

**How China's illegal ivory trade is causing
a 21st century African elephant disaster**



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INTRODUCTION

China has the largest illegal ivory trade of any nation in the world. It is the most significant global destination for illegal ivory. Ivory traders are now thought to be stockpiling elephant tusks and ivory products for lucrative sales to the hundreds of thousands of foreigners expected to attend the Beijing Olympics in the summer of 2008. China's long failure to crack down on its massive illegal ivory trade makes a mockery of its claims to be hosting a "Green Olympics".

Chinese nationals, companies – some government owned – and organized crime syndicates are implicated in the smuggling of vast amounts of illegal ivory and the consequent elephant poaching afflicting much of Africa. Countries affected include Sudan, Central African Republic, Democratic Republic of Congo, Chad, Kenya, Tanzania, Zimbabwe, Zambia, Malawi, Mozambique, Nigeria, Cameroon, and Mali. Indications suggest that Chinese involvement in illegal ivory trade extends to other African elephant range states as well. With Chinese investment and human presence in resource extraction operations across Africa skyrocketing, demand for ivory will overwhelm the ability of range states to conserve their elephants from poaching gangs connected to Chinese ivory buyers, often in collusion with corrupt government officials.

China's massive illegal ivory trade is not an accident. Failure by the Government of China to ensure meaningful enforcement of CITES regulations that prohibit the import and export of ivory resulted in illegal ivory flooding onto the domestic market in the 1990's. China's demand for ivory is directly responsible for the renewed poaching crisis facing many African elephant populations, as this report shows.

After CITES increased protection for Africa's rapidly disappearing elephants by banning international trade in ivory products in 1989, China neglected to fully enshrine those legal protections in domestic law for 17 years. Over that period its government did little to enforce CITES regulations prohibiting ivory imports or exports.

Major failures included a vast loophole enabling traders to register ivory which they had "forgotten" to register at the time of the 1989 CITES ban as "pre-convention", in effect enabling smuggled ivory to be legalized and then moved onto China's flourishing domestic market.

Illegal ivory seized by Chinese government agencies is also alleged to have disappeared into government ivory stocks. Numerous traders have confirmed that government ivory stocks continued to be sold to them in the 1990's and 2000's, including via government owned companies. Even the ruling Communist Party of China is reported to have held ivory stocks which were sold to traders.

Organized smuggling syndicates have proliferated across Africa in recent years as Chinese companies and nationals pour into the continent, extracting its rich resources to fuel the explosive growth in manufacturing on the Chinese mainland. Whether working for oil companies in Sudan and Angola, or logging companies in west and central Africa, some Chinese nationals are tempted into working for the lucrative underground ivory trade.

Africa's elephants are paying the price for China's failure to enforce the CITES ban. Recent commendable efforts by China's government to suppress the illegal ivory trade have resulted in some high-profile seizures as well as restrictions on ivory product sales. Yet the government has now legalized dozens of companies thought to be implicated in illicit trade. Further, it undermines its own efforts to crack down on illegal trade by auctioning off confiscated poached ivory to domestic traders. Worse, China is now seeking legal approval from CITES to take part in future ivory auctions in order to expand its domestic trade.

The Chinese government's determination to host a "Green Olympics" in 2008 will be badly tainted if it continues to protect a domestic ivory trade that is fueling widespread poaching and illegal trade across several continents. The country's very belated efforts to ratchet up enforcement operations against large-scale smuggling and commercial trade in ivory are not enough to prevent a 21st century African elephant disaster, driven by Chinese consumer demand.

Instead the Government of China can affirm its commitment to CITES and to protecting endangered species by taking immediate action to ban the domestic trade in ivory. By simplifying enforcement procedures and empowering enforcement personnel across the nation, ivory trade can be eliminated within China's borders.

A precedent already exists. In 1993 China banned domestic rhino horn trade after rhino poaching in Africa and Asia and the flow of horns to China had reached crisis levels. China's successful action to save the world's rhinos demonstrated high level political will to protect the wildlife of other nations.

Today, China's people face two key questions with regard to another beloved endangered species: the African elephant. First, where does all the ivory in China come from, almost 18 years after international trade was banned? And second, does the Government of China have the political will to ban the domestic ivory trade that is helping to push many African elephant populations towards extinction?

Allan Thornton
May 16, 2007

CHINA'S FAILURE TO ADDRESS THE ILLEGAL IVORY TRADE

© Kenyan Wildlife Service



LEFT: *Elephants poached for their ivory in Kenya, 2002.*

BELOW RIGHT: *The 5.6 tons of tusks seized in Singapore, 2002, was one of at least 19 similarly sized shipments from a crime syndicate in Malawi controlled by Hong Kong nationals. At least four previous ivory shipments had been sent to China.*

In October 1989, in recognition of the rapid decline in many elephant populations across their African range, the Parties to CITES voted to place African elephants on its Appendix 1, thereby prohibiting most international trade in ivory and other elephant parts and products. The People's Republic of China lodged a reservation to the CITES Appendix 1 listing of the African elephant. The listing came into effect in January 1990. China maintained its reservation for a full year, finally withdrawing it on January 11, 1991.

Since that date, China has not been permitted to legally import elephant ivory. However, for the past 16 years, ivory has been widely available in China through many dozens of government sanctioned ivory traders, manufacturers and retailers. Today ivory products are still commonly found and carving factories continue to produce new items. Where has all this ivory come from?

Prior to the CITES ban on international trade in African elephant ivory, two Chinese government owned companies – the China National Arts and Crafts Import Export Corporation (CNACIEC) of the Ministry of Foreign Trade, and the National Arts and Crafts Company of the Ministry of Light Industry – were exclusively authorized to import and export ivory, and also controlled government-run ivory processing companies.¹ By 1989 several private companies had also been authorized to import and export ivory.²

At the time of the ban, extant ivory stockpiles were limited and China's enforcement of CITES regulations on ivory was very weak. Throughout the 1990's, new privately-run carving and ivory distribution operations emerged and flourished, unchecked by Chinese enforcement authorities. These private companies exploited major loopholes in China's laws related to the interpretation of "pre-convention" ivory (see page 3, "China's legal loopholes") to import and export illegal ivory prohibited under the CITES regulations.

Substantial evidence confirms that large amounts of ivory continued to be exported from, and imported into, China throughout the 1990s and into the 2000s by both private and government importers and traders. In 1990, China reported the export of almost 9,500,000 ivory carvings, while in 1991, additional exports were allowed for 1,003,351 ivory carvings.³ In 1992, 566 raw tusks were exported, most of them claimed as "pre-convention" stocks.⁴

In 2000, EIA undercover investigators visited China and Hong Kong and discovered plentiful supplies of ivory available both from new privately owned companies and older government-controlled companies. The private companies were flourishing by supplying domestic distributors feeding a growing demand for ivory, as well as exporters supplying Japan, Korea, Taiwan, Singapore, Italy, France and the UK.⁵

1999 – 2000: EIA Investigations Reveal China's Thriving Illicit Ivory Trade

EIA investigations revealed that:

- Widely exploited loopholes in China's legislation (see page 3) allowed traders to register new ivory as "old" (pre-convention) ivory, under the pretext of having "forgotten" to register their "old" stocks at an earlier point in time.⁶
- Ivory carving factories DaXin and the Beijing Carving Factory stated they were able to acquire export permits through their involvement with Beijing Gongmei, a company operated by the China National Arts and Crafts Import Export Corporation,⁷ which is owned in turn by the Chinese Ministry of Foreign Trade.⁸
- The government owned Beijing Gongmei also admitted to EIA's undercover investigators that they received government export permits for ivory shipments to Japan.
- The Leung Fat carving factory in Zhouhai admitted to exporting ivory to Japan, Singapore, France, Italy, UK and Holland.
- The Ngai Gong factory admitted to shipping ivory to Korea, and one Guangdong shop admitted trading ivory to Taiwan.
- Yueh Ya, a thriving operation in 2000, was set up in 1990, after the CITES ban came into effect, and claimed one carving factory in Guangzhou with 35 carvers and another in Beijing to feed a growing local market. They had three shops in Guangzhou and provided substantial amounts of ivory carvings to government Friendship Stores.
- Yueh Ya's owner stated that the Guangzhou government had licensed them to export ivory to Japan the previous year. For pieces valued from US\$100,000 to \$1 million, an official in the provincial government would arrange an export license. He boasted that "90% of our [ivory] items are new."
- Yueh Ya's Guangzhou office held many costly carvings, which they offered to deliver to Hong Kong for collection. Ivory carvings ten inches or smaller could be selected at their Guangzhou shop and picked up by the buyer in Hong Kong.
- The Guangzhou Friendship Store featured a section dedicated to ivory products, while at least six shops dedicated to retail ivory sales operated in central Guangzhou.
- Other Guangzhou retail outlets including hotel shops catering to tourists, offered a wide range of ivory products from bangles, necklaces, and signature seals, to intricately carved balls, large figures, and whole carved tusks.
- In Beijing, both the Friendship Store and the Beijing Arts and Crafts Store offered a wide array of ivory products.⁹



CHINA'S LEGISLATIVE LOOPHOLES

Significant loopholes in China's domestic legislation enabled traders and government owned companies to import and export ivory illegally:

The "Pre-Convention" Loophole

Under CITES, "pre-convention" refers to ivory imported into China prior to its 1981 accession to CITES. China allowed ivory purchased prior to the CITES ban in 1989 to be included in the "pre-convention" category,¹⁰ thereby allowing trade in ivory prohibited under CITES regulations to be legally traded domestically, as well as to be exported.

China also allowed ivory to be retroactively categorized as "pre-convention" ivory. The "pre-convention" loophole therefore allowed substantial ivory exports and imports to continue, in violation of CITES.¹¹

Numerous traders confirmed to EIA that it was easy both to acquire government permits to export ivory – especially for large volumes – as well as to register new (i.e. illegal) ivory as "old ivory" (i.e. under the "pre-convention" exemption) merely by claiming to have forgotten to register such stocks in the past.¹²

The Non-Native Classification Loophole

China's Wild Animal Protection Law (WAPL) was enacted on March 1, 1989 and classified native Chinese species as Class 1. However, non-native CITES-listed Appendix 1 species, such as the African elephant, were not categorized as Class 1 species until April 14, 1993.¹³ The WAPL provided that:

1. The Sale or purchase of Class I state protected wildlife or their products is strictly prohibited, **although those stocks acquired before listing in this category are exempted, And;** [emphasis added]

2. The export or import of State protected wildlife and/or their products, whose trade is also restricted by international conventions to which China is a contracting Party, must be approved by wildlife authorities under the State Council or by the State council itself. **Import or export permits must then be obtained from the relevant state administrative department.**¹⁴ [emphasis added]

It was not until May 2004 that the State Forestry Administration initiated a scheme requiring companies to register to sell, process and/or trade ivory.¹⁵ And it was not until September 1, 2006, that "The Regulation of the People's Republic of China on the Administration of the Import and Export of Endangered Wild Fauna and Flora" came into effect. This provided the legislative basis to close the loopholes, almost 17 years after CITES placed African elephants on its Appendix 1.¹⁶

Articles 24, 25 and 27 of this statute criminalize the illegal issuance of import and export permits by state officials. Article 26 provides that confiscated products "shall be transferred by the administrative department of wild fauna and flora to the state administrative organ in charge of the import and export of endangered species for disposal according to the relevant provisions of the Convention." Article 15 of the new regulation prohibits bribery by outlawing "collection of any other fee other than fees proscribed by the state."¹⁷



ABOVE: Ivory room at the Dalian New Friendship Store, Dalian, China, May 2007. 17 years after the ivory ban: Where does all the ivory come from?

