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EBBING AWAY

HONG KONG'S IVORY TRADE

Wilson Lau



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LIST OF ACRONYMS AND ABBREVIATIONS

AFCD	Agriculture, Fisheries and Conservation Department
Cap.	Chapter number of Hong Kong Ordinances (Legal Acts)
Cap. 586	Protection of Endangered Species of Animals and Plants Ordinance
C&ED	Customs and Excise Department
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COBRA III	Operation COBRA III was a collaborative international law enforcement operation aimed at combating wildlife crime and bringing criminals to justice. The operation was completed in May 2015.
CoP	Conference of the Parties (to CITES)
ETIS	Elephant Trade Information System
TWIX	Trade in Wildlife Information eXchange
Hong Kong SAR	Hong Kong Special Administrative Region of the People's Republic of China
NGO	Non-governmental organisation
NIAP	National Ivory Action Plan
OSCO	Organised and Serious Crime Ordinance
Pre-Convention	Ivory products that were acquired before 1975 for Asian Elephants and 1976 for African Elephants (Environment Bureau and AFCD, 2016)
Post-Convention	Ivory products acquired before Hong Kong implemented the international trade ban in 1990 (i.e. between 1976–1990), which have been registered by AFCD (Environment Bureau and AFCD, 2016)
USA	United States of America

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EXECUTIVE SUMMARY

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EXECUTIVE SUMMARY

Hong Kong¹ successfully passed a law to ban elephant ivory trade in 2018; a monumental step that recognises the need for robust action to stem the elephant poaching crisis, and the city's contribution to this through trade. Once implemented and enforced, this ban will likely put an end to an industry that once characterised Hong Kong as a global wildlife trade hub and centre for ivory production in the 1970–1980s. An international trade ban that was agreed by Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1989 had instigated the decline in the territory's ivory industry, but subsequent resurgence in demand from mainland China during the ensuing decades of rapid economic development gave considerable stimulus to the local ivory industry. This was in part due to demand from visiting Chinese tourists, which led to large flows of both legal (pre-Convention) and illegally-sourced ivory in and out of Hong Kong. Remedial measures adopted by the Hong Kong Government to strengthen licensing, monitoring and law enforcement of the local ivory market were initiated in 2015, but vocal public opposition to continued ivory trade and bold ambitions from other major ivory markets (mainland China, USA and others) provided the enabling conditions to propose a near-complete ban on ivory trade in the territory.

This report assessed the outcomes of Hong Kong's ivory market phase-out plan, of which the first two phases banning the trade (import and re-export) of ivory has been in place since 2018. Surveys of the territory's physical and online markets assessed the impact of the phase-out plan on domestic trade activities, and the readiness of ivory traders for the impending closure of the local ivory market at the end of 2021.

Physical market surveys conducted for this report in late 2019 found fewer outlets with ivory for sale compared to previous surveys in 2015. In 2019, 48% of the outlets surveyed were found with ivory (60 outlets), compared to 56% (74 outlets) in 2015; there were also more outlets surveyed in 2019 than 2015, with 51 new outlets surveyed. Despite this, the number of observable ivory items being offered for sale remains extraordinarily high, roughly estimated to be a minimum of 39,000 items, making it a nigh impossible task to liquidate within the limited timeframe (by end of 2021) and narrowed market of selling to local buyers. A few traders spoke of benefitting in the short term from the residual interest of existing clients who are trying to make ivory purchases before such sales are phased out, while online markets are evidently providing another avenue for liquidating ivory stocks. Online surveys for this report found 72 sellers with 196 ivory items listed for sale on three prominent e-commerce platforms between November 2018 and October 2019. This

prevalence of online offerings also present challenges for law enforcement given the borderless nature of online trade.

Scrutiny of the ivory industry in past years may have led to an increase in traders strictly refusing to sell to customers intending to take ivory out of Hong Kong, however the current survey found 32% of traders with ivory displayed suggesting that small ivory items could be hidden in baggage during border crossings to evade detection. Compliance by outlets found with ivory to display their possession licence was higher in the 2019 survey (at 57%) compared to findings in 2015, but still short of complete compliance, despite it being a mandatory measure, and a useful signal for consumers in distinguishing legal ivory traders. Hong Kong's licence display requirements, which should be placed in view at physical premises, do not appear to extend their mandatory coverage to online ivory traders. As such, legality may be claimed by the online seller, but the onus is on the buyer to understand the regulations and actively seek legality proof from the seller. This is coupled with the vast scale and increasingly encrypted nature of online selling and transactions, which can make non-compliance difficult for law enforcement authorities to identify. One indication that suggests online traders in Hong Kong remain less under scrutiny than their counterparts in mainland China is the lack of sophistication in the code words used in the territory, compared with mainland traders who typically have to make use of elaborate and seemingly obscure code words to evade detection when listing their ivory stocks for sale online.

The implementation of the domestic ban on ivory trade at the end of 2021 should provide much-needed clarity for determining legality of ivory items by effectively rendering nearly all ivory products illegal to sell. However, there is concern that with large volumes of commercial ivory to be reclassified as personal possessions, the current lack of a management system to monitor and audit such privately-held ivory in the territory could lead to it being laundered for sale in the legal ivory antiques market. As no records are kept for non-commercial ivory, it will no longer be possible for law enforcement authorities to establish if laundering has occurred with previous commercial ivory stocks.

Beyond the domestic market, Hong Kong continues to be a conduit for the flow of illegal ivory, with some of the largest ivory shipments on record being seized in the territory in recent years. Such seizures suggest the involvement of organised criminal syndicates, but few of these cases involving large-scale illegal ivory lead to successful prosecutions. This may be an indication that more expansive investigations are necessary, including "follow-the-money" approaches to identify the financial beneficiaries, and potential perpetrators, of these crimes. To date, there has been no money laundering prosecutions of environmental crimes in Hong Kong, including endangered species smuggling, illegal logging and fishing (LegCo Secretariat, 2020). Ivory seizure incidents are also dominated by illegal imports, which could imply a gap in law enforcement effectiveness at ports for illegal re-export and transit trade.

