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For over 25 years as a nonprofit organization, EIA has pioneered the use of undercover investigations to expose environmental crime around the world. Intelligence reports, documentary evidence, campaigning expertise and an international advocacy network enable EIA to achieve far-reaching environmental protection by spurring changes in market demand, government policy and enforcement related to global trade in wildlife and environmental products.

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Cover:

Display of several grades of ivory *hanko* by a major manufacturer targeting *hanko* retailers. Japan has more than 8,200 retailers of ivory products.

Photo: JTEF, 2018

EXECUTIVE SUMMARY

Japan's demand for *hanko* made of elephant ivory is a modern phenomenon driven by the country's ivory industry.

Hanko is the Japanese term for the cylindrical name stamps used commonly throughout Japanese society to conduct many types of personal and professional business, much like handwritten signatures are used in the west. Today, Japan is the world's largest legal domestic ivory market and ivory *hanko* account for 80 percent of Japan's ivory consumption.

Since 1970, more than 262,000 elephants have been killed to supply ivory for Japan, mostly for *hanko*, even though elephant ivory is not a traditional *hanko* material.

Ivory *hanko* name seals became popular in the 1970s as the result of a clever marketing campaign designed by the ivory industry to increase sales. The success of the ivory *hanko* marketing campaign, which had penetrated Japanese society by the 1970s, drove the dramatic increase in domestic demand for ivory in Japan and ultimately led to Japan becoming the world's largest importer of ivory in the late 20th century. Although the market for ivory in Japan shrank along with other luxury goods from 1990-2010 during Japan's Great Recession, the registration of whole tusks for sale indicate that market demand for raw ivory for products like *hanko*, has risen steadily since 2011.

Unfortunately, Japanese law is wholly inadequate to prevent the laundering of illegal ivory onto the domestic market.

Because so much of the ivory sold in Japan is *hanko* and because processed ivory products, like *hanko*, are poorly regulated by Japanese law, EIA has been concerned for some time about the role that *hanko* retailers are playing in the illegal ivory trade and export.

In spring 2018, EIA initiated an investigation into the Japanese *hanko* industry.

Our snapshot investigation revealed that more than half of *hanko* retailers surveyed were willing to engage in the sale of ivory *hanko* knowing it is destined for export. Of these, most seemed to not know that export of ivory abroad is illegal; however, several shops aware of the illegality of export advised our investigator how to export ivory *hanko*. EIA's investigation demonstrates that the Government of Japan's illegal export "awareness campaign" – conducted over the past year



Ivory *hanko* display in an independent *hanko* shop.

to prevent and deter illegal activity – was ineffective and that Japan's *hanko* market remains awash with fraud, abuse, and misinformation.

Japanese government officials claim that there are meaningful controls in place to prevent illegal domestic ivory trade as well as illegal export of ivory; in fact, nothing could be further from the truth.

Japan's domestic ivory control law, the Law on the Conservation of Endangered Species (LCES), has fatal loopholes that have facilitated the legalization of large quantities of ivory for the domestic market without proof of legal acquisition and origin.¹ Moreover, once this dubious ivory is on the market, there is no way to track it as it moves from manufacturer to wholesaler to retailer. Recent amendments to the LCES, effective June 2018, are superficial reforms and do not address any of the major loopholes in the law.²

Japan's policies, which ultimately aim to promote and protect its ivory industry despite the elephant poaching crisis, are isolationist.

Leaders such as China, the United States and United Kingdom are taking action to close their domestic ivory markets while Japan makes hollow "reforms" to its ivory control laws that are half-hearted at best, purposefully misleading at worst. Even traditionally safe regions where elephants have roamed for decades without fear are no longer safe from poaching. It is time for the international community to demand that Japan shut down its legal trade in ivory, starting with ivory *hanko*, to protect elephants from ongoing slaughter.