INCREASING IVORY STOCKS (1989-2002)

International Ban, Increasing Stocks?

China's failure to prevent imports and exports of ivory prohibited under CITES regulations enabled a continuing flow of illegal ivory onto its domestic market and the accumulation of large ivory stockpiles. Large discrepancies in reported figures for ivory stocks reflect the ease with which substantial ivory stocks have been imported into China either with government permits or through widespread smuggling since the ban.

Prior to the ivory ban, China imported an average of 32 tons of ivory annually from 1980 to 1990. In 1989, China's raw ivory stocks were estimated to be 50 tons, but in 1990 over 200 metric tons were reported to exist, most of it worked ivory. Unspecified amounts of worked ivory were said to be held in retail outlets.¹⁸

In 1990, China reported the export of almost 9,500,000 ivory carvings, and in 1991, additional exports were allowed for 1,003,351 ivory carvings. In 1992, 566 raw tusks were exported, most of them claimed as "pre-convention" stocks.¹⁹ Wildlife trade specialists Bradley Martin and Dan Stiles found that "Given the estimated stocks in 1990 of 200 tons of raw and worked ivory and the enormous exports (in 1990, 1991 and 1992) this should have more than emptied the storerooms."²⁰

Da Xin, the largest and best known ivory carving factory in China, provides a clear example:

- In early 1989 Da Xin, admitted to having only one ton of ivory in stock, though it had processed 10 tons that year and registered 20-30 tons of raw ivory with the CITES

Management Authority, Da Xin obtained its raw ivory from government owned companies authorized to import ivory.²¹

- In 1990, Da Xin claimed it had 50 tons of raw ivory, though the amount is not recorded in official import records. By 1997, Da Xin claimed to have a stock of 20 tons of ivory. A leading international ivory trade expert stated that the ivory could only have originated from illicit supplies.²²
- In 2000 Da Xin claimed to EIA undercover investigators they were still using the one ton of ivory from 1989 and that 17 to 18 tons of worked ivory still remained.²³
- In late 2002, Da Xin declared to the Chinese Government that it held 11.5 tons of raw and worked ivory. (A Da Xin manager told EIA that the carving factory is supplied with government ivory stocks.)²⁴
- By 2002, a Chinese government survey reported that 110 tons of ivory was missing from the government's national ivory stockpile. "This suggested illegal selling had taken place and the government has instigated an investigation," according to Bradley Martin's 2003 report. The survey reported 26.15 metric tons of ivory were held in various government and private stocks, with confiscated ivory amounting to 11,012 pieces of raw and worked ivory both in local and national government departments.²⁵



SEIZED IVORY DISAPPEARING INTO GOVERNMENT STOCKS



© Environmental Investigation Agency

LEFT: Seized ivory, 2000.

In addition to China's failure to properly implement CITES legislation, traders have suggested that ivory seized by government departments often "disappears" into government ivory stocks, to be sold later onto the domestic market.²⁶

Evidence of such ivory disappearances into government stocks began surfacing in the 1990s. One trader explained how he had been called in by customs in Guangdong in 1998 to inspect and value 300 seized ivory tusks, and suggested the tusks had "disappeared" into government ivory stocks. In 2000, ivory traders and representatives of carving operations told EIA investigators that local government stocks were a continuing source for ivory even though such stocks should have been exhausted many years earlier. Other traders also said they received ivory from local government stockpiles.²⁷

Chinese government control over confiscated ivory stocks has been extremely lax, with different government departments operating with overlapping and conflicting responsibilities.

In this regard, a 2002 TRAFFIC study noted: "Customs are responsible for regulating trade across international borders and for the confiscation of illicit commodities, including wildlife (*Customs Law*, Articles 27 & 47). Confiscated items are required to be turned over to the State Treasury (*Customs Law*, Article 52). However, there are no centralized storage facilities for seized ivory either at the provincial or national level. It is unclear whether confiscated ivory is kept in storage, destroyed or released on to the domestic market."²⁸

TRAFFIC estimated that 40 to 50 metric tons of ivory was seized between 1996 and 2002 based on seizure records they had compiled.²⁹ But by 2003, the Chinese CITES Management Authority stated that only 30 tons of seized ivory were in government hands, while private stocks from 'non confiscation sources' amounted to another 30 tons, much of which was said to be "pre-convention".³⁰

Seized ivory disappearing into government stocks may explain, in part, how the Chinese government has been able to continue to provide ivory to manufacturers and retailers across the country.

"It is unclear whether confiscated ivory is kept in storage, destroyed, or released onto the domestic market."

- TRAFFIC, 2002

DOMESTIC TRADE, 2001-2007

2001-2003: Government regulation undermined by smugglers

In 1999, half of all the ivory seized around the world was destined for China, and by 2002 ivory seizures destined for China were soaring. During the same time period, elephant poaching was rising across much of Africa.¹

On June 23rd, 2001, China's State Forestry Administration issued Notification 2001/234, drawing attention to the existing legal instruments and urging all Forestry Departments at the provincial, autonomous region and municipal levels to pay close attention to the smuggling, sale, purchase and transportation of illegal ivory (including ivory products) in China. The Notification also established standardized prices for ivory, enabling illegal activities to be treated as criminal cases.²

At the CITES CoP12 meeting in Chile in 2002, the Elephant Trade Information Service (ETIS) released figures that confirmed China as the major destination for smuggled ivory.³

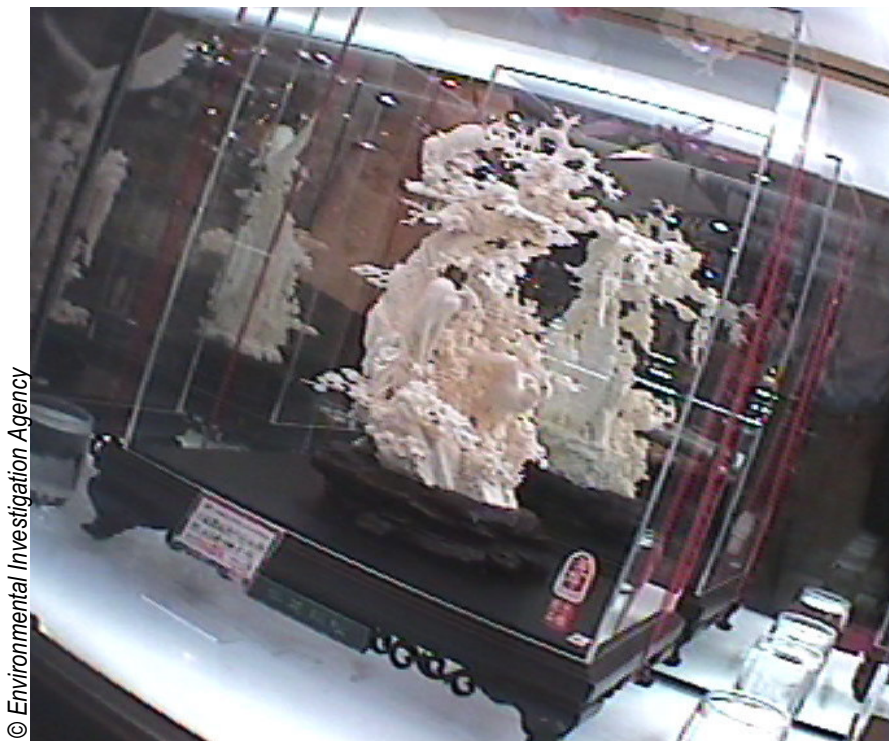
Although between 1999 and 2003 the Chinese authorities made a series of commendable seizures of ivory at the point of import, the retail sector was still allowed to operate without checks or hindrance. There had been no meaningful concerted market inspections since 1989 and it remained impossible to cross-check finished products with supplies of raw ivory. TRAFFIC noted that "China's domestic ivory markets are, for the most part, void of any forms of control or regulation."⁴

In June 2002, EIA conducted a detailed survey of ivory markets in Shanghai, Tianjin, Beijing, Guangzhou and Zhejiang provinces and found widespread availability of an array of ivory products. In Guangzhou and Beijing, EIA observed a great deal of ivory on sale. In addition to display cases of large sculptures and ornaments, many shops possessed significant quantities of smaller ivory products.⁵

EIA observed a clampdown on ivory outlets in central Shanghai and a limited effort to label ivory products in Beijing. Despite these efforts, ivory smuggling was continuing unchecked, according to traders.⁶

During the early 2000s, outlets in Guangzhou had the most ivory displayed and managed carving operations that distributed their products around the country. Hundreds of ivory products were on sale in the Guangzhou Friendship Store, including a carved tusk priced at US\$24,000.⁷

At this time, Yueh Ya appeared to be the largest ivory distributor, owning two of its own ivory shops and supplying the Friendship Stores, department stores and hotels. In the Yu Yuan tourist area, several large stores sold ivory, one indicating that it was new ivory. However, the largest ivory stocks were found at the Shanghai government Friendship Store.⁸



LEFT: High-end ivory carvings and tusks on sale at government owned New Friendship Store in Dalian, China, May 2007. The carving in the top photo is missing the required government certificate.

2002-2003

In 2002, EIA documented the Shanghai Friendship Store displaying large sculptures in a range of cabinets with smaller ivory products in a counter display. Shop assistants described the quick turnover for ivory items and indicated that the carving was done in Shanghai, Suzhou, Guangzhou, Guangdong, and to a lesser extent in Beijing. They explained that their small products were very popular with the Japanese who buy bead earrings, pendants, hanko (name seals), key-holders, chopsticks and mahjong cubes that can easily be carried out of the country. For large items, the store would issue an invoice for export that would satisfy Chinese Customs. As the shop was meant for tourists, the assistant contended they had the right to sell ivory despite a new government registration scheme.⁹

Several stores and stalls were also documented selling hanko, fans and chopsticks. In Jiangsu Province near Shanghai, the Yangzhou Carving Factory used small home factories of 3 to 4 people each, in 10 to 15 operations that sold their carvings at the Yu Yuan market.¹⁰

In 2002, the Beijing Arts and Crafts World Store had a large ivory department with significant quantities of ivory for sale; similarly, the Beijing Friendship Store had one large room set aside for bigger ivory carvings, in which the cheapest sculpture cost US\$604. In Panjiayuan Market, EIA met several companies offering a range of “new” ivory materials. One trader informed EIA of the ease of smuggling ivory through diplomatic channels.¹¹

By November 2003, EIA observed limited improvements, with ivory dealers in Guangzhou and Beijing more aware of government regulations. Availability of ivory had decreased in large hotels and government friendship stores and some traders said ivory could not be exported. However, ivory was easy to find and potential buyers at the Beijing government Friendship Store were encouraged to take ivory products out of the country.¹²

In Guangzhou, dealers were more cautious, but illegal trade was still easily detected. One dealer said he bought illegal ivory from Africa. Boasting of exporting ivory to Japan for the past ten years, he explained in great detail how the ivory was smuggled and stated that “all stocks are from the black market,” and that “all official stocks have been used up.” He explained how they used a smuggler in Hong Kong to deliver ivory abroad. Another shop said it was exporting ivory to Japan, Taiwan, Hong Kong and the US. According to shop attendants, “all kinds of people are buying ivory, including locals and foreigners.”¹³ In early 2004, Chinese authorities raided several shops in Guangzhou and seized 300 kgs of ivory.¹⁴

According to Bradley Martin, co-author of the report “Ivory Markets of East Asia” (2003), “The ivory processed in China in the private workshops today must be for the most part smuggled ivory.”¹⁵



LEFT: Ivory carvings for sale in Beijing hotel room., 2002.