¹ Hong Kong Special Administrative Region of the People's Republic of China, herewith referred to as "Hong Kong".

The report recommends that the following actions should be taken immediately by the Hong Kong Government, to be led by the Agriculture, Fisheries and Conservation Department (AFCD) and involving other key government departments such as the Customs and Excise Department (C&ED) and the Hong Kong Police Force, during the remaining period prior to the domestic ban on ivory trade:

- **Strengthen international co-operation and intelligence sharing** – to improve current communication practices and advocate for more decentralised and instantaneous intelligence sharing on illegal wildlife trade with law enforcement counterparts, whether bilaterally or with a group of countries and territories in the Asia region;
- **Improve the mechanism for determining ivory antiquity, and maintain oversight of the antique ivory trade post-ban** – refine the criteria and improve rigor for determining antiquity of ivory pieces through engagements with legitimate private sector entities with interest and experience in authenticating antiques, such as auction houses and museums. Consider reinstating possession licences for traders of antique ivory, and conduct a stocktake of antique ivory in Hong Kong so that available antiques for commercial trade can be appraised, registered and labelled, prior to the domestic ivory ban at the end of 2021. The use of appropriate measures and technology (e.g. indelible marking, blockchain sequencing) to allow traceability of the antique ivory trade should also be considered, a registration system which would likely be welcomed by bona fide collectors and antique auctions industry. Given the lengthy process of amending legislation to reintroduce possession licences for antique ivory trade, AFCD should at least be carrying out regular checks, inspections and tallies of commercial antique ivory stocks (with reference to a stock registration system) at least on an annual basis from 2021 onwards;
- **Registration of ivory stocks in private possession** – as well as the 51 tonnes of post-Convention ivory stocks (as at 31st December 2020) registered for commercial trade. This would enable continued tracking of ivory stocks within the territory, which is critical to prevent and identify incidence of illegal trade after the domestic trade ban at the end of 2021. While this would be a considerable undertaking, there are good overseas precedents for such efforts, including Thailand in 2015. In the absence of an immediate change in policy, the Hong Kong Government should formulate an effective law enforcement strategy to maintain monitoring of pre-1990 ivory stocks after the 2021 ban comes into effect, via routine inspections and risk-based surveillance. The current legislation (Cap. 586) does not include this provision to enable registration of privately-held ivory stocks, and would require an amendment to the law to enable this to happen. In the absence of an immediate change in policy, the Hong Kong Government should formulate an effective law enforcement strategy that facilitates the tracking of ivory stocks that were classified for commercial trade prior to the 2021 ban coming into effect. This should include increased targeted and risk-based surveillance, as

well as routine inspections of commercial stocks ideally on a quarterly basis within 2021 prior to the ban, and once annually thereafter of the same stocks to guard against any wholesale ivory movements of current commercial stocks.

- **Effective Enforcement of Licensed Traders in physical and online markets** – AFCD should recommend possession licence holders provide proof of legality via images of licences and product hologram labels in online ivory listings, where the intention is commercial trade. This should be communicated as soon as possible and maintained after 2021 for the trade of registered antique ivory online. Closer collaborations between relevant government agencies and internet companies are encouraged, including facilitating investigations of suspicious listings, as well as working with NGOs to monitoring online ivory trade;
- The mandatory licence and poster displays for ivory traders in the physical market should be reinforced so that more complete compliance can be achieved; while submission of transaction records by ivory traders should be done on a monthly basis, prior to the domestic ivory trade ban, so that irregularities can be responded to on a timely manner;
- **Improving detection capacity at major ports** – especially at land and sea ports that have previously recorded fewer seizures, as well as improving intelligence and detection protocols at all points of entry and exits, including the Hong Kong International Airport;
- **Strengthening powers to investigate and prosecute wildlife offences through its inclusion into the Hong Kong Organised and Serious Crime Ordinance (OSCO)** – the enhanced investigative powers could facilitate follow-the-money investigations to target financial beneficiaries of wildlife crime, and thus enable pursuit and prosecution of those behind illegal wildlife trade for money laundering offences;
- **Multi-sectoral strategy for tackling wildlife trafficking** – foster a vision and pathway forward with a coordinated approach across government departments and the private sector toward ending illegal trade in ivory and other wild fauna and flora in Hong Kong, through the development of joint strategies and compliance-driven actions. This could be modelled after existing collaborative, multi-stakeholder approaches such as the territory's development process for the Biodiversity Strategy and Action Plan. A key element of this would be for the government to build up the capability of other sectors to recognise and report on suspicious wildlife shipments (i.e. at airports, cargo terminals, couriers and freight forwarders) and money flows that could amount to money laundering (i.e. with the Joint Financial Intelligence Unit and other financial institutions), and to trigger investigations based on these "suspicious transaction reports" (STRs). A useful starting point is to build on existing multi-stakeholder entities, such as Hong Kong's Wildlife Crime Task Force and the Hong Kong Endangered Species Advisory Committee, and to encourage more joint, proactive actions with industry and NGOs to combat illegal wildlife trade.

