduct a nationally representative survey of 2,000 Japanese adults between January and February 2026 (see Figure 1). The nationwide online survey explored awareness of ivory, attitudes toward elephant conservation, and views on the future of Japan's ivory market.

Public Awareness of Ivory-Related Issues

When asked, fewer than half of Japanese adults said they knew what ivory was (see Figure 2). Awareness was especially low among younger age groups, with just

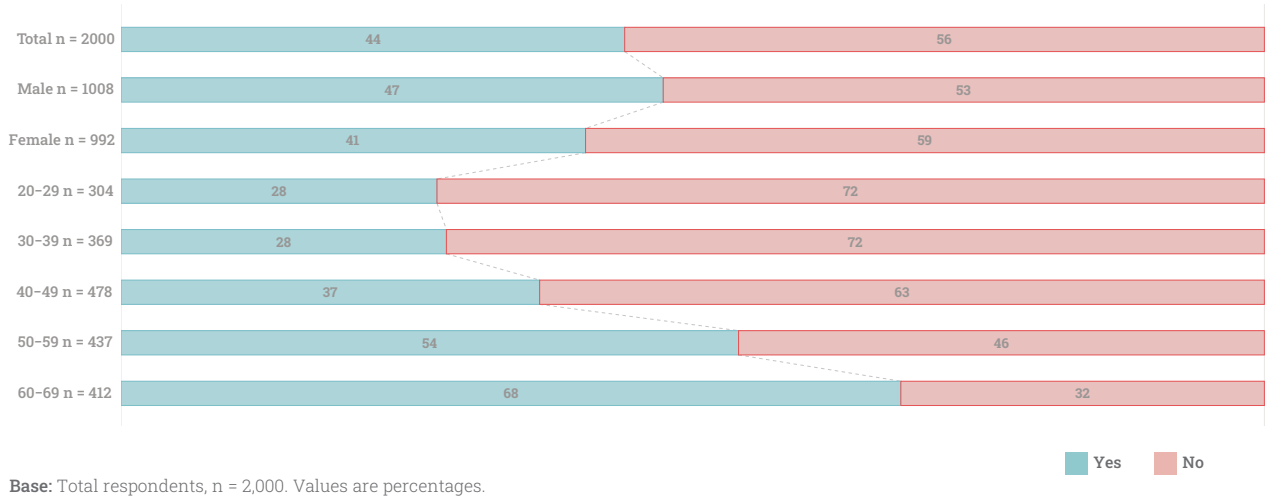
Figure 1: **Survey demographics**



Key Findings

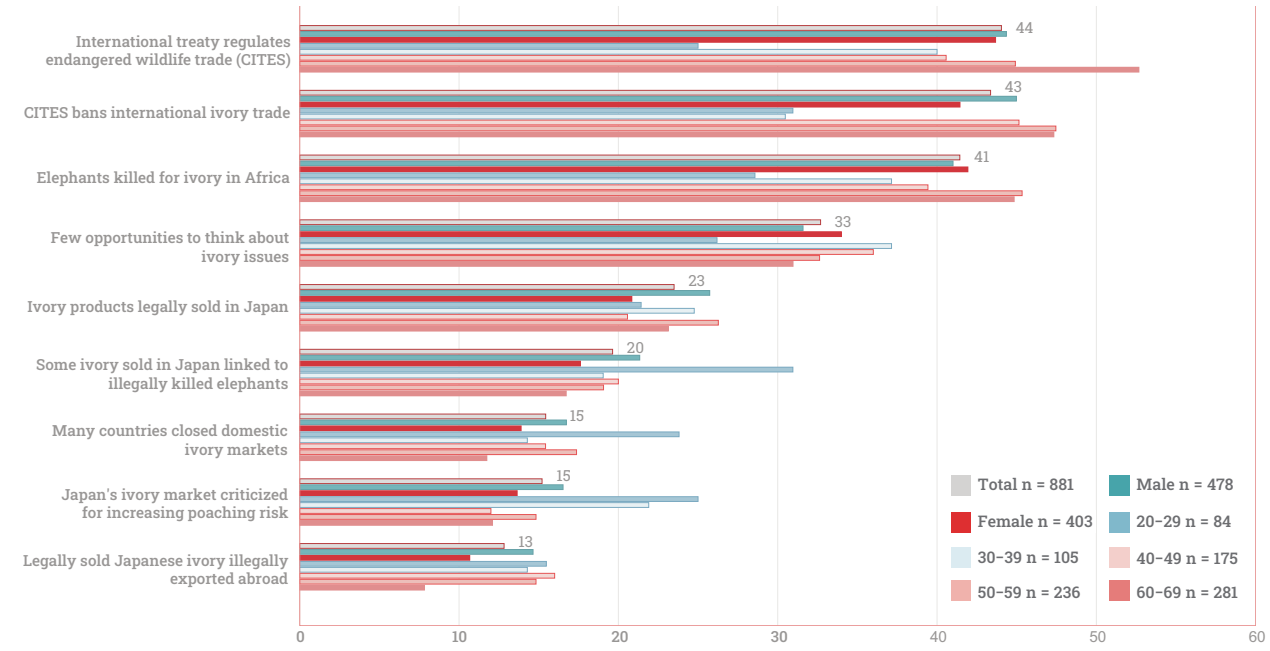
- **73%** of respondents said they had no interest in purchasing ivory products
- **56%** of respondents said they did not know what ivory was
- Only **18%** of respondents confirmed owning ivory products
- Only **23%** of respondents knew ivory products are still legally sold in Japan
- Only **13%**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