History of Ivory in Japan

Japan began importing and carving ivory in small quantities in the 16th century.³ Imports only increased in the late 19th century when ivory carvings such as netsuke and other sculptures for westerners began to be mass-produced and often exported to Europe and the United States.⁴ From 1890 to 1909 Japan imported an annual average of about 16-17 metric tons of ivory, which tripled to 70.8 metric tons of tusks annually by the 1920s.⁵ After the Great Depression and World War II, some 70 metric tons of ivory on average were imported annually, which rose to 90 metric tons annually by the 1960s.⁶ However, imports skyrocketed in the 1970s and 80s, to some 476 metric tons annually at the peak, with *hanko* production accounting for half of the ivory imports.⁷

Ivory is not a traditional material for *hanko*.

Surge in Ivory *Hanko* Demand and Production

Hanko name stamps, also referred to as *insho* or *inkan*, play an important role in Japanese society and are used commonly to conduct many types of personal and professional business, much like handwritten signatures are used in the west. There are three different kinds of name seals, which are used for various purposes. *Hanko* have traditionally been made from materials such as wood, buffalo horn and stone, but ivory, plastic and titanium are also used.

While the use of *hanko* dates back thousands of years, the use of ivory for *hanko* is relatively recent – ivory is not a traditional material for *hanko*. It was the popularization of ivory *hanko* name seals in Japan in the early 1970s that caused domestic demand for ivory, and thus ivory imports, to rise dramatically.¹⁴ In the late 1960s and early 70s, the ivory industry launched a marketing campaign to increase

BOX 1 Japan's role in the historical devastation of African elephant populations

Africa's elephants numbered 1.3 million in 1979 and plummeted to 620,000 by 1989, with Japan playing a large role in driving the demand for ivory.⁸ Since 1970, Japan has imported ivory from more than 262,000 elephants.⁹ The estimate does not include any poached ivory smuggled into Japan since the 1989 CITES ban on international ivory trade, nor does it include tusks "registered" since 1995 by the Government of Japan for legal sale on the domestic market. Excluding the CITES approved tusk imports in 1999 and 2009 (5,446 and 3,419 tusks respectively), between 1995 and mid-2017, Japan registered some 18,977 ivory tusks without requiring proof of legal origin.¹⁰

In the decade before the 1989 international commercial ivory ban, from 1979-1988, Japan imported ivory from roughly 120,000 elephants into the country, about 40 percent of the ivory exported from all of Africa.¹¹ Even with such large numbers, Japan's trade in ivory, based on tusk number and weight, actually represents fewer elephants than trade elsewhere due to Japan's preference for large tusks from mature large male and female elephants.¹² With keystone herd members like matriarch leaders being removed from families, social group disruption was widespread.¹³ Japan's demand for elephant ivory, and namely for ivory *hanko* name seals, is largely responsible for the devastation of African populations before the 1989 ban.



Photos: EIA

ivory sales by trumpeting ivory as a luxury *hanko* material from the sacred elephant, bringing good fortune to those who possessed it.¹⁵ Using a variety of marketing techniques including catalog advertisements and door-to-door sales, use of ivory *hanko* became ingrained in Japanese society by the early 1970s. Therefore, the domestic demand for ivory in Japan and the destruction of elephant populations it caused is a modern phenomenon driven almost entirely by the *hanko* industry.

As a result of the increased use of ivory for *hanko*, the amount of ivory imported into Japan rose to 275 metric tons in 1972, twice as much as the previous year.¹⁶ Japan's ivory imports reached highs of 476 and 474 metric tons in 1983 and 1984, respectively. While the market for ivory shrank during the 1990s and early 2000s, this was largely due to Japan's major recession which occurred from about 1990-2010, during which the market for all luxury items in Japan shrank.¹⁷ However, sustained consumer preference for ivory *hanko* has continued and Japan's registration of whole tusks for sale and for processing into *hanko* has increased since 2011.¹⁸

Japan's domestic ivory market is unique in that it includes both newly crafted ivory products and antique items. Eighty percent of raw ivory consumed in Japan is for the creation of new *hanko* for sale

on the domestic market.¹⁹ According to the Government of Japan's reports from ivory dealers, the stock of ivory *hanko* totaled more than 750,000 in 2015.²⁰ *Hanko* accounted for more than 90 percent of ivory for sale on the e-commerce site Rakuten before it banned the sale of ivory in 2017.²¹ From 2008-2015, Yahoo! Japan generated US\$30 million (¥31 billion) in revenue from ivory tusks and products, largely from the sale of ivory *hanko*.²² The recent rise of internet ivory trade in Japan, particularly for *hanko*, is a clear indicator of the current vigor of the country's ivory market and sustained demand.