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INTRODUCTION

1. INTRODUCTION

Hong Kong was one of the first jurisdictions to consider instituting a near-ban on elephant ivory trade, in response to the escalating elephant poaching crisis. The then Chief Executive of Hong Kong, Leung Chun-Ying, first floated the intention to ban ivory trade in his 2016 Policy Address (HKSAR Government, 2016), and throughout subsequent deliberations had received overwhelming support from legislators towards the proposed bill to phase out local ivory trade. Passed into law in early 2018, the amendment of the Protection of Endangered Species of Animals and Plants Ordinance (Cap. 586) enacted the ivory ban in three phases (Box 1). While the first two phases ended the import and export of elephant trophies and pre-Convention ivory in 2018, the commercial sale of registered ivory within Hong Kong is still permissible, under licence, until the end of 2021. The legal market for ivory trade in Hong Kong has therefore narrowed; ivory can still be sold but cannot be taken out of Hong Kong—largely limiting the market to residents.

The phasing out of ivory trade spells a near end to a once thriving industry in Hong Kong that rose to prominence during the 1970–80s, when it became a centre for ivory carving and prominent producer of worked ivory (Milliken and Melville, 1989). This industry declined considerably in the following decade after the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) imposed an international trade ban in 1989, from a decision at the 7th Conference of the Parties (CoP) to CITES. However, a surge in new demand from mainland China since mid-2000 revived Hong Kong's ivory trade, in part through Chinese tourists driving retail sales in the territory. It led to substantial flows in the import of legal, pre-Convention ivory to Hong Kong and seizures cases, peaking in 2013–2014, an exponential rise when compared to a decade earlier (Lau *et al.*, 2017). Similarly, demand for raw and worked ivory materials globally has caused elephant poaching to intensify, with an estimated decline in population of 104,000–114,000 elephants during the decade prior to 2016 (Thouless *et al.*, 2016), prompting CITES to require countries or territories of “primary concern” in the illicit ivory trade to develop National Ivory Action Plans (NIAPs). These time-based action plans compel the relevant CITES Parties to place renewed attention on establishing effective ivory trade policies, licensing measures and enhance law enforcement capacities.²

In 2015, Hong Kong committed to a series of 10 measures within its NIAP ranging from a more collaborative approach to law enforcement, a sniffer dogs programme, forensic testing, as well as a comprehensive stocktake of registered ivory and product labelling (CITES, 2015; AFCD, 2015; Lau *et al.*, 2017). The resolution to take regulatory action with the phase-out of ivory trade in Hong Kong, going beyond the 10 measures, acknowledged public

Demand for raw and worked ivory materials globally has caused elephant poaching to intensify, with an estimated decline in population of

104,00–114,000

elephants during the decade prior to 2016

² CITES National Ivory Action Plans, <https://cites.org/eng/niaps>

pressure and democratic debate in Hong Kong's Legislative Council, and follows the ambitions of mainland Chinese and US governments at the time to take far-reaching actions to stymie the elephant poaching crisis.

Hong Kong's ban provides much needed clarity for determining legality of ivory items in trade, by effectively rendering nearly all ivory products illegal to sell. Prior to the legislative change, post-Convention ivory (ivory acquired during 1976–1990) could legally be sold in Hong Kong, but determining the age of ivory requires DNA analysis, which is impractical for the browsing consumer to verify. Nor was it possible with law enforcement officers to assess compliance of traders.

The phased approach to implementing the ivory ban allows a four-year grace period for traders to liquidate their ivory products. However, many contended that granting such a lengthy period for trade provides an opportunity window for potential illegal activities to persist. Indeed, a key driver for the ban is that while the city possesses one of the largest retail stockpiles in the world (Martin and Vigne, 2015), market regulations that were previously in place were insufficient in impeding the laundering of newly acquired ivory (Lo and Edwards, 2015; ADMCF *et al.*, 2016).

With less than two years before the domestic ban comes into force, this contemporary report examines the status of ivory trade in Hong Kong and the readiness for the closure of the ivory

market. Importantly, the report explores whether additional measures are warranted to prevent illegal opportunities.

Hong Kong's ivory market was assessed through surveys of the physical market, as well as an assessment of ivory seizure data and court penalties. This is compared with market findings from previous studies (Martin and Vigne, 2015; Lau *et al.*, 2017) to evaluate the relative changes that have occurred both prior to and after the enactment of the law to close Hong Kong's ivory markets.

Online markets for ivory trade in the territory were also examined. There are no known studies of online ivory trade in Hong Kong, a crucial gap that needs to be urgently addressed in more depth, given the prevalence of ivory trade—whether legal or illegal—in markets across Asia (Nguyen *et al.*, 2018; Kitade and Maruse, 2018; Phassaraudomsak and Krishnasamy, 2018; Xin and Xiao, 2019). Hong Kong has an expansive e-commerce sector and buying online is commonplace amongst local consumers, with 70% of the consumer population said to have made a purchase online (of any commodity) in the past month (when examined in July–September 2019; Kemp, 2020). An understanding of the scale and nature of Hong Kong's ivory trade online is needed, especially as the challenges for law enforcement of online markets are likely to differ with physical markets, due to the sheer scale of the monitoring effort needed and the borderless nature of online trading.



LEGISLATIVE AMENDMENTS

2. LEGISLATIVE AMENDMENTS

2.1 IVORY BAN PHASES AND POSSESSION LICENCES

Amendments to the Protection of Endangered Species of Animals and Plants Ordinance (Cap. 586) came into effect on 1st May 2018. These amendments not only moved to ban the local and international trade in ivory within Hong Kong (Box 1), but also introduced more stringent penalty measures on convictions related to illegal ivory trade (section 2.2).