Figure 2: **Awareness of ivory**



Base: Total respondents, n = 2,000. Values are percentages.

Figure 3: **Awareness of ivory-related issues**



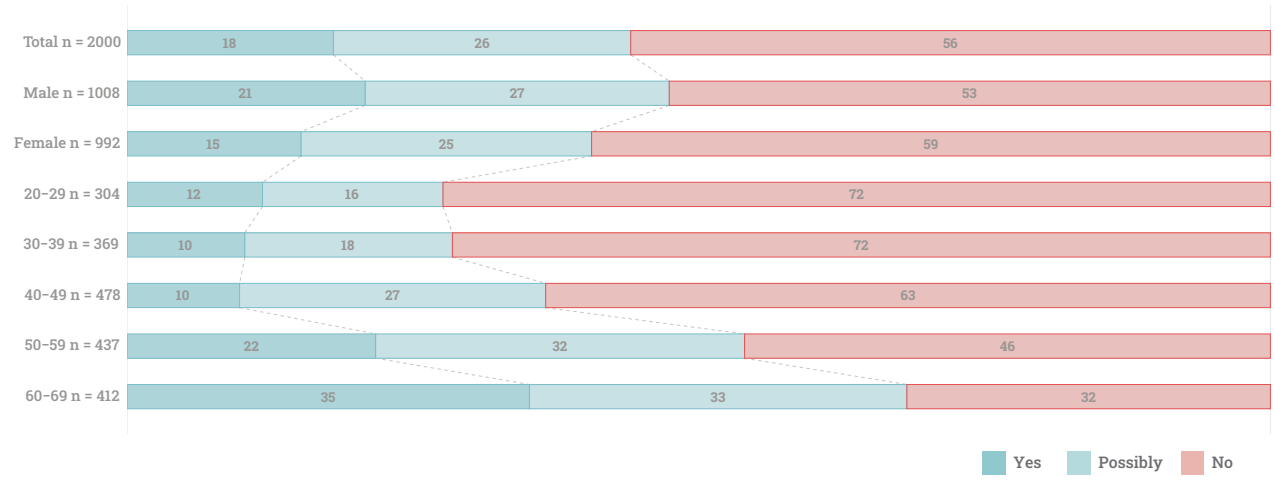
Base: Those who know what ivory is, n = 881. Values are percentages.

28% of respondents in their 20s saying they were familiar with ivory, compared to 68% of respondents in their 60s.

Knowledge of Japan's continuing role in the ivory trade was even lower (see Figure 3). Among respondents familiar with ivory, only 23% knew ivory products are still legally sold in Japan. Awareness of broader ivory-related issues, including international trade restrictions and Japan's role in the global market, remained consistently limited across the dataset. Just 13% were aware that legally sold Japanese ivory has been illegally exported abroad.