2004-2005

© Environmental Investigation Agency



LEFT: *Poached elephant, Selous Game Reserve, Tanzania, May 2002.*

China's Request for CITES Ivory Trading Status

In May 2004, 15 years after the ban, the Chinese State Forestry Administration enacted a new national ivory registration system requiring ivory, ivory dealers and carvers to be registered.¹⁶ From May 1, 2004, only traders and carving operations registered with the government could sell ivory. All ivory items for sale were to be accompanied by a certificate confirming that the ivory came from a registered stockpile. Pieces valued at more than CNY500 (about US\$63) required a certificate with a photo of the piece. Every registered retail outlet must display an ivory product retail permit issued by the SFA and the State Administration for Industry and Commerce (SAIC).¹⁷

Despite its vast domestic trade in illegal ivory, China applied to CITES in 2005 to become a legally-approved trading partner for any future CITES-endorsed ivory auctions.¹⁸

The SFA scheme was intended to comply with CITES Resolution 10.10 (Rev CoP12) on domestic controls, to ensure that legalized ivory and imported ivory, "will not be re-exported" and will meet 'all requirements' concerning domestic manufacturing and trade.¹⁹

The November 2004 Domestic Auction

In November 2004, authorities in China's Guangdong province auctioned almost a ton of illegal ivory, both raw and worked, to domestic traders.²⁰ Prior to this auction the Chinese authorities had not publicly disclosed that sales of confiscated ivory were occurring.

Also during November 2004 (CoP13), the Parties to CITES prohibited such sales of confiscated specimens from CITES Appendix 1 species.²¹ Traditionally, such sales have been a common scam used by corrupt officials and criminal interests to legalize illicit products for the benefit of the criminals.

To date, the Chinese authorities have not confirmed whether other auctions or sales of confiscated ivory have occurred and, if they have, how much ivory was auctioned and to whom it was sold. Other traders have alleged that the government continued to sell ivory stocks long after official stocks had been exhausted.²² The 2005 CITES Secretariat's Verification Mission to China to assess compliance with CITES ivory regulations reported that: "The subject of disposing of confiscated specimens of Appendix I species was discussed at length with the authorities. The potential negative aspects of such auctions were pointed out. The team recommended, in light of the text adopted at CoP13, that such auctions should not be repeated." The CITES team's report did not specify if China had undertaken other auctions of seized shipments of poached ivory.²³

2005-2007

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ABOVE: Domestic demand for ivory products continues to grow. Ivory room at Dalian New Friendship Store, Dalian, China, 2007.

China: The World's Largest Ivory Importer

By 2005, China was widely recognized as the world's largest importer of illegal ivory over the previous ten years. The CITES Secretariat identified the country as "the single most important influence on the increasing trend in illegal trade in ivory since

1995.²⁴ By this time, China had 11 ivory processing factories, with 12 sites, and 51 wholesale and retailers had been registered and were operating under the SFA registration scheme at the time of the CITES verification mission.²⁵

Surveys detected that a flourishing domestic illegal ivory trade continued despite the regulations and that the SFA system was widely abused and manipulated by traders. Long delays in controlling the domestic ivory trade had allowed traders to easily adapt to circumvent weakly enforced state efforts at regulation. In surveys conducted in Beijing, Guangzhou, and Shanghai in 2005, a majority of the ivory dealers interviewed were not complying with the SFA system. Many of the legally registered stores failed to display the required certificates for small ivory products or displayed a pile of certificates, not apparently linked to specific ivory items. In some stores, ivory items requiring a photo certificate did not have a photo. Registered ivory outlets offered to sell small ivory items without a certificate. Other stores sold ivory products from manufacturers that were not registered.²⁶

© IFAW



174 tusks (1800 kgs) seized in Guangdong, 2006.

Some illegal traders who were surveyed claimed that registered outlets sell ivory items that are not the ones originally registered, but illegal duplicates. During the survey, a wide variety of methods used by illicit ivory processing workshops, raw ivory dealers and traders of ivory on the domestic market were detected – all intended to trade ivory of illegal origin.²⁷

Since the establishment of the SFA ivory registration scheme in 2004, government-authorized ivory processing operations increased from 9 to 17, and registered retailers and ivory wholesalers increased from 31 to 87. Significant deficiencies in compliance with the regulations were found in 17 of the 54 registered traders (31%), with the new regulations not implemented or abused by some dealers. Often the government-required certificates were used as a bargaining chip with consumers.²⁸

The survey also revealed that certain retailers owned illegal carving factories and one manufacturer was selling ivory overseas. Registered manufacturers were also found selling ivory products to illegal dealers, and one dealer previously identified as selling illegal ivory was able to obtain an SFA permit even as he continued illegal trading.²⁹

In sum, six main types of violations were detected by the survey:

- registered retailers selling ivory products from illegal carving factories;
- registered manufacturers illegally exporting ivory;
- illegal manufacturers registered as legal outlets;
- SFA certificates used only to pass government inspection;
- unregistered ivory products made from registered raw ivory;
- registered manufacturers selling ivory products to illegal dealers.

One dealer interviewed in the 2006 survey boasted of acquiring ivory from embassy staff of Pakistan, Bangladesh and India. She stated that she exported ivory to Japan, Taiwan and Korea. Another trader in Fujian stated that he bought ivory from sailors who purchase the tusks in Africa.³⁰

Some dealers help clients to mail or ship ivory products overseas and declare them as “crafts.” Japan, Korea, the USA, UK and European countries are the most popular destinations.³¹

Internet auction sites, such as EBay, Taobao and 1pai, have been exposed as another way that ivory is sold on the Chinese market. Over 250 items were offered by internet dealers in Beijing and Shanghai alone. Some dealers accepted ivory carving orders online. Foreign dealers, such as one from Thailand that sold ivory online, offered to smuggle it into China by air or express mail service. The website, Alibaba China, was also found to offer 87 ivory items in a single search. Antiques collection websites are also routinely exploited by illegal ivory traders.³²

In 2005, the CITES secretariat identified China as “the single most important influence on the increasing trend in illegal trade in ivory since 1995.”

HOW CHINA'S DOMESTIC BAN ON RHINO HORN TRADE HELPED SAVE THE WORLD'S RHINOS

China has already set an encouraging precedent in terms of its willingness to crack down successfully on illegal trade in an endangered species.

All international trade in rhinoceros horn was banned by CITES in 1977, but domestic trade continued to flourish in Asia and especially China, where powdered horn was prized in traditional medicines.

In the late 1980's, rhino poaching surged across Africa and Asia in response to growing market demand. CITES member governments responded in 1987 by passing Resolution 6.10, which required all member countries to ban all domestic sales and trade in rhino products, "especially horn".¹ China, however, ignored the resolution and continued to allow domestic trade in rhino products.²

In 1991 and 1992, a Taiwan based syndicate bought up most available rhino horn in Taiwan, Japan and South Korea, collecting some six tons and sending prices soaring.³ Rhino poaching increased further, decimating populations ranging from Zimbabwe's private reserves to Kazaringa National Park in northern India. The syndicate sold all six tons of rhino horn to mainland China, where state officials from the government owned pharmaceutical industry sought to make big profits on the stocks.⁴

In 1992, EIA launched a worldwide campaign against Taiwan for brazenly trading in rhino horn in contradiction of CITES requirements.⁵ Three days after the campaign launch, Taiwan's president banned trade in rhino parts, though the ban was not immediately

enforced. EIA investigators, posing as rhino horn dealers, then made contact with the Chinese syndicate that had bought the six tons of horn. In a warehouse in Southern China, one ton was shown to the EIA team, which secretly filmed it. A senior official from the pharmaceutical company said that he would arrange for military police to escort the shipment to Hong Kong.

EIA's film, released in 1993, received worldwide publicity and provoked the CITES Standing Committee to agree that member governments could take stricter domestic measures to end trade in rhino horn. Based on EIA's evidence, President Bill Clinton enacted trade sanctions against Taiwan valued at US\$25 million, which in turn triggered a sustained effort by the Taiwanese government to crack down on illegal rhino horn trade.⁶

The State Council of China also enacted a ban on domestic rhino horn trade. The horn filmed by EIA was seized and the CITES Secretary General was invited to attend the official burning of some 265 kgs – a dramatic demonstration of China's commitment to uphold international protection for the world's rhinos. Subsequent monitoring of rhino horn availability across the country confirmed a rapid withdrawal of products from stores and street markets.⁷ By 1995, WWF reported that almost all rhino populations had begun to stabilize.⁸ China's giant market had closed, removing the incentive for poaching. The Government of China had provided the political will, determination and resources to fully and effectively implement the ban on trade in one of the world's most endangered species.



ABOVE: One ton of poached rhino horn offered for sale by Chinese state officials to EIA undercover investigators in 1993. © EIA.

2006-2007: TIBET IVORY TRADE

In 2006, while investigating the illegal tiger trade in Tibet, EIA and partners, the Wildlife Protection Society of India (WPSI), discovered substantial amounts of ivory on sale. Although Tibet is not a traditional center for ivory distribution, ivory was on sale in 24 shops primarily aimed at tourist sales, in Lhasa. A wide range of items, often in significant quantities, was available, including bangles, Buddhist prayer beads, name seals, brooches, hair rings, cigarette holders, ornamental carvings and chopsticks.

None of the items carried the universal ivory mark required under Chinese legislation, nor did they have the necessary accompanying certificates which identify the product and confirm its legality. None of the shop premises displayed the required official permit confirming their status as legally authorized sellers of ivory.

The majority of traders said that there was “no problem” for tourists to take ivory souvenirs out of the country. The ivory was said to be mostly from India, Thailand and Africa.

In February 2007, EIA and WPSI conducted another survey of ivory availability in Tibet. Seventeen shops visited openly displayed and sold ivory. Many had large ivory statues which the shopkeepers claimed were antiques though the items were pale in color with no telltale cracks or other signs of ageing. Medium and small sized ivory items (traditional hair decorations, bangles, beads, prayer bead strings, small carvings and other miscellaneous items) were available in all the shops selling ivory.

When asked if ivory could be taken out of the country, every retailer confirmed there would be “no trouble” carrying carved ivory on the international flight. Raw ivory, however, they said would be a problem to take across any border. One shopkeeper showed investigators a photograph of two tusks that he admitted had been smuggled from India and sold in Lhasa.



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ABOVE and BELOW LEFT: Ivory bangles, beads, and carvings available in Lhasa.

Most of the statues were said to have been carved in Hong Kong and Taiwan. One trader said raw ivory came from Africa and worked ivory came from Thailand. None of the shops displayed the registration certificates required by the Chinese government’s new ivory regulations.

The majority of traders said that there was “no problem” for tourists to take ivory souvenirs out of the country.



© Gosling/EIA/WPSI

MAJOR IVORY SEIZURES IN CHINA (1996 - 2006)



©HMCE

42

23



Joyce Wu/ TRAFFIC East Asia



©FAW/Customs & Excise Dept Hong Kong SAR

CHI

29

48

20

6



©Kenya Wildlife Service

188 tusks seized in Kenya (1999)



©Last Great Ape Organization



©FAW/D.