There were also some requisite licensing changes prior to the legislative amendment in 2018. As a grace period has been given to licensed ivory traders to possess and trade in ivory, for commercial purposes, during 2018–2021, all individuals that possess ivory and intend to trade in ivory during this grace period will need to apply for a Licence to Possess, if not already obtained. This is particularly relevant for those that are in possession of ivory for non-commercial purposes and wish to switch the purpose of their possession to commercial status to enable sale of ivory. It also applies to those in possession of pre-Convention ivory defined as commercial, which was previously exempt from the licensing requirements. New licence applications were only accepted prior to 1st May 2018 for those switching from non-commercial to commercial status, and 1st August 2018, for pre-Convention ivory. All such licences will expire on 31st December 2021, when the near-complete ban on local ivory trade will come into effect. The trade in antique ivory will be exempted from the ban (Box 1), and does not

BOX 1

Three step plan to phase-out local ivory trade (Source: AFCD, 2018a)

Step 1: Ban the import and re-export of all elephant hunting trophies and those remaining post-Convention ivory items, the import, export and re-export of which are currently permissible under CITES. This step will discourage killing of live elephants, for example through sport hunting. Commenced on 1st May 2018;

Step 2: Ban the import and re-export of pre-Convention ivory (save for antique ivory) and subject the commercial possession of pre-Convention ivory (save for antique ivory) in the local market to licensing control similar to the existing control on post-Convention ivory. This step will prevent possible laundering of illegal ivory. Commenced on 1st August 2018; and

Step 3: Ban the possession for commercial purposes of all ivory (save for antique ivory) including pre-Convention ivory and post-Convention ivory from 31st December 2021.



Purported antiques such as this bangle will have to provide proof of its antiquity through documentation and/or a qualified appraisal. Credit: TRAFFIC.

require a Licence to Possess in order to import, re-export or possess for commercial purposes, but rather have to meet the following requirements (AFCD, 2018b):

- Possess a pre-Convention certificate (obtained from the country of export);
- The antique ivory was imported before 6th August 1976;
- If imported on or after that date, the import was not in contravention of any provisions of the Animals and Plants (Protection of Endangered Species) Ordinance (Cap. 187) or Cap. 586.

Above all, the ivory has to be proven as antique, which can be achieved via a qualified appraisal or other methods to determine the age and provenance of the ivory, such as the use of family photos, ethnographic fieldwork, ageing tests through an accredited laboratory, etc. (AFCD, 2018b).

2.2 REVISED MAXIMUM PENALTIES

The amendment of Cap. 586 had increased penalties to a maximum of 10 years imprisonment and HKD10 million (~USD1,29 million) in fines for indictable offences, and 2 years imprisonment and HKD5 million (~USD645,145) fines for summary offences (Table 1). This was a significant increase from the pre-amendment maximum of 2 years imprisonment and HKD5 million (~USD645,145) in fines (HKSAR Government, 2018).

Judicial rulings and penalties for ivory trafficking crimes are an important aspect of the risk equation for would-be smugglers, and the higher maximum penalties could have a deterrent effect on criminals and syndicates considering Hong Kong as a transit or destination for illicit wildlife products. These revised penalties are generally considered to be comparable to those of laws governing the trade (import, export or possession) of other controlled items

(AFCD, 2018a), and importantly recognises wildlife crime as a serious crime, with its legal separation of summary and indictable offences. The latter offence type is triggered based on the complexity of the case, quantity and endangered status of the species involved, and likely imposed sentence on the offender upon conviction.

While all indictable offences are considered predicate offences for money laundering in Hong Kong, rendering the proceeds of crimes as specified in Cap. 586 to be constituted as money laundering (FATF, 2019), the powers to investigate for this are limited. As Cap. 586 is not currently listed on Scheduled 1 of OSCO, which refers to different Ordinances and specific offences within those Ordinances, the enhanced powers to investigate wildlife crimes for money laundering offences under OSCO cannot be used by the relevant enforcement agencies, i.e. Hong Kong Police Force and C&ED.

TABLE 1

Revised penalties (HKD) for summary and indictable offences for wildlife crime, under the 2018 amendment of Cap. 586

	FOR SUMMARY OFFENCES	FOR INDICTABLE OFFENCES
Appendix I species	A fine of HKD5,000,000 and imprisonment for two years	A fine of HKD10,000,000 and imprisonment for 10 years
Appendix II and III species	A fine of HKD500,000 and imprisonment for one year	A fine of HKD1,000,000 and imprisonment for seven years

2.3 IVORY SEIZURES

A review of ivory seizures in the recent six-year period (2014–2019) appears to show a decline in the number of seizures in Hong Kong. Over 100 cases of ivory seizures were recorded annually during 2014–2015, compared with about half this number in 2016–2018, and a low of 23 cases in 2019 (AFCD, 2020a) (Figure 1). The quantity of ivory seized fluctuated in proportion to the number of seizure cases, although this trend is punctuated by one large-scale seizure in 2017 of 7,200 kg, which at the time was the world's largest ever ivory seizure (and recently exceeded by successive seizures in Viet Nam, mainland China and Singapore in 2019) (TRAFFIC, 2017; EIA, 2019, TRAFFIC, 2019a, TRAFFIC 2019b). This single seizure case, estimated to be worth HKD72 million (USD9.3 million), is greater than the value of all other ivory seizures during 2014–2019 combined.

