Japan's Domestic Ivory Market: MYTHS VS. REALITIES

Briefing Document for Delegates to CITES CoP20 | November 2025

Closing domestic ivory markets is critical to uphold the international ban on commercial ivory trade and protect elephants from poaching and illegal trade.

Resolution Conf. 10.10 (Rev. CoP19) gives CITES a clear mandate to address the closure of domestic ivory markets that contribute to poaching or illegal trade in order to support the implementation of the international ivory trade ban and to protect elephants from threats posed by consumer demand for ivory. While most major elephant ivory consumer markets have closed their domestic markets with limited exemptions as per Resolution Conf. 10.10 (Rev. CoP19) paragraphs 3, 4, and 5, there is one major outlier: Japan.

Historically, Japan has been a major player in the global ivory trade as a leading ivory consuming nation and the only country to have received ivory in both CITES-approved one-off sales. Instead of working to reduce demand, the Japanese government supports the ivory industry, as evidenced by its market regulations which are designed to facilitate trade in ivory products and its assertion that it is "inappropriate" to call for the closure of its ivory market.[1] Japan's 250-tonne, privately-held ivory stockpile is widely available to consumers. Amidst a sea of countries which work hard to enforce their domestic bans on ivory trade, Japan is an easy source of ivory for criminals looking to profit.[2] Japan's market is already being exploited by those seeking to bring ivory out of the country illegally, and will continue to be, as long as it remains open.

Japan's regulatory and enforcement actions to date have been inadequate to prevent its domestic market from contributing to the illegal ivory trade. All ivory markets fuel the demand for ivory, and the demand for ivory is what drives elephant poaching. It is impossible to stem the demand for ivory while simultaneously supporting the commercial trade in it.

INDUSTRY ACTION WITHOUT GOVERNMENT SUPPORT

After banning the sale of ivory on its platforms in 2019, Yahoo! Japan (LINE Yahoo) implemented revised policies on November 10, 2025 to restrict listings that might enable the laundering of ivory. This action followed the sentencing of Daigo Ivory Ltd., which pleaded guilty to intentionally circumventing Yahoo's policies for years.[3] Without legal and enforcement support from the government, the burden is on companies to prevent illegal ivory transactions.

RECOMMENDATIONS

TO THE 20TH CONFERENCE OF THE PARTIES

- Adopt the draft decision in Doc. 76.2 Annex 2 inviting Japan to prohibit domestic trade in ivory for commercial purposes, with limited exemptions.

TO JAPAN

- Revise the Act for the Conservation of Endangered Species (ACES) to close the market for elephant ivory with legitimate limited exemptions during the current statutory review period.
- Make a public commitment to closing the domestic ivory market and confirm support for the international ban on commercial ivory trade.

1 https://cites.org/sites/default/files/documents/E-CoP20-Inf-024.pdf

2 https://www.jtef.jp/en/smugglers-source-cop19_e/

3 https://eia.org/blog/japanese-ivory-traders-arrested-for-alleged-illegal-elephant-ivory-sales/

ADDRESSING MAJOR MYTHS ABOUT JAPAN'S DOMESTIC IVORY MARKET

✕ MYTH In Japan, commercial trade in elephant ivory is prohibited in principle.

✓ REALITY

- All pre-Convention ivory and ivory imported in the two CITES-approved sales, except for unregistered whole tusks, can be traded in Japan. Any ivory for sale is assumed to be legal even though its origins might not be.
- The broad exemptions to prohibitions on trade are designed to facilitate and enable the trade in ivory. Japan's stockpiles, all privately-held, include 176 tonnes of whole tusks, 76 tonnes of cut pieces, and 4.6 million individual items.[4]

✕ MYTH Japan's domestic ivory market is rigorously controlled.

✓ REALITY

- While Japan has consistently reported on measures taken to attempt to prevent poaching or illegal trade, as per Decisions 18.117-119, these measures are insufficient and ineffective. Japan's ivory trade controls are riddled with loopholes that have the potential to enable the laundering of illicit ivory and enable illegal export.[5] Details on these loopholes and insufficient regulatory measures can be found in Japan's reporting on Decisions 18.117-119.
- Japan's whole tusk registration system is the only point at which origin and acquisition of ivory is assessed, and for more than 20 years this system was abused.
- The whole tusk registration requirement can be easily evaded by cutting a tusk into pieces since cut pieces are not required to be registered.
- Japan's disjointed and outdated tracking system cannot ensure traceability of ivory from whole tusk to worked product.
- Most ivory items in Japan (like *hanko*, signature seals) are small and do not meet the requirements for traceability information.
- Efforts to prevent illegal export are built around raising awareness, which only serves to dissuade those who might unintentionally export ivory. For those intent on breaking the law, this does not deter export.

✕ MYTH Japan's domestic ivory market is not contributing to illegal trade.

✓ REALITY

- Illegal exports of ivory from Japan, including items purchased legally in Japan's domestic market, do contribute to the illegal international ivory trade. ETIS data clearly indicate that Japan is implicated in illegal trade.
- According to the ETIS data aggregates there were 321 ivory seizures (3.6 tonnes) connected to Japan between 2008 and 2025. Of those seizures, 267 out of 321 seizures (83%) and 3,022 out of 3,634kg (83%) were reportedly made outside of Japan.
- In SC79 Doc. 6.6 Annex 1 – China's Report on Efforts to Combat the Illegal Ivory Trade, China states that Japan is one of the main countries where Chinese tourists purchase ivory souvenirs that are later seized by China.
- The ETIS data and Network Analysis presented in CoP20 Doc. 76.5 contain the following information on Japan's role in the illegal international trade:
  - » Most worked ivory seizures (56%) occurred in China – and Japan was linked to an estimated 10% of China's worked ivory seizures (Annex 2C).
  - » In 2023, a seizure of 710 pieces of worked ivory was made in Japan from a sea freight shipment reportedly destined for Thailand.

✕ MYTH Japan's domestic ivory market conforms with CITES.

✓ REALITY

- CITES Resolution Conf. 10.10 (Rev. CoP19) paragraphs 3-5 urge the closure of domestic ivory markets that contribute to poaching or illegal trade.
- Evidence confirms that Japan's legal ivory market is contributing to the illegal international ivory trade, which is sufficient to warrant the closure of Japan's market.
- Japan maintains its legal domestic market despite the overwhelming evidence that it contributes to illegal trade and therefore it is not in alignment with CITES.

4 https://cites.org/sites/default/files/documents/E-SC78-65-04.pdf

5 https://eia.org/wp-content/uploads/2023/10/SC77-EIA_JTEF-Japan-Briefing-_FINAL_31-Oct-2023.pdf
https://eia.org/wp-content/uploads/2022/10/EIA_US_CoP19_Ivory_report_1022_US_Format_FINAL.pdf
https://eia.org/wp-content/uploads/2022/03/Last-But-Not-Least_EIA-JTEF_March-2022.pdf

environmental investigation agency

Japan Tiger and Elephant Fund