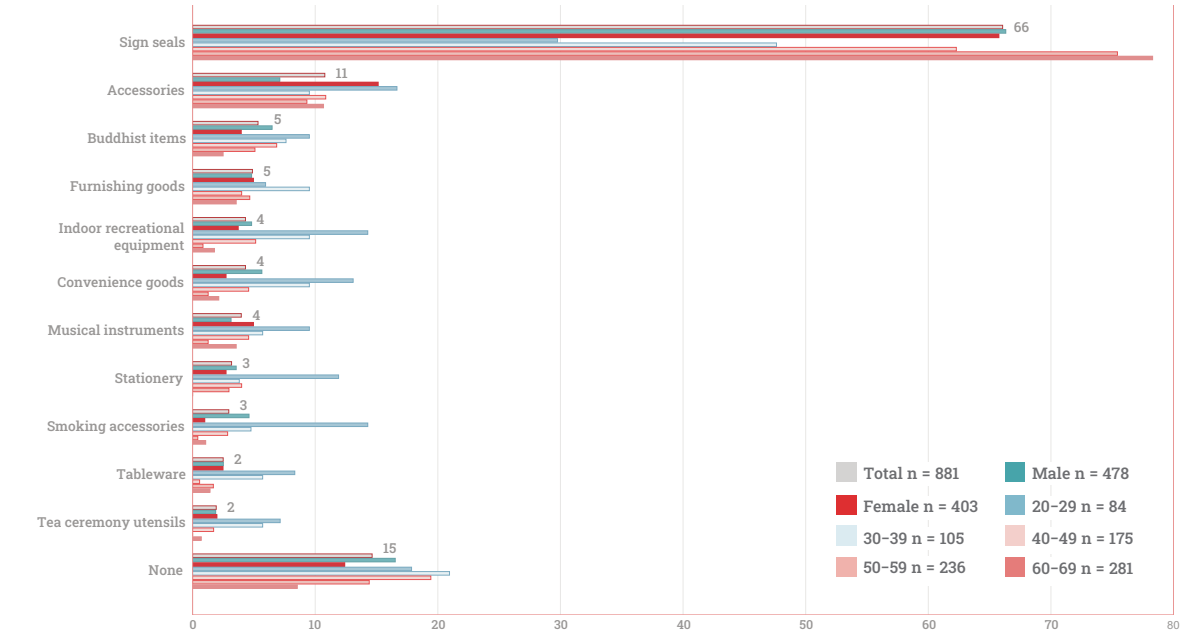
Together, the findings suggest Japan's domestic ivory market operates with remarkably little public awareness or scrutiny. Even among respondents familiar with ivory, knowledge of Japan's legal trade and its links to illegal exports remains limited. Rather than existing as a visible or actively debated part of public life, the market

Figure 4: **Ownership of ivory products**



Base: Total respondents, n = 2,000. Values are percentages.

Figure 5: **Ivory products owned**



Base: Respondents who own or possibly own ivory products, n = 881. Values are percentages.

appears to persist largely outside mainstream public consciousness.

Ownership and Consumer Attitudes

Ownership of ivory products appears limited and heavily concentrated among older age groups (see Figure 4). Only 18% of respondents confirmed owning ivory products, with ownership rising to 35% among respondents in their 60s but falling to just 10-12% among those under 50. Among ivory owners, 66% own only a *hanko* (name seal), while ownership of all other ivory items remains comparatively rare (see Figure 5). Many of these products also appear to have little continuing relevance in daily life: 25% of ivory owners said they no longer used any ivory products at all (see Figure 6).

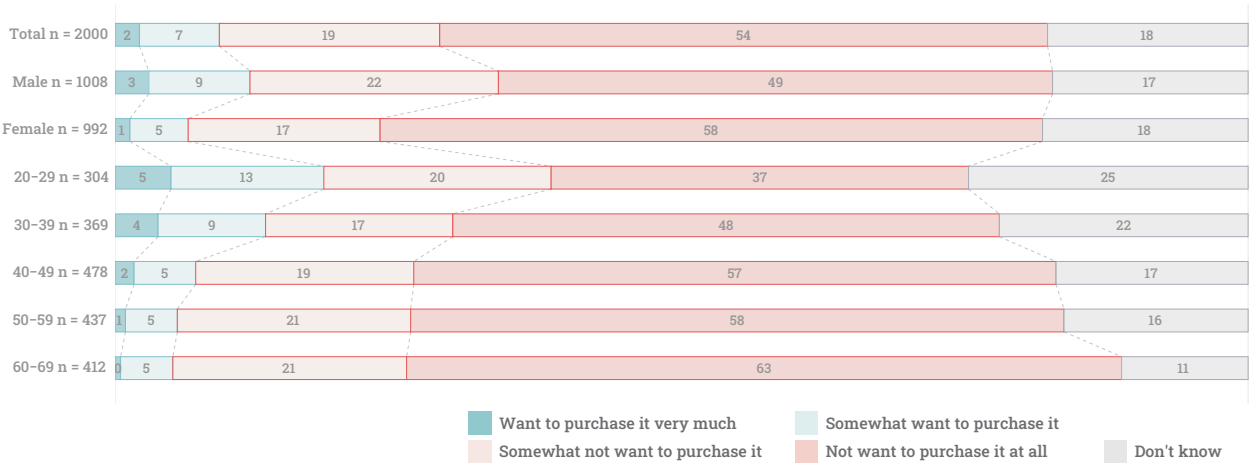
Future demand appears even weaker: 73% of respondents said they had no interest in purchasing ivory products in

Figure 6: **Ivory products used**



Base: Those owning specific ivory products, n = 752. Values are percentages.