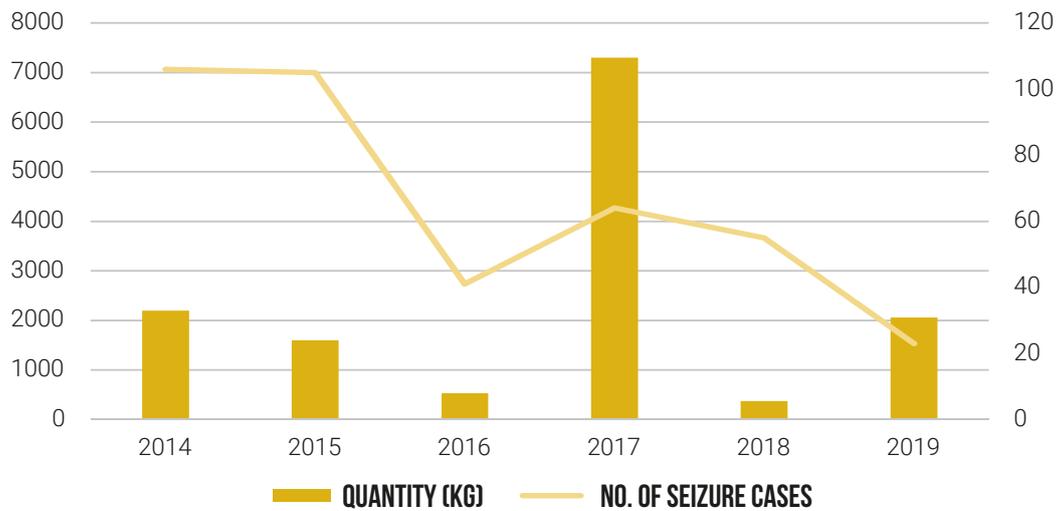
The majority of ivory seizures during this period were intercepted at import (364 cases), while just 26 ivory cases were seized during export and transit/transshipment. There was a parallel bias towards interceptions occurring at the

airport (93%) than at sea (ports) and land borders. This may indicate that there are far more attempts at ivory trafficking into Hong Kong via air transport, and fewer chances of being detected due to higher volumes of cargo throughput at land and sea ports. What it might also suggest is inadequate oversight of Hong Kong's land and sea borders for illegal ivory, signalling where increases in enforcement capacity can be prioritised.

Seizures over the six-year period (2014–2019) highlight the role of Nigeria as a source/transit country for ivory seized in Hong Kong (24% of illegal ivory imports), as well as South Africa (12%) and other African countries. A previous study had found nearly one fifth of all ivory seizure incidents in Hong Kong during 2013–2017 to have transited through the United Arab Emirates' airport, especially Dubai (ADMCF, 2018). Most of the inbound ivory seized at Hong Kong borders did not have information of a possible onward destination for the products, while those that did simply reported Hong Kong as the destination (ADMCF, 2018). Other researchers have

FIGURE 1

Number of cases (line graph) and quantity (column graph) of ivory seizures in Hong Kong, kg and no., respectively. Source: AFCD (2020).



suggested that the ivory cargoes intercepted in Hong Kong are destined for mainland China (Martin and Vigne, 2015). This is conceivable given Hong Kong’s sizeable intermediary role for merchandised goods between mainland China and the rest of the world, although better examination of arrested

smugglers or interviews with jailed offenders is needed to confirm this (Lau *et al.*, 2017). The majority of illegal exports of ivory were intended for mainland China, and to a limited degree, illegal shipments to Viet Nam and Malaysia seized on departure.

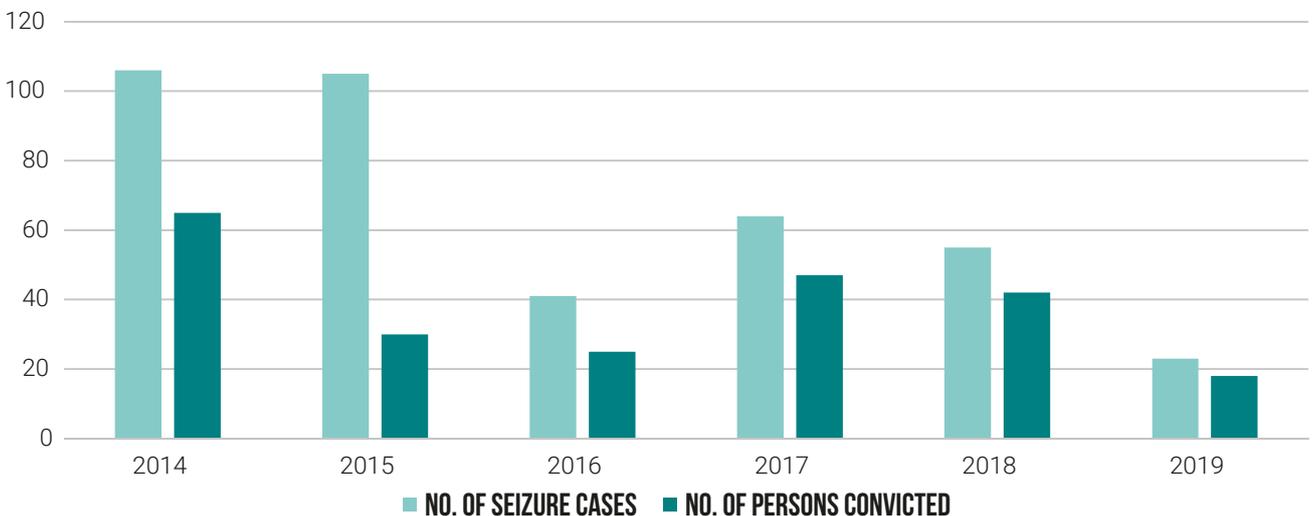
2.4 CONVICTIONS AND PENALTIES

In general, the increasing numbers of ivory interceptions at airports are more likely to lead to arrests of individual smugglers, where the product is hidden on the offender’s person, compared with smuggling via parcels or sea cargo, which tend not to be accompanied by a smuggling individual. A previous analysis of Hong Kong wildlife seizures found prosecutions tend to occur when a person was

found in ownership/charge of the contraband at the point of seizure, although the arrested individuals are more likely to be carriers/mules than the traders behind the trafficking syndicates (ADMCF, 2018). The higher rate of smuggled ivory detection at airports should therefore be driving greater levels of arrests and convictions. Indeed, the rate of conviction for ivory crimes does appear to have improved in

FIGURE 2

The number of ivory seizure cases and number of persons convicted in Hong Kong, 2014–2019. Source: AFCD (2020a).



