



environmental
investigation
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JTEF
Japan Tiger and Elephant Fund

**Update: Tokyo Metropolitan Government's (TMG) Response
to JTEF and EIA Recommendations re: Ivory Subsidies**
July 2025

On June 11, 2024, Japan Tiger and Elephant Fund (JTEF) and the Environmental Investigation Agency US (EIA) submitted [a letter and a briefing](#) ("Tokyo Metropolitan Government Subsidies to Ivory Industry Stakeholders") to Tokyo's Governor Yuriko Koike. Subsidies provided by TMG were funding efforts to increase demand for elephant ivory and work towards opening international trade in ivory, directly contradicting efforts to reform Tokyo's domestic elephant ivory trade and international recommendations.

At the time, JTEF and EIA requested a response by June 28, 2024 to the following recommendations outlined in the document:

1. Stop any issuance of subsidies for projects aiming to help resume international trade in ivory, increase domestic demand for ivory crafts and products, or facilitate the trade in ivory as a matter of urgency by ceasing the ivory industry subsidization program entirely or allocating the funds to projects focused on the conversion of ivory to alternative materials and/or assistance for job-change.
2. Issue a public statement clarifying TMG's policies on ivory trade and the ivory industry to eliminate mixed-messages and demonstrate clear dedication towards reduction of ivory demand and restriction of legal ivory trade in the jurisdiction of Tokyo.
3. Heed the Advisory Council's recommendations and enact an ordinance adopted by the Tokyo Metropolitan Assembly to close the ivory market in Tokyo with only narrow exemptions.

Following receipt of the letter and briefing, JTEF and EIA were informed that TMG would consider implementing measures to address the recommendations, starting with conversations between the related TMG Bureaus, and JTEF and EIA decided to extend the originally requested deadline to enable more time for internal deliberation and action.

In response to the appeals, the Bureau of Industry and Labor revised the subsidy guidelines on October 15, 2024.¹ Specifically, the revised guideline limits the projects to be subsidized to "efforts to stabilize management based on appropriate trade" carried out by ivory industry groups. Accordingly, "projects aimed at transferring African elephants from Appendix I to Appendix II of the CITES in order to resume ivory imports, which are currently banned" and "projects aimed at stabilizing management of ivory businesses affected by the ivory import ban" are excluded from the subsidies. With this change to the subsidy guidelines, the first recommendation to cease subsidies intended to support the resumption of international ivory trade, increase domestic demand for ivory, or facilitate the trade in ivory, has been largely implemented.

However, EIA and JTEF are unaware of any progress regarding the other two recommendations. Representatives from TMG's Office of the Governor for Policy Planning responded to the two remaining recommendations verbally during an in-person meeting with JTEF. Regarding the second recommendation, to issue a public statement clarifying TMG's policies on ivory trade and the ivory industry, representatives provided an explanation of the [initiatives that Tokyo is already taking](#) and indicated that TMG would not be issuing a follow up statement.

Regarding the third recommendation, to enact an ordinance adopted by the Tokyo Metropolitan Assembly to close the ivory market in Tokyo with only narrow exemptions, representatives noted that TMG will promote appropriate ivory trade, and did not say if there were plans for an ordinance or not. Based on the dialogue in this meeting, it is our understanding that TMG, despite the recommendations of the Advisory Council, has no intention of considering enacting an ordinance to close the ivory market within Tokyo at this time.

EIA and JTEF continue to urge the Tokyo Metropolitan Government to address the remaining recommendations and to fully implement the [guidance of the Advisory Council](#) to contribute to global efforts to protect elephants from the ivory trade.

¹ Grant guideline on subsidies to the projects for stabilizing tortoiseshell industry and ivory industry dated October 15, 2024 (06-Ro-Kei-Shin-Ko No. 1464)