40



©FAW/D. Willetts

38

YUNNAN PROVINCE

28

1. August 2006: 303 tusks and 408 ivory pieces were seized in Shanghai.
2. August 2006: 145 ivory pieces from Africa were seized in Nanjing.
3. June 2006: 17 ivory pieces were seized in Fuzhou.
4. May 2006: 1800 kgs. of ivory were seized in China (unspecified).
5. May 2006: 3900 kgs. of 605 tusks from Cameroon were seized in Hong Kong.
6. May 2006: 4,000 kgs. of ivory, allegedly destined for China, were seized in Zimbabwe.
7. March 2006: 13 ivory carvings from Nigeria were seized in Shanghai.
8. May 2005: 62 ivory carvings from Uganda were seized in Tianjin.
9. December 2004: 730 kgs. of tusk pieces destined for China were seized in Hanoi, Vietnam.
10. March 2004: 300 kgs. of unspecified ivory were seized in Guangzhou.
11. March 2004: 595 kgs. of unspecified ivory were seized in China.
12. October 2003: 1932 kgs. of unspecified ivory from Tanzania were seized in Hong Kong.
13. January 2003: 92 ivory carvings from Cameroon were seized in Zhejiang.
14. October 2002: 81 tusks en route to China were seized in Hong Kong.
15. August 2002: 700 ivory carvings, weighing 3000 kgs., from the Democratic Republic of Congo were seized in Shanghai.
16. August 2002: 21 tusks were seized in Guangzhou.
17. June 2002: 532 tusks and 40,000 hankos, weighing 5600 kgs., were seized in Singapore (bound for Japan).
18. May 2002: 800 ivory pieces from the Democratic Republic of Congo were seized in Beijing, heading for China's Ministry of Defense.
19. April 2002: 295 ivory pieces were seized in China (unspecified).
20. September 2001: 20 tusks and carvings of Kenyan origin were seized in Zurich, Switzerland.
21. July 2001: 58 tusks from Kenya were seized in Beijing.
22. July 2001: 260 tusks from Mali were seized in Xiangju.
23. June 2001: 33 tusks destined for China were seized at the Brussels International Airport in Belgium.
24. June 2001: 244 ivory pieces were seized in Wenzhou.
25. June 2001: 258 ivory pieces from Mali were seized in Hangzhou.
26. May 2001: 295 tusks, weighing 2631 kgs., were seized in Qingdao.



- 27. April 2001: 445 kgs. of raw ivory bound for China were seized at Gatwick Airport, UK.
- 28. March 2001: 114 kgs. of elephant hides from Myanmar were seized on the China-Burma border.
- 29. February 2001: 73 tusks, weighing 518.9 kgs., were seized at the Schipol Airport, Netherlands destined for China.
- 30. January 2001: 1533 ivory pieces/carvings were seized in Shanghai.
- 31. October 2000: 25 ivory pieces, weighing 123 kgs., from Benin were seized in Shanghai.
- 32. July 2000: 8100 kgs. of tusks from Zimbabwe were seized in Beijing.
- 33. May 2000: 507 kgs. of tusks from Africa were seized in Shenzhen.
- 34. October 1999: 15 tusks and 9 ivory pieces were seized in Shanghai.
- 35. October 1999: 214 tusks and 3249 ivory carvings were seized in Tianjin.
- 36. October 1999: 102 tusks, 412 semi-worked pieces, and 3531 ivory carvings were seized in Tianjin City.
- 37. September 1999: 912 kgs. of worked ivory were seized in Putian.
- 38. September 1999: 11 tusks and 99 kgs. of dried elephant skins were seized in Yunnan Province.
- 39. August 1999: 2100 kgs. of unspecified ivory were seized in China
- 40. August 1999: 188 tusks originating from Cameroon and destined for China were seized in Kenya from a North Korean diplomat.
- 41. August 1999: 300 ivory pieces from Africa were seized in the Guangdong Province.
- 42. April 1999: 537 kgs. of tusks destined for China were seized at the Sheremetevo International Airport in Moscow, Russia.
- 43. March 1999: 300 tusks were seized in Shanghai.
- 44. March 1999: 330 tusks, weighing 2934 kgs., were seized in Huangpu.
- 45. January 1999: 221 pairs of tusks, weighing 2020 kgs., from South Africa were seized in Guangxi Province.
- 46. November 1998: 1600 kgs of unspecified ivory were seized in Henjiang Port.
- 47. October 1998: 1591 kgs. of unspecified ivory were seized in Zhanjiang.
- 48. October 1998: 576 kgs. of tusks were seized at Roissy Airport in Paris, France destined for China.
- 49. August 1998: Carvings from Zimbabwe were seized in Hunan Province.
- 50. January 1996: 72 tusks, weighing 750 kgs. were seized in Fuzhou.

HONG KONG IVORY TRADE

By the time CITES listed African elephants on Appendix 1, Hong Kong – then under British legal control – was the international center of illegal ivory trade. The five major international syndicates trading in poached elephant ivory were run by Hong Kong nationals who maintained a global network of contacts from the killing fields of Africa, though major entrepot nations such as the United Arab Emirates, Burundi, Singapore and Taiwan to the major consuming markets in Japan, America and Europe.¹

Hong Kong imported almost 4,000 tons of ivory between 1979 and 1988, reaching 500 tons a year in 1986, with legally declared imports declining in the years before 1989 to 225 tons a year. Traders there had a massive re-export business in raw tusks, pieces and scrap to ivory industries in Japan, China, India and other countries. Japan was the largest buyer of raw tusks from Hong Kong during this period – 767 tons – while China imported 230 tons.² Hong Kong was also the world's largest supplier of worked ivory products to the US, the European Union and other countries.

In June 1989, Hong Kong traders reported registered stocks of 665 tons of ivory, 497 raw and 168 worked, though the stocks were never physically inspected by government authorities. Although 152 companies were involved in the trade, 12 of these controlled 75% of the ivory business. By early 2000 the amount of registered ivory had shrunk to around 260 tons, of which 160 tons was raw ivory.³ Despite a decline in retail stores, from 264 listed in 1989 to 43 in 2000, a

substantial retail trade continued to target the tourist trade. Many ivory shops confirmed that they sold ivory to foreign tourists from the US, Japan and Europe.⁴

One shop offered to label large ivory carvings as bone to facilitate export. Despite a ban on ivory transport to the Chinese mainland, EIA uncovered strong links between Hong Kong ivory businesses and the mainland. Within China, Yue Ya and Leung Fat ivory companies boasted of their ability to move ivory across the border to Hong Kong. Meanwhile, Leisure Corner shop in Hong Kong obtained carved ivory figures from China, and a Kowloon firm, Pak Lok, spoke of a secret factory in southern China where ivory is carved.

By 2002, the Hong Kong ivory trade was becoming more focused on the mainland.⁵ Several companies admitted that they owned or used carving factories in mainland China. Demand in China was growing as demand in Hong Kong continued to decline. Large volumes of illegal ivory were flooding into the mainland and it is possible, though not well documented, that substantial amounts of Hong Kong ivory stocks were moving to the Chinese mainland to meet growing demand for ivory there.

According to Bradley Martin's 2002 report on Asian ivory markets, "Probably many tusks have been moved illegally out of Hong Kong since July 1990, with the most likely recent destination mainland China."



LEFT: Hong Kong syndicate runs secret ivory factory in Dubai to smuggle ivory into Hong Kong, Taiwan, and Singapore 1989.

RIGHT: Elephant in Zambia.

Evidence for this smuggling is partly based on official seizures of ivory from Hong Kong destined for China.⁶ In 2002, Martin counted 35,884 ivory items on sale in 45 shops, which accounted for 43% of the retail outlets registered with the government. The items counted, however, did not include products stored away in places inaccessible to walk-in buyers.

The continuing role of Hong Kong nationals in the illegal international ivory trade was exposed again in June 2002 when 5.6 tons of raw ivory tusks and 40,000 hanko were seized in Singapore – the largest ivory bust since the international ivory ban was passed in 1989. A network of shadowy Hong Kong based ivory dealers, active in the business since the mid-1980's, were the leaders in an ivory smuggling syndicate that moved poached ivory from Zambia and Mozambique, through Malawi, shipping out of Durban in South Africa and onto Singapore. At least 19 shipments were made between March 1994 and June 2002. Four of those ivory shipments were sent on to China and other 14 went to Japan.⁷

In 2006, the ivory stockpile in Hong Kong was said to be 240 tons. The continued decline of the ivory stockpiles is most likely due to illegal trade and exports. TRAFFIC noted that “Seizure information since the ban suggests there is another, underground trade in semi-worked ivory passing through Hong Kong and destined for other Asian markets. The habitual use of the 5 kg personal effects exemption to carry ivory to Taiwan and Japan is of special concern and could constitute a significant means of illicit trade.”⁸

By 2006, vendors viewed the trade pessimistically and thought there was little future in it. Many hoped to sell out their current stocks and go into another more lucrative business. In contrast to the booming trade on mainland China, the Hong Kong trade is in a continuing decline, relying on sales to tourists, mainly from Japan who carry illegal ivory products back without the required CITES permits.⁹ Tourism has increased enormously since the 1989 ban and the

Japanese are the most numerous, with almost 1.4 million visiting in 2000. The Japanese buy netsuke carvings, hankos and chopsticks made of ivory.

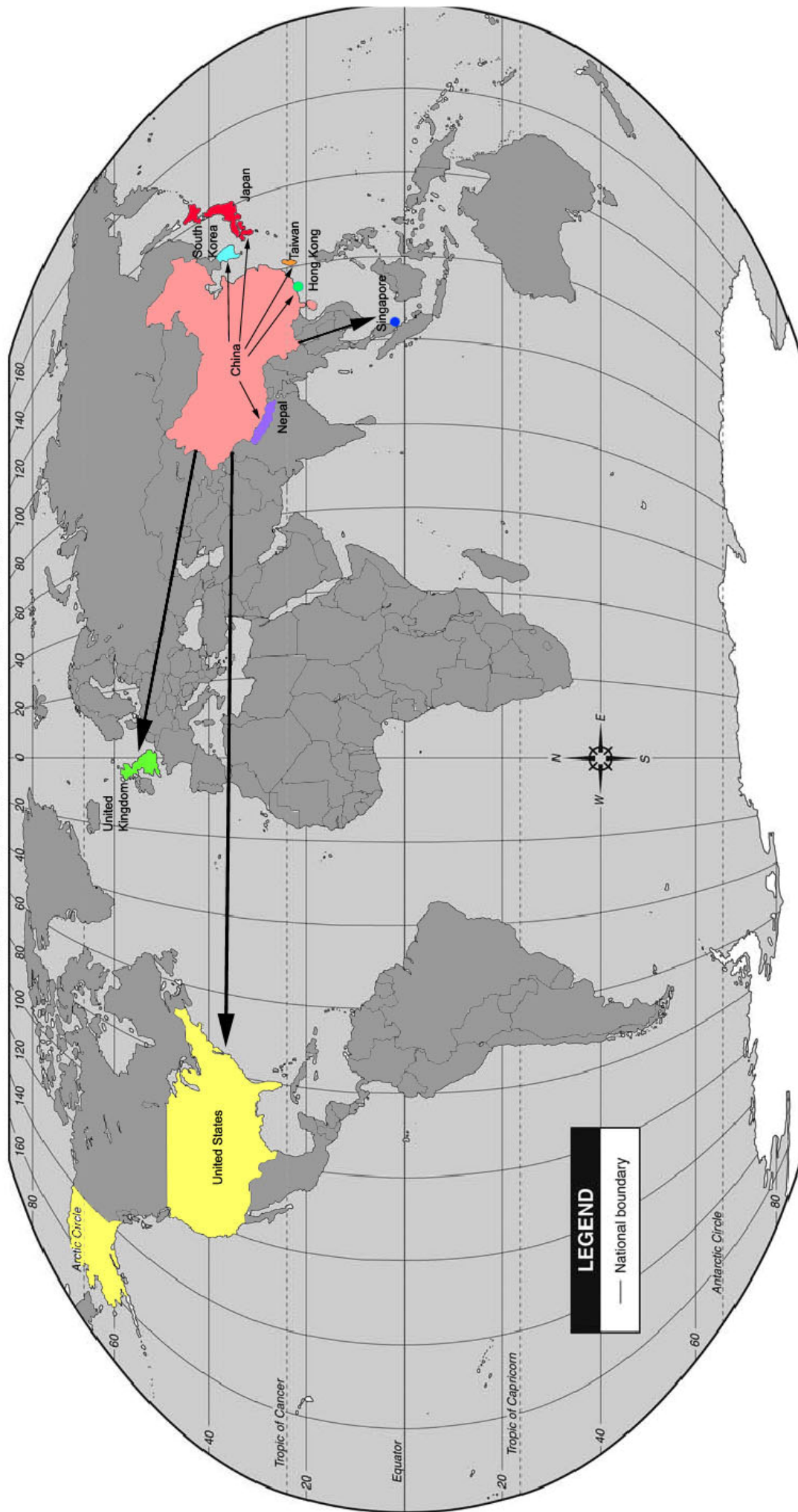
In recent years Hong Kong has seen a rise in seizures of large volumes of ivory from Africa destined for the Chinese mainland. Hong Kong is transitioning from its previous role as the dominant player in global illegal ivory trade into the role as primarily a facilitator for the booming Chinese market.