Hong Kong over time, as Figure 2 indicates, from a low of 30 persons convicted out of 105 ivory seizures in 2015 (25%), to 18 convictions out of 23 seizures in 2019 (78%) (AFCD, 2020a). As there were sometimes more than one person involved per case, the total proportion of cases that led to successful conviction can be assumed to be even lower, although this rate of conviction for ivory is higher than cases of other endangered species.

While the aforementioned changes to maximum penalties provides the framework for sentencing with greater deterrent effect in Hong Kong courts, offences under Cap. 586 have typically been considered low and disproportionate to the seriousness and value of the crime. In general, these offences are liable to a Level 6 fine (HKD100,000 or USD12,903) and one-year imprisonment.

During the period 2014–2018 where published data are available, the highest penalty handed down was eight months imprisonment for ivory crimes, while fines have been as low as HKD2,000 (USD258). This was during a period prior to the

amended legislation, when the maximum penalty under Cap. 586 was two years imprisonment. Court monitoring since May 2018, when the legal amendment came into effect, shows progressively higher penalties and cases being heard in the District Court (ADMCF, 2018).

Much lower fines were meted out for seizures of other endangered species compared to ivory. For example, in 2014, a total of HKD2.3 million (~USD296,767) in penalties involved ivory smuggling cases, whereas HKD0.6 million (~USD77,418) was fined for other illegal endangered species cases, despite there being more endangered species cases combined than ivory (106 out of 461 cases were ivory).

Fines are also just a fraction of the total estimated market value of ivory seizures. e.g. HKD100,000 (~USD12,903) in fines was issued in 2018, compared with the combined estimated value of HKD4 million (~USD516,116). Although penalties could also be in the form of imprisonment, which is not substantiated monetarily.

METHODS



3. METHODS

Assessments of Hong Kong's domestic ivory markets were carried out in 2018–2019, including surveys of:

- Physical markets in Hong Kong, revisiting locations surveyed in Lau *et al.* (2017);
- Online markets, including selected e-commerce and social media platforms.

3.1 PHYSICAL MARKET SURVEY

A full replication of the Lau *et al.* (2017) study was conducted, revisiting the same outlets that were surveyed in 2015. A total of 151 outlets were surveyed in the current study during August–October 2019, which included 100 outlets visited in 2015 (from a list of 131 outlets), as well as an additional 51 additional outlets. These additional outlets were identified through information shared by online searches, information from other Hong Kong NGOs and by Yellow Pages online, to include outlets that fit the following criteria—outlets selling antiques, décor/furniture, gold/jewellery, handicrafts, souvenirs and miscellaneous items (typically outlets selling a mix of items, e.g. plastic houseware and cabinets that includes ivory inlets) (criteria established in Nguyen *et al.* 2018).

Surveys focused on outlets in two districts in Hong Kong: Central and Western district and the Yau Tsim Mong district,

consistent with locations where ivory had been found in previous surveys (Lau *et al.*, 2017). However, a small number of ivory-selling outlets outside of these districts were also examined in this survey. Within the Central and Western districts, survey effort was focused on the high concentration of art and antique outlets along Hollywood Road and adjoining streets, as well as souvenir, handicraft and furniture outlets in Sheung Wan. In Yau Tsim Mong district, jewellery, as well as souvenir outlets and markets were surveyed.

All observations have been shared with the Hong Kong CITES Management Authority.

3.1.1 SURVEY TECHNIQUE

The survey was conducted by a survey team of Cantonese speakers. A covert survey method was used with an appropriate cover story adopted by the survey team members. Notes and photos were taken of ivory products for sale wherever possible.

Only elephant ivory items were counted, while outlets where non-elephant ivory was displayed for sale (such as mammoth ivory, narwhal ivory and hippo teeth) were noted, but items not individually counted. Vendors were queried about several aspects of the ivory trade and market—the price of items, the origin of items, awareness of illegality (purchase, possession, re-export), business prospect (ivory

stocks). The display of a possession licence issued by AFCD was also noted.

Ivory items that were openly displayed or brought out from a concealed area were counted. Prices were recorded if displayed or enquired from the vendor. The first price offered by the vendor was recorded, unless a lower price was voluntarily offered by the vendor, which is taken as the final price of the product. Although it was not possible to collect prices for all items displayed, a minimum of 10% of items were sought for prices. All prices are recorded in HKD and converted to USD in this report to aid comparison. The conversion rate used was HKD7.84 = USD1.

3.2 ONLINE MARKET SURVEYS

3.2.1 PLATFORMS

No published reports have comprehensively assessed the prevalence of Hong Kong's online trade in ivory, hence the set of surveys described here are important insights to understanding online ivory availability linked to Hong Kong. A total of 19 platforms, which includes 14 e-commerce and classifieds websites, four discussion forums and one social media platform, were identified as potential places where consumers in Hong Kong could seek to buy and sell ivory. These include both local and international platforms, with web addresses ending in either .hk or .com. Survey platforms of interest were determined based on their popularity and usage in Hong Kong (Kemp, 2020), and reports of wildlife trade of the platform in other countries/territories. Names of the platforms have been redacted for publication to avoid publicising the websites where ivory products can be found to potential traders/consumers.