Figure 7: **Purchase intention of ivory products**



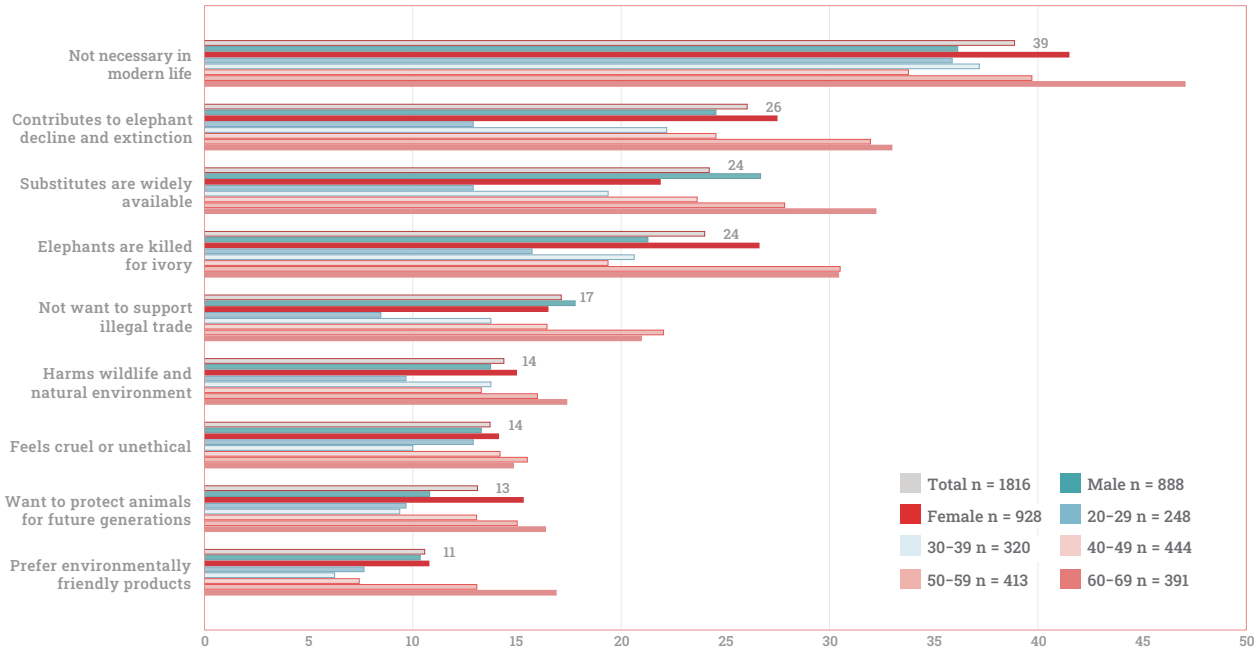
Base: Total respondents, n = 2,000. Values are percentages.

the future, while only 9% expressed any interest in buying ivory (see Figure 7).

Among respondents who said they did not want to purchase ivory products, 39% said ivory is no longer necessary in modern life, while 26% cited concerns about elephant decline (see Figure 8). A further 24% pointed to the availability of adequate substitutes, and 24% said they did not want to buy products made from elephants killed for ivory (multiple answers allowed).