Japan's Broken Ivory Control System

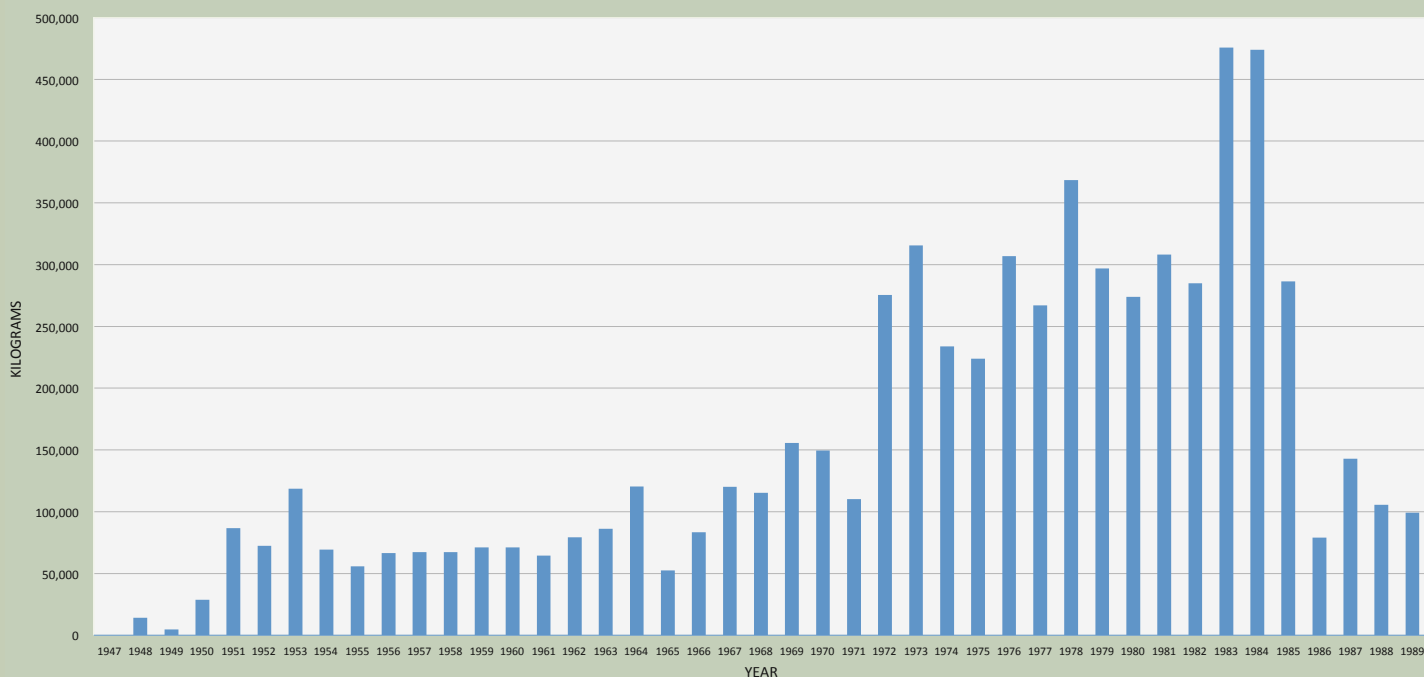
Japan is the largest remaining domestic ivory market in the world, with about 300 manufacturers, 500 wholesalers and 8,200 ivory retailers identified by the Government of Japan as of 2015,²³ and recent numbers indicate a substantial increase.²⁴ Unfortunately, Japanese laws and policies are wholly inadequate to prevent the laundering of illegal ivory onto the domestic market. Japan's demand for ivory has not only played a large role in the destruction of elephant populations, it has been instrumental in the deterioration of the international ivory ban and a driver of the current poaching crisis.