A pilot study was conducted to assess whether it was possible to distinguish ivory offered for sale from Hong Kong

with ones from other locations, especially on international platforms. The pilot study was conducted in November 2018 and examined three platforms. Findings show that a number of platforms encourage users to include information about their location, which presumably helps consumers from identifying sellers in convenient locations. Other platforms, especially social media and discussion forums, allow groups to be formed based around particular areas of interest, locality, or both, which can help indicate users from Hong Kong. Language alone, however, could not be used to distinguish Hong Kong platform users. Posts/adverts written in traditional Chinese (i.e. complex characters, as opposed to simplified characters in use by mainland Chinese script) does help to distinguish users from outside of mainland China, but it is nevertheless widely used across countries/territories beyond Hong Kong, such as Macau SAR, Taiwan, Malaysia and Singapore.

3.2.2 SURVEY EFFORT AND PERIOD

Online platforms were examined and surveyed over one year from November 2018 to October 2019, but during three distinct periods—November and December 2018 (three platforms), February and May 2019 (11 platforms), July and October 2019 (5 platforms). Each of the 19 platforms were surveyed once to assess whether ivory was available on the platform in the previous 3 months (see 3.2.3 Survey techniques). Of these, three platforms were found to have more than a nominal amount of ivory posts/adverts, and were subsequently selected for repeat surveys six months

(platform 1) and three months (platforms 2 and 3) later, in order to assess within the project period the consistency and frequency of ivory posts/adverts over two to three time periods (Table 2). The difference in time spans is merely due to the time period that the platforms were first surveyed, i.e. platform 1 in December 2018, platform 2 in February 2019. A total of 41 working days, 8 hours per day (including time spent on data entry), were used to examine the 20 platforms, and to conduct repeated surveys of three platforms.

TABLE 2

Schedule for repeated surveys of three platforms online, Nov 2018–Oct 2019

	SURVEY PERIOD	SURVEY COVERAGE
Platform 1	Mar 2019, Jul–Aug 2019	Jan–Mar 2019, Jun–Aug 2019
Platform 2	Nov–Dec 2018, July 2019	Sep–Dec 2018, Apr–Jun 2019
Platform 3	Nov 2018, Mar 2019, Oct 2019	Posts are not dated

3.2.3 SURVEY TECHNIQUES

For each platform, a lookback date of 3 months was applied, so that only posts/adverts dated in the past 3 months from the survey date were counted. This was to capture posts/adverts that were still deemed, arbitrarily, to be “active”, i.e. still available for sale. However, it is highly possible that posts/adverts would have been taken down by the seller once items were sold, and that survey results would not be able to capture completely the full scale of ivory availability of the platforms surveyed.

In order to identify posts/adverts with ivory, 12 code words were typically plugged into the search function of the platforms, where such a function existed. The code words were either in Chinese, including variations of traditional and simplified Chinese; and English, with some code words a mix of both Chinese characters and English alphabet letters. Beyond such search results, some platforms are further

divisible by categories and groups—typically delineated based on interest, product categories, or geographic areas, e.g. carving antiques, groups for “Hong Kong”—which can be searched by manually scrolling through posts or advertisements. Platforms without a search function were also explored by looking in groups and product categories.

Data on the ivory type and quantity of items for sale were collected. Where possible, information about the seller (location, contact details) and price of the item (as displayed) were also recorded. Screenshots of posts/adverts were also captured. Sellers were not directly contacted by the surveyor; hence no attempt was made to corroborate the authenticity of the product, price information and item sale status with the seller. Profiles of frequent sellers were shared with the CITES Management Authority in Hong Kong.



RESULTS

4. RESULTS

4.1 OVERALL TRENDS IN HONG KONG'S PHYSICAL IVORY MARKET

There are two main components that were assessed to determine the scale of ivory availability in Hong Kong:

1. Number of outlets that continue to stock ivory
2. Quantity of ivory openly displayed for purchase

Other aspects of the ivory market also help to characterise the trade in Hong Kong and the degree of change amongst traders in the market. These include changes in price, presence of ivory alternatives, compliance with legal requirements, as well as trader perceptions and attitudes on business prospects and stock management.

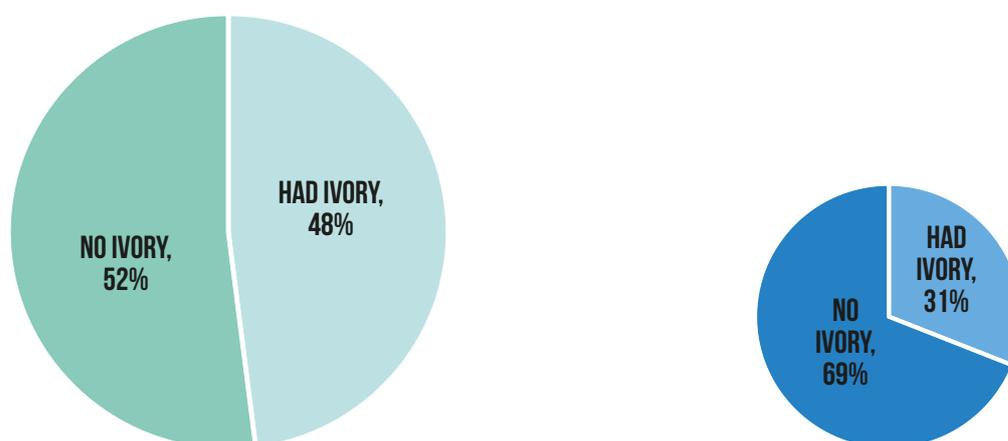
4.1.1 NUMBER OF OUTLETS

The current survey found 60 outlets with ivory out of a total 151 outlets visited. This survey examined outlets that were previously surveyed in 2015 (100 outlets) and made considerable effort to locate additional outlets that might

stock ivory products (51 outlets). As Figure 3 shows, 48% of the outlets from the 2015 survey were found to have ivory (including not for sale ivory items), while 31% of outlets had ivory from newly identified outlets.