Recent ivory seizures in Hong Kong include:

- May 2006: 3900 kgs (605 tusks) from Cameroon;
- October 2003: 1932 kgs of ivory from Tanzania;
- October 2002: 81 tusks en route to China.



CHINA'S RE-EXPORTS OF IVORY



Tusks and ivory, smuggled in from Africa, are often re-exported from China to other countries. The major destinations for re-export are the United States, the United Kingdom, Nepal, Singapore, Hong Kong, Taiwan, South Korea, and Japan.

ZIMBABWE AND CHINA

China's empire-builders sweep up African riches

RW Johnson
Cape Town

IN the past seven months, Chinese dealers have bought 30 tons of ivory from Zimbabwe's Parks and Wildlife Management Authority — representing the tusks of some 2,250 elephants.

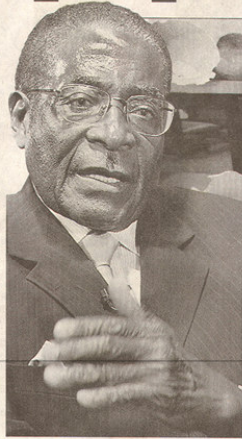
"It's an incredibly profitable trade," said one game ranger. "They've not only run the parks' stockpile right down, but elephants are now being poached across the border from Botswana and other neighbouring countries to fulfil the demand, which seems to be bottomless."

The purchases are typical of China's rapacious scramble for Africa, in which oil, minerals and all manner of raw materials are being eagerly snapped up. Opportunities for deal-making are swiftly exploited, sometimes with detrimental effects on the continent.

Under the Convention on International Trade in Endangered Species, which controls the world's ivory trade, President Robert Mugabe's Zimbabwe has a special concession that allows it to sell lots worth £270 or less. This loophole has allowed the burgeoning trade to develop. Chinese money is now fuelling widespread poaching. Two months ago Zimbabwe police caught Chinese dealers with seven tons of ivory, of which four tons came from illegal sources.

"They deliberately mix legal and illegal stuff together as a disguise," the ranger said. "Of course, the case hasn't come to court and probably it never will, given President Mugabe's 'look east' policy and his passionate enthusiasm for all things Chinese."

In recent months Mugabe has been exhorting Zimbabweans to learn Mandarin and take up Chinese cuisine. Beijing's voracious appetite for raw materials to sustain a fast-growing economy has seen Chinese trade and investment pouring into Africa in the past few years. In 2003



Mugabe is courting Chinese enterprise in Zimbabwe, where ivory is a particular target. China's president Hu Jintao has toured the continent

Under the Convention on International Trade in Endangered Species, which controls the world's ivory trade, President Robert Mugabe's Zimbabwe has a special concession that allows it to sell lots worth £270 or less. This loophole has allowed the burgeoning trade to develop. Chinese money is now fuelling widespread poaching. Two months ago Zimbabwe police caught Chinese dealers with seven tons of ivory, of which four tons came from illegal sources.

the total China-Africa trade was £6.6 billion. By 2005 it had reached £22 billion.

Human rights activists are appalled at the way Beijing has ignored scorpions that have made many western investors wary of dealing with regimes like those of Zimbabwe and Sudan. "Wherever there are resources the Chinese are going to go there," says Peter Taktambudde, head of the Africa division of Human Rights Watch. "They see no evil. They hear no evil. That's very bad for Africans."

Indeed, the Chinese go out of their way to ingratiate themselves with dictators such as Mugabe, donating the blue tiles that adorn his new £7m palace in Harare. They have also decided to foot the bill for a large Namibian presidential palace in Windhoek.

The rhetoric of the China-

Africa relationship with China claim champion of all countries, offering relationship that stems from their deep northern powers.

They are adept file gestures such of four endangered rian tigers to Zimbabwe breeding

They have also getting African large numbers of parts and worked their investment

"Banding villages established, each 2,000 Chinese wao parts of Africa

In Nigeria, a gauge newspaper 50,000 immigrants in Britain's col-

all, however, is the way Chinese imports have largely wiped out budding African industries. Professor Laurence Schlemmer of Witwatersrand University's business school in Johannesburg, said: "In effect, China is forcing Africa back into the role of raw material suppliers — undermining its textile industry and importing raw cotton instead." Such concerns were raised with President Hu Jintao, who recently toured Africa. But for the moment the tidal wave of Chinese money is carrying all before it. "The Chinese are getting away with claiming that they aren't like the other colonialists, but Africans aren't fools," a South African economist commented. "The Chinese are far more ruthless than the Brits ever were."

Nigeria did the British numbers puts it: "The resentment of the Gaborone. Most worrying of

CHINA'S GRAB FOR AFRICA



The extent of Chinese involvement in, and encouragement of, the illicit trade in African ivory is exemplified by the situation in Zimbabwe.

Chinese nationals have been heavily involved in smuggling a steady stream of ivory out of the southern African country for more than a decade. In recent years, both poaching and smuggling activity has intensified, with Zimbabwe's police force warning that a sophisticated network of dealers and traders, involving Chinese nationals, is behind the upsurge.¹ Of 36 incidents of elephant poaching and illegal trade in or involving Zimbabwe, as recorded by various official sources in the media, 22 have occurred since the last CITES COP meeting in 2004.²

History of ivory smuggling

Many of the world's biggest ivory seizures in recent years have involved elephant tusks from Zimbabwe. For example:

- In 1996, an estimated 1.5 tons of carved items was smuggled out by Zimbabwe based Chinese traders.³
- In July 2005, two Chinese nationals were arrested after police discovered 72 elephant tusks in a Harare suburb.⁴
- In May 2006, according to the *Sunday Times of London*, Chinese traders were apprehended with seven tons of ivory, four tons of which was derived from illegal sources.⁵
- Between February and October 2006, seven ivory smuggling operations were foiled passing through the Beit Bridge border from Zimbabwe into South Africa.⁶

Yet these incidents and figures represent the tip of the iceberg. For every shipment that is apprehended, many more are undoubtedly successfully smuggled to China and other Asian markets.⁷

The Chinese connection

The major ivory seizures of recent years have corresponded with rising ivory prices in China. The breakdown of law and order across Zimbabwe, combined with a chaotic program of land reform and corruption among government officials, has also helped create the conditions for successful ivory smuggling. In 2004, the wildlife trade monitoring organization TRAFFIC concluded that law enforcement and the tracking of ivory retail markets in Zimbabwe were only partially effective and that “a robust evaluation of the local control system was warranted.”⁸

Harare has since introduced new regulations suspending all sales of ivory, following a commitment to the CITES Secretariat to tighten ivory trade controls. But effective action is hampered by a severe lack of resources and enforcement personnel. Despite this, the ivory sale suspension was lifted in April 2007.⁹

Zimbabwe is also the only CITES member country that engages in legal, non-commercial exports of ivory carvings.¹⁰ This loophole inevitably provides cover for illegal activity. A *Sunday Times* article from July 2006 stated that Chinese dealers had legally bought 30 tons of ivory from Zimbabwe’s Parks and Wildlife Management Authority in the previous seven months – equivalent to the tusks of about 2250 elephants. It also quoted a game ranger saying that Chinese dealers regularly mixed legal and illegal ivory together before exporting it to Asia. “It’s an incredibly profitable trade,” the ranger reportedly stated. “They’ve not only run the parks’ stockpile right down, but elephants are now being poached across the border from Botswana and other neighboring countries to fulfill the demand, which seems to be bottomless.”¹¹

At least one major case of mixing legal and illegal ivory for export has been recently exposed. A stockpile found in a Harare suburb in July 2005 was concealed in crates with stone carvings laid on top, ready for shipping. Of the 72 tusks, 10 were registered with official serial numbers (bought legally from the ZPWMA ivory store), and 62 were believed by police to have originated from elephants poached in the Zambezi Valley. The *Zimbabwe Herald* reported that a former Zimbabwean MP, who held a trophy dealer’s license, was arrested, along with two Chinese nationals, thus giving a glimpse of the “intricate syndicate” of contacts used by expatriate traders to supply the booming Chinese ivory market.¹² In October 2006, the CITES Secretariat issued a report on the incident, describing it as a “serious breach” of Zimbabwe’s domestic controls.¹³

Illegal internet sales of ivory trinkets

It is not only raw ivory that is flowing from Zimbabwe to China. Chinese dealers are also reported to be illegally trading processed ivory products via Zimbabwean based internet sales. According to a 2007 Kenyan government report on African ivory trade, 30 tons of ivory products carved into chopsticks, hankos and toothpicks has been sold in this way via websites available in China. Chinese citizens simply placed internet orders for items which were then sent to them from Zimbabwe by courier. The

ivory trinkets had been bought legally on Zimbabwe’s domestic market, then evaded export controls by using the Internet.¹⁴

Smuggling routes to China

South Africa and Botswana serve as major smuggling routes for Zimbabwean ivory destined for Chinese and other Asian markets. The Kenyan government’s report, for example, states that ivory is “regularly smuggled” through the Beit Bridge border post, with seven incidents recorded between February and October 2006 alone.¹⁵

The report also describes how ivory is imported from Zimbabwe into Botswana en route to China and Vietnam. From January 2005 to September 2006, 450kg of hankos and other finished ivory products destined for China were seized in South Africa’s Limpopo province, which borders Zimbabwe. Also last year, Chinese nationals were caught in Gaborone, Botswana’s capital, with 18 cut pieces of illegal ivory from Zimbabwean elephants which they were preparing to transport to China.¹⁶

Other reported routes for smuggling ivory out of Zimbabwe include via Mozambique and through Zambia to Tanzania.¹⁷

Poaching surge

The price of Zimbabwe’s illicit export trade in ivory is being paid by its elephants. While Zimbabwe’s large elephant population has not been decimated like those of Central Africa, in recent years poaching has risen sharply in several regions. In Sebungwe, home to one of four major elephant populations in the country, a 2006 survey found evidence of widespread illegal activity, and recorded a 250% increase in dead elephants since 2001. Fifteen percent of all elephants spotted were carcasses.¹⁸

In Northwest Matabeleland, including southern Hwange National Park, surveyors also found evidence that poaching was on the rise, with the ratio of dead to live carcasses up from 3.2% in 2001 to 5.6% in 2006.¹⁹ In Nyami Nyami, Zimbabwe MIKE (a CITES program monitoring illegal killing of elephants) recorded 33 carcasses in surveys conducted during 2000-2004, of which 19 (58%) had been killed illegally.²⁰

Most recently, in October 2006, Reuters reported the slaughter of 11 elephants in Chizarira National Park in central Zimbabwe.²¹ The park is one of several protected areas where Zimbabwean soldiers are reportedly involved in transporting poached ivory.²²