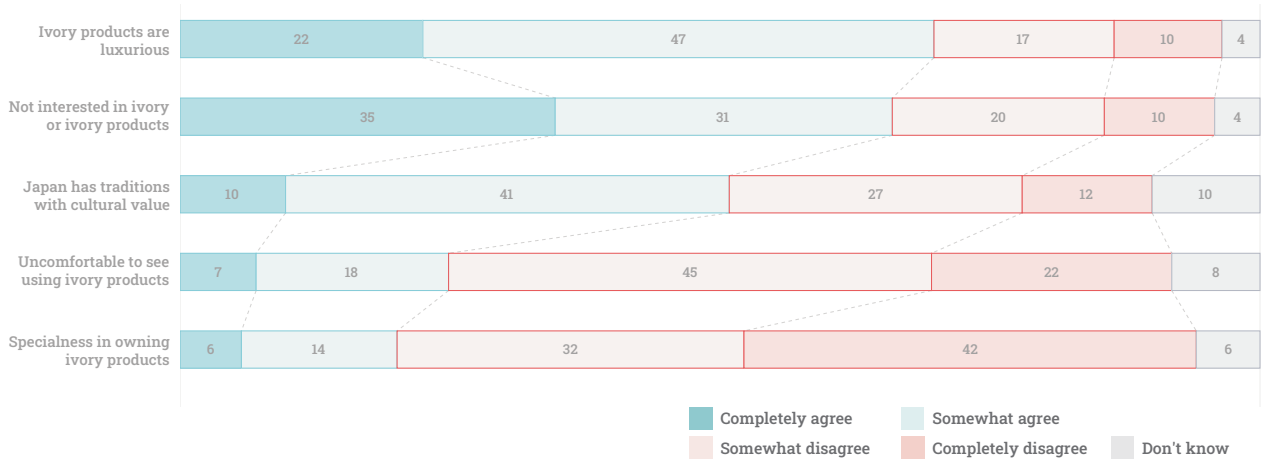
These results correlate with those of a recent online survey undertaken by the Japan Wildlife Conservation Society, in which 88% of respondents said they did not plan to purchase ivory.[5] In their study, the focus was on assessing the demand for ivory and interest in ivory

Figure 8: **Purchase intention of ivory products**



Base: Respondents expressing no purchase interest or answering 'Don't know', n = 1,816. Multiple answers allowed. Values are percentages.

Figure 9: **Cultural esteem ≠ Consumer demand**



Base: Those who know what ivory is, n = 881. Values are percentages.

alternatives, particularly for musical instruments, in advance of a traditional music event promoting using alternatives to ivory.[6]

Among respondents familiar with ivory, 69% described ivory products as luxurious and 51% said Japan's ivory traditions still held cultural value (see Figure 9). However, these views did not translate into strong consumer interest. Two-thirds said they were not interested in ivory themselves, and only 20% felt there was anything particularly special about owning it. The findings suggest that while ivory may retain symbolic or cultural associations, these no longer translate into meaningful consumer demand.

The findings suggest Japan's domestic ivory market is not supported by broad consumer demand or everyday use. Ownership is limited largely to *hanko*, while interest in future ivory purchases remains extremely low across the population. Although some respondents continued to associate ivory with cultural value or luxury, these views appeared to rarely translate into personal interest in owning or purchasing ivory products.

JAPAN'S IVORY MARKET: A LOOK AT THE RETAIL INDUSTRY

To sell ivory in Japan, a retailer must be registered as a "Special International Species Business Operator."[7] Registration must be renewed every five years, and the registration is outsourced to the Japan Wildlife Research Center (JWRC). As stated on the website, "The system related to the Special International Species Program is designed to regulate and manage the domestic trade of ivory products."

In 2018, when the registration program first began, 13,239 ivory traders, including retailers, wholesalers, and manufacturers, registered to trade in ivory. Following the implementation of the new law starting June 1, 2018, the traders, who had notified their businesses to the authorities based on the old law, were permitted to continue their businesses without the registration procedure for one and half or three years. As the result of these transitional measures, a significant number of ivory retailers were set to have their registration renewal slated for May 2021, and then in May 2026—five years later.

The number of registered dealers has changed dramatically since the requirement was first implemented.[8] In July 2020, there were 16,175 ivory trading facilities managed by 12,909 registered ivory dealers across the country. As of October 5, 2021, after the May 2021 renewal, there were 5,692 registered traders operating 8,322 facilities engaged in the ivory trade business. After the most recent deadline (May 31, 2026), when a significant number of businesses reached their renewal date, the number of registered businesses fell from 5,534 in May to 4,476 in June, a 19.1% decrease.

Businesses that did not apply for renewal are no longer eligible to sell ivory products. Considering the number of registered traders has significantly declined, it can be assumed that businesses determined that the cost of registration does not justify maintaining the license for limited sales in ivory and opted not to register. Trading ivory without registration is illegal and thus subject to penalties such as fines and imprisonment.