Photo: JTEF, 2018

Photo: EIA

FIGURE 1 Official raw ivory imports into Japan (1946-1989)



* Data from: Esmond Bradley Martin, 1985, Japan's Ivory Industry, WWF Japan. Kiyono H, 1997, The Ivory Trade in Japan, Still in Business: The Ivory Trade in Asia Seven Years After the CITES Ban, TRAFFIC International. Milliken, 1989, The Japanese trade in ivory: tradition, CITES and the elusive search for sustainable utilization, The ivory trade and Future of the African Elephant, Ivory TradeReview Group

Japan's domestic ivory control law, the Law on the Conservation of Endangered Species (LCES), has fatal loopholes that have facilitated the laundering of large quantities of ivory that cannot be proven to be legal onto the domestic market.²⁵ Moreover, once this dubious ivory is on the market, there is no way to track it as it moves from manufacturer to wholesaler to retailer.

The international agreement, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), Resolution Conference 10.10 *Trade in elephant specimens* requires, amongst other safeguards, "compulsory trade controls over raw ivory" and "comprehensive and demonstrably effective stock inventory, reporting, and enforcement systems for worked ivory."²⁶ Japan has a history of non-compliance with CITES Res. Conf. 10.10 (Rev.CoP17 and previous iterations), as its weak LCES controls illustrate, enabling the illegal ivory trade.²⁷

Recent amendments to the LCES, effective June 2018, are superficial reforms and do not address any of the major loopholes in the LCES.²⁸ In summary, the major flaws in the LCES are:²⁹

- The law does not require meaningful proof of legal acquisition and origin of whole tusks presented for registration, which is required to sell a whole tusk. In fact, third party statements, including from family members and friends, are readily accepted as adequate documentation of legality for tusk registration purposes despite extensive evidence of the presentation of fraudulent statements.
- Japan's LCES has never required marking or registration of cut raw pieces of ivory of 1 kg and 20 centimeters in height or larger.
- Cut pieces and processed or finished ivory, such as *hanko*, is not meaningfully regulated at all. A self-recording system exists whereby the process of cutting and transferring tusks is logged and reported to the Government, responding to its annual or biannual request, but this type of delayed self-reporting is useless and unreliable for compliance and enforcement purposes.

Since the majority of raw ivory in Japan is processed into *hanko*, this means that there is a very high probability that most of the *hanko* supply in Japan is derived from ivory that was never verified to be legal.

BOX 2 Japan's Largest *Hanko* Manufacturer Involved in Vast Illegal Trade³⁰

Takaichi Inc., Japan's largest manufacturer of ivory *hanko*, was accused by the Tokyo Metropolitan Police in 2011 of purchasing up to 58 unregistered and thus illegal tusks during 2010. It was alleged that between 2005 and 2010 up to 1,600 unregistered tusks were purchased and processed into ivory *hanko*. These illegal whole tusks weighing 15,770kg composed up to 87 percent of the officially registered whole tusks consumed for producing *hanko* during that timeframe, and were processed into between 167,400 and 473,100 individual *hanko* (33,480-94,620 annually). The former



president, Kageo Takaichi, and other employees were found guilty and minimum sentences were imposed, including Takaichi Inc. being fined a mere US\$12,500. The Takaichi case illustrates how pervasive loopholes in Japan's ivory controls, which persist to this day, have enabled large-scale illegality within the massive *hanko* industry.

Kageo Takaichi, the face of Japan's illegal ivory trade.

.....
"it should be all right if you send it together with other goods and do not mention 'ivory' on the outside of the package."

Investigation Results Confirm *Hanko* Trade is Ripe for Abuse

Recent investigations reveal that the majority of *hanko* retailers in Japan are willing to engage in the sale of ivory *hanko* knowing it is destined for export. Because so much of the ivory sold in Japan is *hanko*, and because processed ivory is essentially unregulated, EIA has been concerned for some time that *hanko* retailers may be playing a role in sending ivory illegally to China and other Asian states, or be susceptible to the influence of unscrupulous ivory traders.