International concern

High profile ivory seizures and poaching incidents have triggered international concern over Zimbabwe’s role in a resurgent illegal ivory trade, and the implications for the survival of Africa’s elephants. In 2004, a report to CITES member countries by the Elephant Trade Information System (ETIS), which tracks ivory movements, warned that processed ivory was being exported illegally from Zimbabwe into consuming countries (such as China) which had banned commercial ivory imports to comply with

CITES. "Zimbabwe needs to improve law enforcement of its own domestic ivory market," it stated, "and, in particular, attempt to curtail sales of worked ivory to citizens of countries...where it is illegal for them to import [ivory] into their own home countries."²³

In December 2006, following the discovery of the ivory stockpile in a Harare suburb, the CITES Secretariat sent a mission to Zimbabwe to investigate its ivory trade control systems. The team concluded that "a degree of complacency in the system's implementation had enabled unscrupulous individuals to circumvent the controls," and suggested enforcement improvements. The Secretariat warned that it may recommend suspending Zimbabwe's ivory trade unless these improvements are implemented.²⁴

The Kenyan government, which presented a proposal to ban international ivory trade for 20 years at the June 2007 meeting of CITES member governments (COP14), has also voiced concern. A detailed report submitted in support of its proposal singled out Zimbabwe to illustrate the resurgence of an underground black market in Africa, emphasizing the role of Chinese traders.²⁵ Zimbabwe's domestic ivory market and its law and order crisis, the report stated, had been successfully "exploited by Chinese dealers to allow illegal dealing in ivory." It added that the alleged involvement of both government officials and army personnel in poaching activity "compromises any ability to control the trade in ivory...in Zimbabwe."²⁶

Some 30 tons of ivory products carved into chopsticks, hankos and toothpicks have been sold via internet to Chinese consumers and sent from Zimbabwe via courier.

BELOW: *Hankos (name seals) are one of the most popular ivory items on the Chinese market.*



CAMEROON



© Last Great Ape Organization

ABOVE: A 2004 seizure in Douala, Cameroon of over 100 kgs. of carved ivory bound for China.

Cameroon's Elephants

Heavy poaching pressure is thought to have caused a considerable reduction in elephant numbers near towns around the Boumba Bek Reserve, in forest routes as well as along the Boumba River in the east of the reserve.¹ The remaining elephants are concentrated in the remote southwestern region of the reserve. A recent survey found no elephant dung in many large areas, including the periphery of the reserve.²

A 2007 IUCN survey re-categorized "probable" populations of Cameroon's elephants, reducing this category by more than three quarters, from 3,058 animals in 2002 to 726 animals in 2007.³

In 2000, EIA visited Lomie (on the outskirts of the Dja Reserve), where some 150 elephants were reported killed annually. A village chief commissioned local Baka hunters to poach on his behalf, with local officials implicated as ivory buyers.⁴

In the southeast of the country, 350 elephants were being killed each year according to then director of wildlife, Denis Koulagna Koutou.⁵ In Yokadouma, traditional Baka hunters offered to poach elephants for the local elite and government officials.⁶ Elephant poaching was allegedly most often commissioned by logging company employees, government officials and urban elites who visit the area for this purpose. Serious elephant poaching in the Mengame Reserve was also reported in 2003.⁷

Ivory Trade

Chinese nationals are involved in illegal ivory trade in Cameroon. Chinese nationals have been observed by LAGA investigators purchasing ivory articles inside major ivory workshops in Douala. In July 2004, a seizure uncovered some 116.5 kg of ivory.⁸

Chinese traders have been observed frequenting ivory markets and buying ivory in the port area of Douala. Much of the ivory for sale caters to the interests of Chinese nationals, selling traditional items such as chopsticks, hanko, Buddha statues and other ornamental carvings.

Traders told EIA undercover investigators in 2000 that the demand for ivory from China was so large it could hardly be filled.⁹ In May 2006, an ivory dealer was arrested on board a Chinese owned ship at the Douala Port for possession of sample ivory products for sale. Two dealers arrested in Douala port in September 2004 were engaged in illegal ivory trade on the Chinese ship Chi Feng Kou. The traders were under surveillance for two weeks before the operation took place. Most of the sales documented took place on foreign ships in Douala, where the ivory is destined for Asian countries.¹⁰



ABOVE: Ornamental carvings of elephants and rhinos are contributing to the decimation of remaining living elephant populations.

Very large shipments of ivory originating in Cameroon have also been seized in Hong Kong and Taiwan in recent years. In May 2006, customs officials in Hong Kong found 3.9 tons of ivory hidden behind a false wall at the back of a metal shipping container containing plywood. The false wall was discovered when the crate was x-rayed in a large machine specially developed for this purpose.¹¹

The Cameroon organization “Last Great Ape” is currently tracking 20 cases that were brought against individuals involved in elephant poaching and illegal ivory trade in 2006, including one who is accused of killing 270 elephants alone.¹²

- In January 2003, Chinese customs in Zhejiang province seized 92 ivory items from Cameroon, buried among other goods in two containers.¹³
- In May 2000, customs in Taiwan seized 322 tusks from Cameroon.¹⁴ It was not confirmed whether the ivory was destined for China, although Taiwanese ivory trade has long been linked to Hong Kong.¹⁵
- In 2002, a TRAFFIC briefing named Cameroon as the African nation with the largest domestic ivory trade on the continent.¹⁶ In 2004 TRAFFIC classified the market as “large”, remarking that Cameroon remains a major sub-regional entrepot for illegal trade.¹⁷

Domestic Ivory Markets

EIA found large amounts of ivory available in the capital city of Yaounde in shops at the artisanal market in 2000. The majority of carved ivory and tusks in Yaounde were from the southeastern part of the country, such as the village of Naymantibi. Men who had worked as drivers for logging companies explained how ivory is hidden between the logs on the logging trucks and deep inside the gas tanks for transport within Cameroon. Ivory from neighboring countries – CAR and Congo – is moved across borders in the same way. Logging companies commission the poaching and open up remote areas to facilitate easy access.¹⁸

Ivory data in the ETIS 2005 database reports 204 seizures of Cameroon ivory outside of the country over the last 17 years, totaling 7,245 kgs, and 26 seizures inside Cameroon totaling 1,221 kgs of ivory.¹⁹

CENTRAL AFRICA

The fate of central Africa's elephants is inextricably linked with Chinese demand for ivory.

Since the mid 1990's, poaching activity and ivory smuggling has risen across the region, mirroring rising Chinese demand – and prices – for ivory goods. Evidence shows that Chinese citizens living in Africa also play a role, both as consumers of ivory products and through their involvement in the illegal ivory trade.

Political instability in several countries, including civil war and unrest, have produced fertile ground for well organized ivory syndicates, with governments unable to provide adequate protection for elephant populations. As a result, since the mid 1990s, Central Africa has been the major source of illegal ivory imports into China.¹

Countries afflicted by surges in poaching activity and cross border ivory smuggling include Sudan, the Central African Republic, the Democratic Republic of Congo (formerly Zaire) and Chad.

In 2004, a report from the CITES Secretariat warned that the poaching epidemic threatened the survival of forest elephant populations in the Central African Republic and Congo: “The area's elephants appear to have been reduced to very small fractions of their former abundance while poaching still proceeds apace. Unless poaching and the factors that promote it are reduced, the future of Central Africa's remaining elephants remains under real and imminent threat.”²

In 2006, after a fact-finding mission to China, the CITES Secretariat also issued a stark warning about China's role in decimating Central Africa's remaining elephant herds: “The Secretariat remains concerned that China continues to be a major destination for illicit trade in ivory. It is also concerned by the evidence and intelligence which indicate that citizens of China in Africa are engaged in such illicit trade.”³

An examination of poaching trends and ivory trading within and between Sudan, the Central African Republic and Congo confirms the clear links between Chinese demand and African supply.



© Environmental Investigation Agency

“Unless poaching and the factors that promote it are reduced, the future of Central Africa's remaining elephants remains under real and imminent threat.”

- CITES Secretariat



ABOVE: Roughly three-quarters of buyers frequenting Sudan's ivory markets are Chinese nationals.

“In order to battle against this illegal trade it is imperative to tackle the Chinese; both the buyers of trinkets in Sudan, and the traders who purchase the raw ivory for China’s domestic trade in ivory.”

- Bradley Martin

SUDAN

Sudan is at the center of the elephant poaching upsurge afflicting Central Africa. An impoverished and war torn country, it has become a conduit for illegal trade. Its capital, Khartoum, is one of the world’s largest ivory markets.⁴

Sudanese ivory prices have doubled during the last decade, to US\$105 per kilo, due to rising demand driven by Chinese expatriates and China-based traders.⁵

Elephants are paying the price for this expanding market. While it is legal for licensed Sudanese shopkeepers to sell items carved from tusks which pre-date the 1990 CITES ban, most of the ivory on sale today reportedly comes from new tusks.⁶

This poached ivory originates from both southern Sudan’s own dwindling elephant herds and from neighboring countries. Poachers operate in the swamps, woodlands and grasslands of southern Sudan, where elephant populations have not been surveyed since the early 1980s. Since the 1990s, as demand for ivory has risen, Sudanese poachers have also conducted forays into the Central African Republic, decimating herds along the eastern border. More recently, they have expanded their activities into the Democratic Republic of Congo, including Garamba National Park where both elephants and endangered white rhinos have been slaughtered indiscriminately.⁷

In 2004, a CITES report ranked Sudan eighth among states actively contributing to the illegal ivory trade worldwide.⁸ According to shopkeepers selling ivory in Khartoum, Sudanese soldiers are the main culprits involved in poaching tusks; they supply ivory carvers and retailers, using government issued weapons and vehicles to conduct their clandestine business.⁹

Chinese nationals, thousands of whom are employed in China’s petroleum and construction industries in Sudan, are creating a demand which is fueling this slaughter. A 2005 survey of 50 souvenir shops in Khartoum, North Khartoum and nearby Omdurman documented over 11,000 ivory items on sale. Ivory chopsticks and name seals, aimed at Chinese customers, were especially popular. According to the survey’s author, renowned wildlife trade specialist Dr. Bradley Martin, three quarters of all buyers frequenting Sudan’s ivory souvenir stores are Chinese nationals.¹⁰

The Chinese connection also extends to the home country. China-based ivory traders seeking to satisfy the growing domestic demand are buying tusks on the underground market in Khartoum, shipping them to China and selling them to craftsmen who fashion the raw ivory into chopsticks and souvenirs.¹¹

Economic trends underscore the close connection between the Chinese and Sudanese markets. A 2006 investigation by Dr. Martin of the illegal ivory trade in China found that prices had risen 300% in the previous two years, mirroring price rises in the souvenir stores of Khartoum.¹²

Sudan has rarely reported seizures of illegal ivory and the government shows little interest in, or ability to, crack down on the flourishing illegal trade within its borders. Khartoum’s role as a conduit for illegal ivory from across central Africa is therefore unlikely to be brought under control unless China bans its ivory trade and cracks down the illegal traders. That it does so is critical to the survival of elephant populations across Central Africa.