Notably, in recent years some major e-commerce and brick-and-mortar stores elected to implement policies to cease sales of ivory. Rakuten, Yahoo! Japan, Mercari Inc., and Ito Yokado all banned ivory sales, and the major Japanese retailer company AEON no longer allows tenants in its malls to sell ivory products.[9] In lieu of government action, these companies withdrew from participating in the domestic market. As a result, the potential for ivory purchased on their platforms to be illegally exported was reduced.

Below: Ivory hanko on sale in a Tokyo hanko shop.



Source: EIA



Source: EIA

Government Surveys Provide Additional Insights into the Declining Ivory Industry

The ivory industry has consistently been supported by government entities in Japan. The national and Tokyo-level governments provided subsidies to ivory industry stakeholders to support traders even after the international ban on ivory trade went into effect.[10] While the national subsidies ended in 2017, the Tokyo Metropolitan Government continued subsidies for ivory traders until at least 2025, even supporting efforts to generate demand for ivory and lobby for international trade to be reopened at CITES meetings until as recently as 2024.[11] Moreover, a Japanese government-led "Public-Private Council for the Promotion of Appropriate Ivory Trade Measures" was established to ensure the continuation of Japan's domestic ivory trade, advocating the 'appropriateness' of the existing trade controls.[12]

There have been government-led surveys of ivory retailers within the past decade to gauge retailer perspectives on ivory trade and reliance, including one in 2020/2021 by the Tokyo Metropolitan Government (TMG),[13] and one undertaken in 2025 by the Ministry of Economy Trade and Industry (METI).[14] TMG surveyed 1,319 registered ivory businesses in Tokyo in 2020 (54.4% response rate) and 1,159 businesses in 2021 (58.6% response rate). METI followed with a national survey of 5,705 businesses in 2025, receiving just 377 responses (6.6%). The surveys vary in scope, with the TMG surveys covering Tokyo businesses only, while the METI 2025 survey was national. TMG achieved a far higher response rate, and its respondents were more representative of the largest group of retail-heavy traders, making its averages a more reliable baseline. The low response rate from the METI survey might reflect disengagement from regulatory oversight, and results reflect more responses from manufacturers than predominantly retailers, inflating some averages. Therefore, these limited data are less reliable but still relevant.

The results indicate that a significant share of registered businesses is not actively trading ivory. TMG's survey in 2021 found that 38% of respondents were not dealing in ivory at all, compared to 24% in METI's survey. In the METI survey, nearly one-third of those still registered said they were renewing primarily because it is cheaper than letting the registration lapse and then re-registering.[15]

For businesses that are trading, ivory is a small part of what they sell. TMG's 2021 survey found the revenue from ivory accounted for less than 1% of total revenue for 52.3% of the respondents, with wholesalers and retailers averaging just JPY 430,000 in annual sales, compared to an average of 9.78% of revenue and JPY 957,878 in the METI survey results.[16] Of those that responded, the market's main products are almost exclusively *hanko*, accounting for 46% of wholesale and retail activity in the

Above: Sign outside the Tokyo Ivory Arts and Crafts Association office.

JAPAN'S IVORY STOCKPILE AND TRADE CONTROLS

Japan reports to have a 250-tonne, privately held ivory stockpile available for its domestic market, which includes whole tusks that are registered with the government and cut pieces that are reported from the registered ivory businesses to the government.[19]

The stockpile records are made available by the Government of Japan via publicly available reports under CITES.[20] The figure does not include unregistered whole tusks, and any and every cut piece in private possession by citizens throughout Japan.

Japan's ivory trade controls are designed to facilitate trade, not to closely monitor the movement of ivory. The disjointed tracking system cannot ensure traceability of ivory from whole tusk to worked product because there are many loopholes and gaps in the system. Only whole tusks are mandated to be registered with the government, and this is the only stage at which ivory's legal origin and acquisition is validated. Cut pieces of ivory are not registered, so the registration requirement can be easily avoided by cutting up raw tusks. Registered business operators must create "traceability information forms" for cut pieces when they get new cut pieces by cutting ivory as of June 2018, but this tracking is separate from the whole tusk system. Additionally, most worked ivory items in Japan (like *hanko*) are small and do not meet the requirements (over 1 kg in weight and 20 cm in length) for the mandatory traceability information forms.