Between March and May 2018, investigators contacted 317 *hanko* retailers in three large urban areas in Japan, near Tokyo, Osaka and Nagoya, and asked them: whether they sold ivory *hanko* and if they did, whether they were willing to either ship the

ivory *hanko* abroad or sell it to a customer knowing that the customer intended to take it out of the country. In the process of the inquiry, the investigators also learned whether the retailers were aware that shipping ivory *hanko* abroad is illegal.

The identified 303 *hanko* shops which dealt with ivory *hanko* (96 percent) fall into three categories: independent shops (231), franchise chain shops (55) and shops located inside shopping malls (17).

When asked whether they would be willing to ship ivory *hanko* to customers abroad, a blatantly illegal activity, three shops, all independent retailers, responded affirmatively. Employees from these shops even provided advice to their customers for how to do so without detection, which suggests they may have experience in exporting ivory in the past. For example, one shop told the investigator: "taking-out by non-business people does not matter while shops are prohibited to do so," "a small number of products are all right while a huge amount of raw ivory is problematic," "bringing as a gift is all right"

or “the products sold at our shops are all right because they are authorized by certification seal.”

The other shops advised the investigator how to export ivory *hanko* without detection, saying “it should be all right if you send it together with other goods and do not mention ‘ivory’ on the outside of the package.” Another shop advised the investigator about the timing of export to, “send it by May 25 at latest because no ivory will be permitted to bring outside of Japan from June 1 by a new law.”³¹

More than half (about 58 percent representing 175 shops) of the retailers investigated expressed a willingness to sell ivory to a customer knowing that the customer intended to take it out of the country. Of these, 102 shops seemed to not know that export of ivory abroad is illegal. About 42 percent of the shops that were contacted refused to sell ivory to a customer knowing it was destined for export.

A summary of these results is as follows:

- 96% of identified *hanko* shops (303 of 317) contacted confirmed they sold ivory.
- 1% of shops (3 of 303) attempted to sell ivory *hanko* illegally offering to export ivory for the customers through the shops knowing that such activity is prohibited.

■ 34% of shops (102 of 303) attempted to sell ivory *hanko* to the customer knowing the customer intended to send it abroad, but the shop appeared to not know that such export is prohibited.

■ 23% of shops contacted (70 of 303) refused to send ivory *hanko* abroad on behalf of the customer knowing it is prohibited. However, they attempted to sell it to the customers knowing that the customer intended to take it abroad.

■ 42% of shops (128 of 303) refused to sell ivory *hanko* at all knowing that the customer intended to sell it abroad.

In addition to the three shops that were willing to export ivory on behalf of their customers, it is also a serious concern that so many shops were willing to sell to customers knowing the ivory was to be exported. Equally as concerning is the fact that one-third of the shops investigated intended to sell it without apparently knowing it is illegal because such shops could be taken advantage of by smugglers intending to purchase ivory products to export illegally.

The results of the investigation confirm that, consequential to decades without oversight, the *hanko* industry in Japan is highly susceptible to involvement in the illegal ivory trade. The investigation also demonstrates that the Government of Japan’s illegal export awareness campaign,



Ivory *hanko* displayed and sold by wholesalers for retailers in Tokyo.

targeting shop owners and conducted over the past year (2017-2018), was ineffective. The cautionary message regarding illegal activity was ignored by one-quarter of the shops interviewed and apparently did not reach one-third of the shops investigated. It is clear that Japan’s *hanko* market is ripe for fraud and abuse and that current GoJ laws and policies are wholly insufficient to address the problem.

Ivory *hanko* available for purchase on Yahoo Japan

Japan's Refusal to Ban Domestic Ivory Trade

In response to the global poaching crisis that is plaguing Africa's elephants, the international community came together in 2016 at the 17th CITES Conference of the Parties (CoP17) and agreed by consensus that domestic ivory markets that contribute to poaching or illegal trade should be closed as a matter of urgency.