CENTRAL AFRICAN REPUBLIC

Once teeming with elephant herds, the Central African Republic today has just three known remaining populations.¹³

Two of these have suffered steep declines in recent years as a result of incursions by armed and highly organized ivory poachers from Sudan and Chad, who hunt elephants alongside communities seeking bushmeat.¹⁴

In the southeast, only an estimated 500 forest elephants now roam the Bangassou area, compared with 1,600 in 1996, according to a 2006 report by the MIKE program.¹⁵ A 2004 survey covering a ground area of over 500km failed to spot a single elephant.¹⁶

The decline is even more dramatic in the adjoining national parks of Dzanga-Sangha and Dzanga-Ndoki in the southwest. Although all hunting is banned inside the parks, a MIKE survey estimated that only 869 elephants survived there in 2004, compared with 2,977 in 2002.¹⁷

In both areas, the MIKE surveys documented poaching and human encroachment as the major cause of elephant losses. In Bangassou, surveyors found 47 hunting camps – although these could not be categorically confirmed as elephant poaching camps¹⁸ – and 190 shotgun cartridges. In the southwest, six poached elephant carcasses were found in or close to Dzanga-Sangha National Park.¹⁹

The expansion of poaching activity threatening the future of

“Unless this poaching is controlled immediately, the elephants in the Okapi Wildlife Reserve...will soon be threatened with total extinction.”

- Congo Daily, January 2005

CAR's elephants is directly linked to Chinese demand. Sudanese and Chadian gangs are responsible for much of the slaughter, especially in Bangassou.²⁰ Their cross-border activities are undertaken to supply ivory markets in their home countries, fuelled by Chinese expatriates, and to supply raw tusks to Chinese traders for illegal export.

DEMOCRATIC REPUBLIC OF CONGO

Ivory poaching is also the biggest threat to the survival of elephants in the Central African Republic's neighbor, the Democratic Republic of Congo.²¹

Since 2004, Sudanese poaching gangs have also expanded their operations from the Central African Republic into the DRC. In particular, Sudanese Baggara horsemen have targeted Garamba National Park along the northeast border, killing many elephants and, as a bloody by-product, also slaughtering rare white rhino.²² A regular park survey in 2004 had estimated a population of 6,354 elephants. However, a subsequent survey in August 2005, conducted in the wake of reports of heavy poaching, counted only 1,202 elephants in the south of the park. The African Parks Foundation has since taken over the park's management and introduced anti-poaching operations.²³

The Okapi Faunal Reserve, a wildlife rich World Heritage Site in eastern Congo, is another prime target. According to the Congolese Institute for the Conservation of Nature, an estimated 17 tons of ivory (which they estimated as equivalent to 1,150 elephant tusks) was smuggled out of the reserve between July



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RIGHT: *Elephant in CAR killed by Sudanese poachers on horseback, using spears.*



LEFT: Remains of two of around 100 elephants massacred by poachers in Chad's Zakouma National Park in 2005. Ivory from Chad is also smuggled into Sudan and on to China.

and December 2004 alone.²⁴ The Institute's 2005 report also claims that Congolese police and army personnel are involved in the poaching and smuggling of tusks to Uganda to satisfy rising demand for ivory.²⁵ A 2006 dung survey conducted in the reserve confirmed a drop in numbers, estimating a population of 2,688 elephants compared with 3,808 in 2000.²⁶

A third protected area, Salonga National Park, has witnessed poaching on a scale similar to that in Garamba. A 2004 survey by technicians from the Congolese Institute for the Conservation of Nature, which manages the park, and the Wildlife Conservation Society Congo, found evidence suggesting a population of only 1,825 elephants. This represents a precipitous decline since 1992, when an estimated 8,330 elephants roamed the park. Hunting and poaching were clearly to blame, with researchers locating 39 hunting camps definitively used by elephant poachers. Semi-automatic weapons were discovered at many locations, including 18 AK-47s in a single camp in the south of the park.²⁷

Ivory trade experts tracking ivory from DRC reported in 2006 that most of the country's poached ivory is destined for overseas markets. It is moved through Sudan, Uganda and Angola en route to its final destination, which they believe is often the Chinese carving industry.²⁸

Large amounts of ivory originating from the DRC have been confiscated in recent years, including the estimated 17 tons taken from the Okapi Faunal Reserve in 2004. Angola is a favorite conduit for illegal ivory from its neighboring countries, as it is the only one of 37 African elephant range states not to be a CITES member. In one visit to Luanda's craft markets in 2006, researchers for TRAFFIC found enough ivory to account for 250 dead elephants. Yet Angola's entire indigenous elephant population is estimated at only 240 animals.²⁹

By contrast, DRC's once significant domestic ivory market has declined in recent years,³⁰ suggesting that the country's poaching epidemic is almost entirely driven by overseas demand.

As China is the world's biggest importer of illegal ivory, and as ivory routed through Sudan is known to be imported by Chinese traders, the fate of DRC's remaining elephants is clearly tied to the Chinese market.

NIGERIA

At 478 animals, Nigeria's population of elephants has been described as "small, relict and unviable."³¹

Nigeria's ivory market is mostly supplied from the Democratic Republic of the Congo, Central African Republic, Congo (Brazzaville), Gabon, Cameroon and Chad. Numbers of retail outlets and ivory items for sale in Lagos, a major exit point for ivory, have increased. Customs authorities, embassy staff and ivory vendors facilitate illegal exports. Most ivory is purchased by American, Chinese, Italian, Japanese and Korean buyers, according to traders.³²

Chinese buyers are implicated in the export of containers of ivory. Several large ivory seizures in or destined for China have originated in Nigeria.³³

- April 1999: 537kg of tusks destined for China seized in Moscow, Russia.
- 2001: 2,614kg of ivory shipped from Nigeria seized in China.
- February 2001: 518kg destined for China seized at Schiphol Airport in the Netherlands.

TANZANIA

© Environmental Investigation Agency



ABOVE: *Poached elephant in Tanzania.*

Tanzania recently withdrew its proposal to the June 2007 Conference of the Parties to CITES to downlist its elephant populations from Appendix 1 to Appendix 2.

Elephant poaching has been on the increase in Tanzania in recent years. By 1999, 500 elephants were reportedly being poached each year in national parks like Mikumi, Tarangire, Lake Manyara, and game reserves like Ruaha and Moyowosi.¹ By 2002, witnesses described a “heavy increase” in poaching in game reserves including the Selous, Kisigo and Rungwa. Observers reported a further increase in poaching incidents to EIA since 2004.²

Poaching activities are undertaken by well-organized and well-resourced syndicates, operating with the cooperation and/or involvement of government officials, including army and police. A Tanzanian press report from 2005 found that elephant poaching was rife and on the rise “despite the government’s denials.”³ An undercover reporter interviewed a poacher who said that the movers in the lucrative illegal ivory trade are “senior people in the government” and “their contacts in foreign countries.” The poacher said that the movers provide them with guns, bullets and information on where to operate. A former game ranger moves the ivory from the bush to three safe houses in Dar es Salaam.

Raw ivory is said to be purchased by Chinese and Koreans. Traders stated that Chinese and Korean embassy staff have

sent crates of ivory to their countries via diplomatic baggage. Tourists from China, America, Italy and Spain also buy the ivory products.

In 1998 a Chinese businessman known as “Mr Bo”, said to be a former senior official at the Chinese embassy in Dar es Salaam, was seeking to ship a large volume of ivory tusks from Dar es Salaam to China. Bo was alleged to be shipping arms into Rwanda. (Between 1996 and 2003, China delivered at least 13 covert shipments of weapons labeled as agricultural equipment to Dar es Salaam, according to the Overseas Development Institute.⁴) Bo had stored a vast stock of raw ivory tusks in a Dar es Salaam warehouse. While waiting to arrange for the smuggling of the ivory, a witness observed Bo in the company of a Chinese government official who was said to be responsible for moving the ivory back to China. The ivory was to be hidden in containers beneath logs.⁵

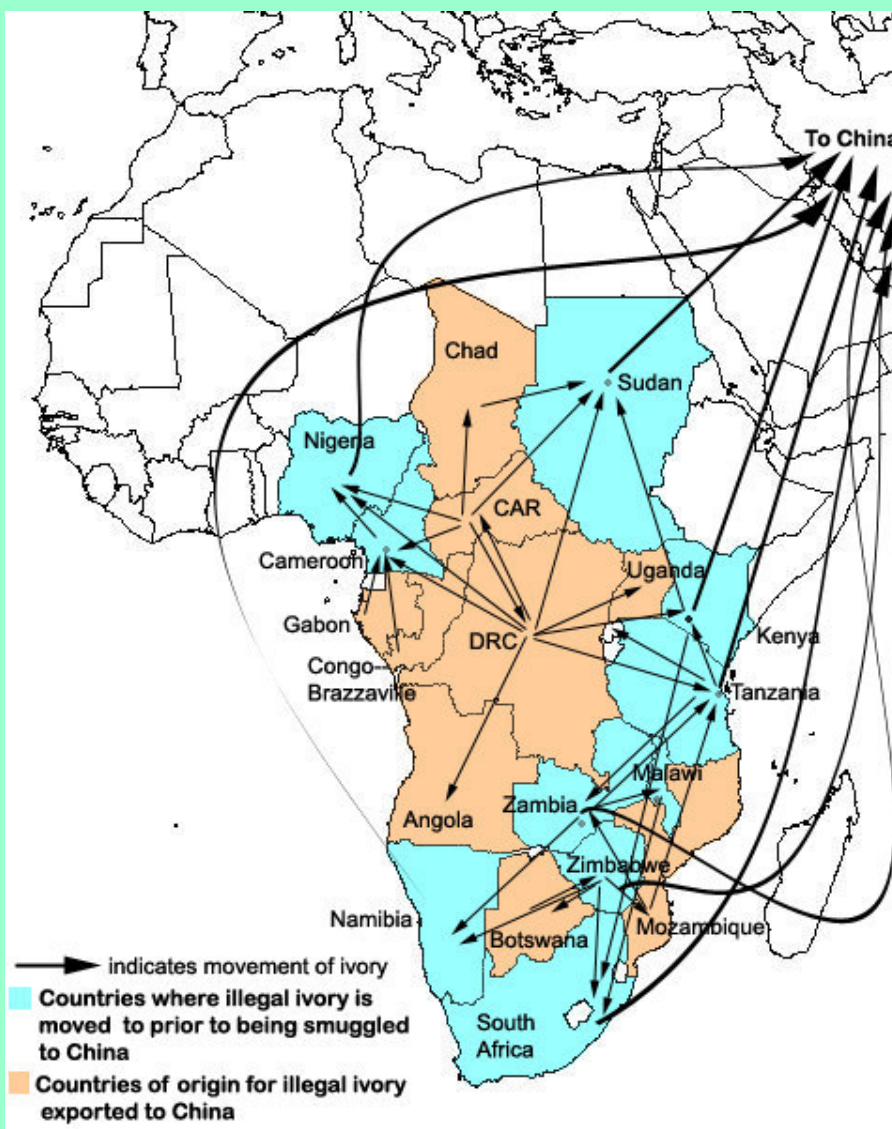
Tanzania has an active illegal ivory market. Between 1999 and 2007, there were at least 27 ivory seizures recorded in Tanzania, totaling 1,728 tusks and 624 carvings – weighing 4,431.5 kg.⁶ In January 2002, 1,255 tusks weighing 3,207 kgs were seized in Dar es Salaam, and 136 tusks were seized in February of the same year.⁷ In September 2001, 42 tusks weighing 580 kg were seized by Tanzanian airport staff in a shipment destined for the Moroccan embassy in Thailand.⁸

Ivory was easily obtainable in Dar es Salaam and Mtwara in 2006.⁹ Two traders in Dar es Salaam offered to supply significant quantities of raw tusks on a regular basis.