The reality is that it is impossible to trace ivory sourced from a whole tusk that is processed into various worked products. Thus, there are many opportunities for illegal ivory to be laundered onto the market. The government appears to operate on the assumption that most ivory was imported in whole tusk form prior to the ban on international trade, so that simply regulating whole tusks is sufficient to prevent illegal activity or an influx of illegal ivory onto the legal market. Japan records ivory entering the legal market as if it maintains its whole tusk shape, but what happens afterward is tracked with far less rigor as ivory ages in stockpile, changes hands, is cut into pieces, processed, and reaches the market as finished products. Each step adds distance between the physical ivory and the paperwork meant to account for it. Japan's ivory traceability is riddled with systematic gaps that make it virtually impossible to trace the source of ivory once it is moving downstream.

Below: Cut whole tusk at a Japanese ivory shop.



Source: EIA



Source: Photo originates from a 2025 press conference hosted by the Tokyo Metropolitan Police Department.

2021 TMG survey and 42% of all respondents in the METI survey. Accessories, musical instruments, and furnishings comprised the remainder by a significant margin. Among businesses producing ivory goods, TMG found 65% were manufacturing *hanko*.

Though responses were limited, particularly in the most recent survey by METI, the results suggest that retailers' reliance on ivory is limited. Most registered ivory businesses are barely selling ivory and most of those that continue to do so are concentrated in *hanko*.

Given limited demand from consumers, and limited reliance on ivory by the bulk of retailers, who are more predominant in the ivory sector, it seems the ivory industry stakeholders that benefit from government policies are few. These stakeholders, including ivory *hanko* manufacturers, a handful of retailers specializing in *hanko* and related products, operating on a significant scale, tend to be members of the Japan Federation of Ivory Arts and Crafts Associations or an affiliate group,[17] or the Japanese Seal Engraving Association.[18] *Hanko* industry stakeholders advocate for the continued use of ivory and provide guidance to retailers and commentary on the actions of the government and CITES meetings.

SYSTEM ABUSE AND ILLEGAL EXPORT

Given limited Japanese consumer demand, it is difficult to believe that this huge ivory market exists to meet the actual demand for average Japanese citizen consumers. With abundant loopholes in the domestic trade controls, and limited border enforcement, the regulations are being circumvented and abused by criminals seeking to take advantage of Japan's readily available legal supply of ivory – likely with the intent to supply the demand in other countries.

Given the current realities of trade regulations, the onus is ultimately on retailers to monitor and prevent illegal trade and export. An existing public awareness raising campaign by the authorities[21] targeting retailers and consumers exists which informs them of the illegality of export and functions to inform those who might not know of the export ban; however, it does not function to prevent intentional illegal activity. A previous investigation by JTEF and EIA revealed that many

Above: Illegal ivory confiscated during the arrest of Daigo Ivory representatives for illegally selling elephant ivory as mammoth ivory on an e-commerce platform. They later pleaded guilty.

retailers were willing to sell ivory to consumers who voiced intent to take it abroad.[22] The government's awareness campaign only serves to dissuade those from unintentionally breaking the law, but for criminals intent on breaking the law to profit, such campaigns are useless.

Some major retailers, like Yahoo! Japan, ceased ivory sales on their platforms to reduce the risk that ivory purchased there could be illegally exported. In 2025, representatives from Daigo Ivory, a leading ivory manufacturer and retailer and a member of Tokyo Ivory Arts and Crafts Association (at the time of the incident), were arrested and prosecuted, and pleaded guilty to intentionally sell elephant ivory fraudulently advertised as mammoth ivory, circumventing Yahoo! Japan's policies.[23] Following the case, Yahoo tightened its own policies, but as long as ivory can be legally sold, it will be challenging to enforce its own policy and keep ivory off its platform to avoid the risk of illegal export.[24]

International seizure data aggregates from the CITES Elephant Trade Information System (ETIS) show that there were 321 ivory seizures (3.6 tonnes) connected to Japan between 2008 and 2025. Of those seizures, 267 out of 321 seizures (83%) and 3,022 out of 3,634kg (83%) were reportedly made outside of Japan. In a 2025 report for the 20th Conference of the Parties to CITES, Japan was linked to an estimated 10% of China's worked ivory seizures, and China appeared along the global trade chain in 56% of worked ivory seizures.[25]

In early 2026, the Tokyo Metropolitan Police Department arrested individuals for violating the Act on Conservation of Endangered Species of Wild Fauna and Flora (ACES), by advertising and selling unregistered whole ivory tusks, with one suspect intent to illegally export the tusk to Thailand.[26] In 2023, a sea freight shipment reportedly destined for Thailand contained 710 worked pieces of ivory from Japan that were seized.[27]

These select cases highlight that more attention is needed to deter and prevent ivory from being illegally exported. If the government really wants to maintain the legal market, the ACES and its enforcement must be significantly strengthened, including with revised domestic trade regulations and special measures to prevent illegal export, and with more diligent monitoring of business transactions and records.