The Government of Japan claims that it is exempt from the resolution because its market is shrinking and it does not have illegal imports. This is a false interpretation of the language of the resolution, which plainly states that Parties with domestic ivory markets that contribute to poaching or illegal trade should urgently close them. It is also a misleading representation of the situation in Japan, where in fact there are literally thousands of ivory manufacturers and retailers, little to no border enforcement effort, and many examples of illegal ivory trade, particularly to China. In 2017, it was reported that of 148 seizures of ivory from Japan between 2011 and 2016, 106 were going to China.³² In fact, as recently as August of this year,

Chinese enforcement authorities seized a tusk from Japan that it detected in inbound mail, one of many such illegal shipments detected by Chinese customs in the past decade. In international law, the burden of proof for an exception or exemption is on the Party seeking the exemption. Japan has utterly failed to meet its burden.

While the Government of Japan continues to fight for its ivory industry and resists joining global leaders in protecting elephants, major Japanese private sector retail leaders have gone further and banned the sale of ivory products. Just after CoP17, three *hanko* retailers ceased selling ivory.³³ Major Japanese retailers Rakuten, AEON, Ito-Yokado, and Mercari, have also recently committed to ceasing all elephant ivory sales.³⁴ Meanwhile, Yahoo! Japan continues to sell thousands of ivory products on its platform with the backing of the GoJ.

Japan's existing legal market severely undercuts global efforts to stem the demand for ivory and to protect the world's remaining elephants. Illegal exports to China directly undermine China's newly implemented ban. By reinforcing its ivory market, Japan is stimulating the demand for ivory and justifying the demand for ivory *hanko*, even as a nontraditional item and one of the drivers of the illegal trade and ongoing decline in elephant populations.

BOX 3 Examples of Japan's Illegal Ivory Trade

Evidence indicates that illegal activity is prevalent within Japan's domestic ivory market and illegal export of ivory is enabled by the lack of enforcement. Some examples include:

- In a 2015 survey, 30 of 37 Japanese ivory traders contacted by an undercover investigator offered to engage in some form of illegal activity to buy, sell, or fraudulently register a tusk that did not qualify for registration.³⁵
- Undercover investigations in 2015 documented four Japanese ivory companies that admitted to conducting daily ivory sales to Chinese buyers and boasted of the vast amounts of ivory being illegally exported to China and Hong Kong.³⁶
- In 2015, an official at the Japan Wildlife Research Centre (JWRC), the Japanese government-appointed agency that is in charge of the registration of ivory whole tusks, advised an undercover investigator how to fraudulently register a tusk as legal and how to obstruct a potential police investigation.³⁷
- Since 2009, more than 5.8 metric tons of ivory destined for China from Japan have been seized, primarily in small packages by Chinese authorities.³⁸
- Between 2010 and 2012, 3.2 metric tons of ivory purchased on Yahoo! Japan were smuggled into China by one group without detection by Japanese authorities.³⁹
- Surveys of physical antique markets in 2017 identified rampant sales of illegal ivory.⁴⁰

CONCLUSION

Ivory *hanko* make up 80 percent of Japan's legal domestic ivory market. While ivory is not a traditional material for *hanko*, the popularization of ivory for *hanko* led by the ivory industry was a major driver of increased Japanese imports of poached elephant ivory in the 1980s. The demand for ivory in Japan has diminished over time but is still strong and appears to be increasing, particularly for *hanko*. Japan's flawed ivory controls enable the laundering of illegal ivory, mainly through the tusk registration system. As most of the processed tusks are turned into *hanko*, the majority of *hanko* are of questionable legality. Recent surveys of ivory *hanko* sellers highlight that the *hanko* industry is susceptible to abuse and fraud in trade and export and further that the GoJ awareness campaign to educate ivory retailers on the legal framework has been unsuccessful. While the international community turns to ending ivory trade to protect elephants from poaching, Japan resists and continues to support and reinforce its ivory industry.



Photo: EIA

RECOMMENDATIONS

Japan must urgently close its domestic ivory market consistent with CITES Resolution Conference 10.10 (Rev.CoP17) including:

- **banning the trade in ivory *hanko***
- **banning trade via internet platforms**
- **ceasing all registration of whole ivory tusks**

***Hanko* retailers must ban the use of ivory.**

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