Several freight forwarding companies boasted to investigators of their experience in shipping ivory to China or Taiwan in recent years; they advocated “layering” cargo and ebony handicrafts or food products on top to conceal the ivory, and shipping full container loads to reduce the chance of customs checks. They recommended misreporting the cargo content on the Bill of Lading and bribing various authorities – customs, security and forestry officials – to ensure safe delivery of the ivory. All ivory shipments, they said, are routed through Singapore, often via Dubai.¹⁰

Major seizures of ivory originating in Tanzania and Mozambique have occurred in China, Taiwan, the Philippines, Vietnam and South Korea in recent years:

- On July 4th, 2006, a shipment of 350 tusks weighing 2,600 kg was seized in Taiwan after being shipped from Tanga on Tanzania’s northeast coast – a historically prominent route for smuggling ivory destined for Dubai or Hong Kong.¹¹
- On July 6th, 2006, a further shipment of 744 ivory pieces from Tanzania, weighing 3,026 kgs, was seized in Kaoushiung.¹²
- In October 2005, a shipment of 6,000 kg shipped from Dar es Salaam to the Philippines was seized by Philippines authorities.¹³
- In May 2005, 503 kg of Tanzanian ivory and tusks were seized in Hong Kong, having been shipped via Singapore.¹⁴
- In December 2004, 730 kg of Tanzanian ivory was seized in Hanoi, Vietnam.¹⁵
- In October 2003, 1,932 kg of ivory tusks from Tanzania were seized in Hong Kong, having been shipped via India and Indonesia.¹⁶



Ivory Trade Flows within and out of Africa

Map based on data compiled within this report. © EIA.

ZAMBIA AND MALAWI

© Mary Rice/EIA



Poaching has been heavy in many parts of Zambia for over a decade, accounting for an estimated 800 elephant deaths a year and threatening their survival in three national parks.¹

In Kafue National Park, close to the capital, Lusaka, the elephant population fell dramatically between 1991 and 2004, from about 10,200 animals to an estimated 5,227 animals. Nationwide, Zambia's total population has failed to increase since the 1989 ban on international ivory trade and despite domestic bans on hunting elephants and internal trade in ivory.²

Poachers connected to ivory trade middlemen operate both within and from outside Zambia's borders. A CITES-appointed Panel of Experts warned in 2002 that West Lunga National Park in the north-west, Nsumbu National Park in the north, and Sioma Ngwezi National Park in the south-west were all targets of cross-border poaching incursions from neighboring countries. It also reported that aerial surveys had recorded poachers' camps in all of Zambia's major national parks.³

As in Central Africa, the ivory trade trail from Zambia's savannas points clearly to China. According to evidence gathered by anti-poaching officials and NGO investigations, tusks hacked from elephants in Zambia's remote national parks are often destined for Chinese middlemen who ship them to Asian markets.

DNA analysis of tusks revealed that Zambian elephants were the victims of the largest shipment of illegal ivory ever seized — 5.6 metric tons detained in Singapore in 2002. The 532 tusks and more than 40,000 ivory hankos represented a poaching holocaust of at least 3,000 elephants, according to the team at the University of Washington, Seattle, who conducted the tests.⁴ The seizure led to subsequent investigations by the Environmental Investigation Agency, which revealed that this huge consignment was only one of 19 smuggled by an ivory

syndicate whose sophisticated network reached from Africa to Singapore, China and Japan.

Since then, despite the best efforts of the desperately under-resourced Zambia Wildlife Authority, illegal ivory trade activity within the country's borders has remained high.

- During 2006, there were 18 seizures of illegal ivory originating from Zambia, according to data from the Lusaka Agreement Task Force. One involved 20 pieces of ivory intercepted at Lusaka International Airport, bound for China.⁵
- In September 2005, six tons of ivory were seized in the Philippines en route from Zambia.⁶ The cache originated from Tanzanian elephants.
- In July 2005, 23 tusks weighing 377kg were seized in Lusaka, and five months later ten tusks were seized in the town of Luangwa Boma.⁷
- In March 2005, 261kg of ivory shipped from Zambia were seized in the Philippines.⁸
- In July 2004, 691 pieces of ivory were seized by the Zambian Drug Enforcement Commission as two Lusaka businesswomen attempted to transport them to South Africa.⁹

Given the common assumption that 10% of contraband products are intercepted, these incidents undoubtedly represent only a fraction of the black market ivory activity involving Zambia. Their frequency suggests that the situation has not improved significantly since the CITES Panel of Experts warned in 2002: "The fact that [Zambia's] overall population is not increasing (and could be decreasing) suggests that there is an important illegal off take... The Panel estimates that this accounts for up some 800 animals a year. It must be concluded that the overall level of off take is not sustainable."¹⁰

The China-Zambia-Malawi Syndicate

Zambia shares borders with five other African range states, including Malawi. The 2002 seizure of 5.6 tons of ivory in Singapore revealed a well established smuggling route for Zambian ivory through Malawi and South Africa, for shipping to Singapore and China.

This black market trail was uncovered through painstaking cross-border investigations by the Zambian Wildlife Authority, the Anti Corruption Bureau in Malawi and the Lusaka Agreement Task Force. Along with DNA analysis of a sample of the 532 seized tusks, these agencies established that the ivory was poached from across Zambia, in particular South Luangwa National Park; stored in Chipata, a trading town close to the Malawi border; and then smuggled by road to the Malawian capital of Lilongwe. Its destination was a curio factory in a Lilongwe suburb, where Asian buyers linked to ivory traders based in Hong Kong inspected the consignment before it was packed for shipment. Labeled as “stone statues”, the container of ivory was then shipped across various borders to the port of Beira in Mozambique, on to Durban in South Africa and then on to Singapore.¹¹

EIA’s subsequent investigations revealed strong evidence that this same poaching syndicate was long established and had moved ivory from Malawi along the same route to the Far East at least 19 times over eight years. These shipments involved somewhere between 55 and 130 tons of ivory. At least four were sent to the city of Guangzhou, a historic center for China’s domestic ivory trade and modern hub of illegal ivory sales.¹²

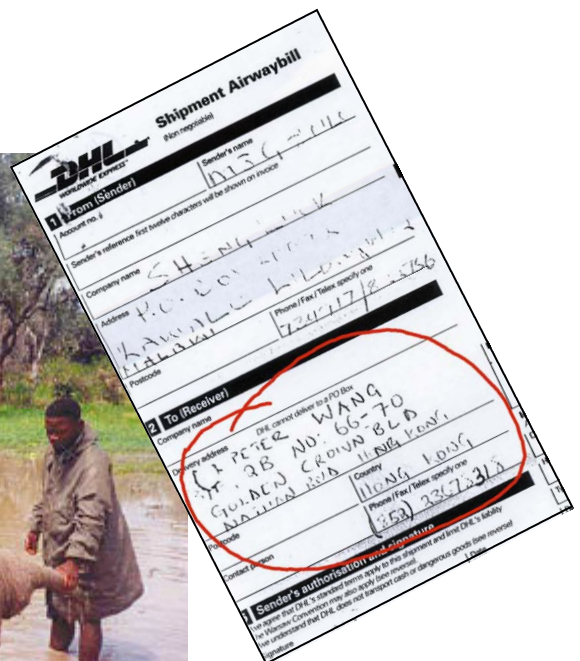
The information which led Zambian officials to the ivory syndicate’s operation came from a poacher who alleged that he had been commissioned to obtain elephants by a senior member of Zambian Wildlife Authority (aided and abetted by corrupt wildlife officials, police and local magistrates). He also revealed that a Chinese national known as Mr. Cheng purchased illegal ivory in Lilongwe and shipped it to Durban.¹³

Following the Singapore seizure, the Zambian government began imposing harsher sentences for convicted ivory traffickers. However, subsequent ivory seizures, while not on the same scale, suggest that illegal trade continues to be a significant problem within Zambia and across its borders. Dr. Samuel Wasser, whose team conducted the DNA tests that identified the tusks seized in Singapore as mostly from Zambia, warned in a February 2007 article for the *Proceedings of the US National Academy of Sciences*: “The enormous size of this consignment indicates the existence of an elaborate network in the Far East that is capable, with a single delivery, to receive and launder tens of thousands of hankos into existing legal markets.”¹⁴

Given Zambia’s lack of resources for wildlife protection and its geographic position – sharing borders not only with Malawi but with several other nations (Angola, DRC and Zimbabwe) that are unstable and vulnerable to illegal cross border trade – its elephants will remain vulnerable to such syndicates unless international demand for ivory is curbed.



© RATZ, Zambia



LEFT: Poached elephant shot in South Luangwa, Zambia, 2001.

ABOVE: Shipping bill for a consignment of “stone statues” destined for Hong Kong.

CONCLUSIONS & RECOMMENDATIONS



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CONCLUSIONS

- The Government of China (GoC) has consistently failed to ensure meaningful enforcement of CITES regulations that prohibit the import and export of African elephant ivory, or to enact meaningful checks on its domestic ivory markets. As a result, illegal ivory has flooded China's domestic market.
- China's demand for, and consumption of, illegal ivory is fueling a renewed poaching crisis that is destroying elephant populations across Africa.
- Chinese nationals, companies and organized crime syndicates are implicated in the smuggling of vast amounts of illegal ivory and the consequent elephant poaching in Sudan, Central African Republic, Democratic Republic of Congo, Chad, Kenya, Tanzania, Zimbabwe, Zambia, Malawi, Mozambique, Nigeria, Cameroon, and Mali, and likely other elephant range states.
- The belated but commendable efforts to increase enforcement operations against large-scale ivory smuggling onto the Chinese market are inadequate to eliminate China's illegal ivory trade and the widespread elephant poaching that results from Chinese demand.
- Most of the ivory on sale in China today must have originated from illegal sources as legal stocks would have been exhausted years ago.
- Traders were allowed to register ivory with the government by stating they had forgotten to register it at the time of the 1989

CITES ban as "pre-convention", creating a major loophole for smuggled ivory to be legalized and subsequently sold onto China's flourishing domestic market.

- Government ivory stocks continued to be sold to domestic traders in the 1990's and 2000's, including via government owned companies. Moreover, illegal ivory seized by Chinese agencies is alleged to have disappeared into government ivory stocks.
- China failed to fully enshrine CITES-mandated bans on ivory exports and imports, or to close loopholes in its laws that enabled illegal ivory trade, for almost 17 years, until "The Regulation of the People's Republic of China on the Administration of the Import and Export of Endangered Wild Fauna and Flora" came into force on September 1, 2006.

RECOMMENDATIONS

- The Government of China (GoC) should ban all domestic trade in ivory within 60 days to avoid further ivory smuggling and stockpiling in anticipation of the 2008 Beijing Olympics.
- China does not meet the requirements of CITES Conf. 10.10 (Rev.Cop12) and the Standing Committee should not approve China's request to be an approved trading partner for any potential CITES-approved ivory auctions.
- All existing stocks of ivory should be seized and destroyed. Alternately, ivory stocks could be sealed and stored in secure, centralized facilities that can be independently monitored, including use of electronic surveillance technologies.
- The CITES Standing Committee should direct the Secretariat to ascertain the status and origin of existing Chinese ivory stocks, and report on any government auction of confiscated ivory into domestic markets.
- The highest levels of the GoC should commit to protecting elephants and other endangered species, including species not native to China.
- The GoC should enact a country-wide program to eliminate ivory trade and other endangered species trade. This should include establishment of a national network of dedicated enforcement staff, including investigators and prosecutors, based in all provinces and autonomous regions and municipalities.
- The GoC must substantially increase resources, staff and salaries to ensure the pro-active enforcement of CITES and other laws that protect endangered and threatened species.
- The GoC should increase enforcement training for staff to promote greater expertise in wildlife crime.
- The GoC should expand bilateral, regional and international enforcement cooperation to crack down on activities of Chinese nationals involved in organized criminal activity in Africa, including illegal trade in elephant products, other wildlife and natural resources including timber and minerals.

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