Below: Ivory *hanko* on sale in a Tokyo hanko shop.



Source: EIA



ANALYSIS AND CONCLUSIONS

The consumer survey results and the insight from the retail sector based on government survey results and market data paint a consistent picture: ivory use and trade in Japan today are minimal. In Japan, the ivory market is retail-driven and the public demand for ivory is weak.

Most retailers sell ivory together with other goods and do not depend on income from ivory sales for their business continuity and livelihoods. Unfortunately, Japan is as an easy source of ivory for criminals looking to profit through illegal ivory trade or tourists seeking to acquire items that are illegal in their home countries. Given this complete picture, the government's obstinate efforts to hold onto the legal ivory market suggest its ivory policies are out of step with public sentiment and market realities.

Choosing to retain a legal ivory market sends a signal to the entire world of support for maintaining demand and restarting international ivory trade. At CITES meetings, Japan consistently aligns with southern African countries that want to sell their ivory stockpiles instead of those that endorse market closure to best protect their small populations of savanna and forest elephants from poaching.

The survey results indicate that there is not an active public demand for ivory. With that in mind, prohibiting domestic ivory trade is the pragmatic option. Given the results, it is likely that the general Japanese public would not be opposed to Japan closing, or nearly closing, its domestic ivory market. The prevailing government narrative that Japan's domestic ivory market must be maintained is simply out of sync with modern life in Japan.



RECOMMENDATIONS

For the Government of Japan and Japanese Local Governments:

- Implement legislative changes that close Japan's domestic ivory market, with the potential for specific, limited exemptions

- To reduce the risk of illegal trade and export, pending the implementation of the legal closure process, institute the following regulations to restrict trade and monitor activity:

  - Expand the range of ivory eligible for registration
  - Expand the range of ivory for which traceability forms are required
  - Prohibit ivory businesses from taking ivory without a traceability form
  - Improve monitoring and enforcement of compliance with ivory registration and traceability form requirements
  - Implement a requirement for ivory businesses to report on ivory tusk transactions
  - Implement mandatory protocols for ivory businesses (including e-commerce) to confirm that purchasers do not intend to export

- Permanently end any existing subsidies and refrain from issuing any new subsidies in the future at every level of government that support maintaining the ivory industry

- Disband the "Public-Private Council for the Promotion of Appropriate Ivory Trade Measures," a government-led initiative established to support continuing ivory trade

For Ivory Industry Stakeholders:

- Cease manufacturing new worked ivory products
- Phase-out ivory product sales and instead offer viable alternatives
- Withdraw from the "Public-Private Council for the Promotion of Appropriate Ivory Trade Measures"
- Continue to cooperate with the Government of Japan and Japanese local governments to prevent illegal ivory trade and exports

For the Public:

- Do not buy elephant ivory products
- Do not shop at stores that sell ivory products
- Learn more about elephants and Japan's role in the ivory trade
- Encourage your government representatives to tighten the regulations on ivory trade and close the domestic market

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15. This might suggest that their current sales were sluggish while they expected some future sales.
16. This is likely skewed by the manufacturer-heavy sample, as manufacturers engaged in ivory carving tend to conduct business activities that are more specialized in ivory compared to wholesalers and retailers; consequently, their figures appear comparatively inflated overall.
17. The Japan Federation of Ivory Art and Craft Associations comprises the Tokyo Ivory Art and Craft Association (consisting of 14 businesses; https://tokyo-ivory.jp/), which is under the jurisdiction of the Tokyo Metropolitan Government, and the Osaka Ivory Art and Craft Association, which is under the jurisdiction of Osaka Prefecture. However, the Osaka Association does not appear on the list of business cooperatives published by Osaka Prefecture (as of August 1, 2025, listing 1,419 cooperatives;
https://www.pref.osaka.lg.jp/documents/56692/kumiaimeibo.pdf), suggesting it may have already been dissolved as a formal business cooperative.
18. The membership of the Japanese Seal Engraving Association stood at 947 in November 2019 but has since declined to 671 as of November 2025 (as per the Association's website: https://www.inshou.or.jp/inshou/store/index.html). The Association had 3,418 members in 1998 (Gendai Insyo, November 1998 issue).
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