FIGURE 3

Proportion of known outlets (from 2015 survey) (left) and new outlets (right) that had ivory available for sale in the 2019 market surveys



The types of outlets where ivory was found in 2019 were largely similar to the outlet types in the 2015 survey. Antique galleries (23 outlets) and specialty outlets (17 outlets) were the top two outlet types with ivory in both the 2015 and 2019 surveys. Gift shops and name seal outlets had the greatest decline in outlets with ivory, from a combined 24 outlets in 2015 to 10 outlets in 2019 (Table 3).

Of the outlets that were once operational in 2015 (100 outlets), 24 of these outlets were no longer open in 2019 (including 6 outlets that were closed on visit, or not visited). Most of these outlets that have now closed had fewer than 30 ivory items per outlet back in 2015, although two outlets had sizeable quantities of ivory products on display—over 100 ivory items and over 1,000 items, respectively.

TABLE 3

Number of outlets and ivory items displayed by outlet types, 2019 survey

OUTLET TYPE	OUTLETS (NO.)	OUTLETS (%)	ITEMS (NO.)	ITEMS (%)	ITEMS PER OUTLET (NO.)
Antique gallery	23	38%	1,010	3%	44
Gift shop	4	7%	123	0%	31
Hotel souvenir shop	1	2%	51	0%	51
Jewellery outlet	5	8%	12	0%	2
Mah-jong shop	2	3%	8	0%	4
Name seal outlet	6	10%	308	1%	51
Specialty shop	17	28%	37,652	96%	2,215
Teahouse	1	2%	9	0%	9
Temple	1	2%	2	0%	2
Total	60	100%	39,175	100%	653

4.1.2 QUANTITY OF IVORY DISPLAYED

There was a total of 39,197 ivory items found in the current 2019 survey. However, it should be acknowledged that in 19 (out of 60) outlets where ivory items were found, an exhaustive count of individual items could not be made, especially pertaining to six outlets where there were over 1,000 items (two of which were estimated to have over 10,000 items each). It was not possible for the survey team to count all of the items displayed while visiting the outlet, nor during reviews of photographic evidence after the survey, thus this estimate of total ivory quantities should be considered as a minimum and absolute totals looked upon with caution.

In contrast to the number of outlets found with ivory, which was more evenly distributed across different outlet types, the vast majority of ivory quantities were observed at specialty

outlets (96%; Table 3). Further evidence of this is shown in Table 4, where six specialty outlets had over 1,000 ivory items displayed in-store, which alone makes up 79% of the total quantity of ivory observed.

Antique galleries had the next highest quantity of ivory products (3% of total), followed by name seal outlets (1%). This suggests that for astute buyers specifically seeking out ivory items, specialty outlets possess a wide range and quantity of items available for purchase. Additionally, outlets that specialise in particular types of ivory products, such as antique ivory or name seals, continue to hold ivory stocks for consumers of these kinds of products. Comparatively fewer ivory items can be found in more generalist shops, such as gift, hotel souvenir and jewellery outlets, where ivory items are likely a minor portion of the shop's overall product range.

TABLE 4

Number of outlets in different ivory quantity categories, by outlet type, 2019 survey.

OUTLET TYPE	<10 ITEMS	10–100 ITEMS	100–1,000 ITEMS	>1,000 ITEMS
Antique gallery	14	7	2	
Gift shop	2	2		
Hotel souvenir shop		2		
Jewellery outlet	5			
Mah-jong shop	2			
Name seal outlet	1	4	1	
Specialty shop	1	4	9	6
Teahouse	1			
Temple	1			
Total	27	100%	39,175	100%

4.1.3 KNOWN OUTLETS: CHANGES OVER TIME

Changes in the market can be assessed more reliably if comparing between the same subset of outlets. This comparison is made using results from the 2015 survey (Lau *et al.*, 2017), and the current 2019 survey, where the same set of outlets were revisited.

CHANGES IN OUTLETS WITH IVORY

There were fewer outlets found with ivory in 2019 compared to the 2015 survey. In 2019, 48 outlets (out of 100 outlets³, from list of outlets surveyed in 2015) had ivory displayed (48%); while in 2015, 73 outlets (out of 131 outlets surveyed) had ivory (56%).

Of the outlets displaying ivory in 2019, five still displayed ivory items that, according to the trader, were no longer for sale. Ten of the outlets with ivory for sale in 2015 (that are still operating in 2019) no longer had ivory on display.

Several outlets had changed business (Table 5 – number of “quit” outlets) since the 2015 survey: 14 outlets (out of the 100 outlets resurveyed in 2019) no longer had the same business name and/or nature. Other outlets were clearly the same business, by name, but no longer stocked ivory (Table 5 – “no ivory displayed” outlets). Two outlets were said to have moved according to the current tenants—one into a private business in a commercial building, the other into an outlet in another location, both of them no longer stocking ivory.

None of the outlets surveyed in 2015 that did not have ivory displayed were found to have introduced ivory for sale in 2019. Meanwhile, two outlets that could not be surveyed in 2015 (Table 5 – “unvisited”, “closed on visit”) were found with ivory in 2019, holding a combined 46 items.

TABLE 5

Results of outlets surveyed in 2015 that were revisited in the 2019 survey

		2015 survey		
		OPERATING IVORY DISPLAYED, FOR SALE	NO IVORY DISPLAYED	NOT OPERATING NOT OPERATING
2019 survey	Operating			
	Ivory displayed, for sale	41	0	2
	Ivory displayed, not for sale	3	2	0
	No ivory displayed	10	16	2
	Not operating			
	Quit ivory business	6	3	5
	Unvisited/moved	3	1	3
	Closed on visit	2	0	1

CHANGE TO THE QUANTITIES OF IVORY DISPLAYED

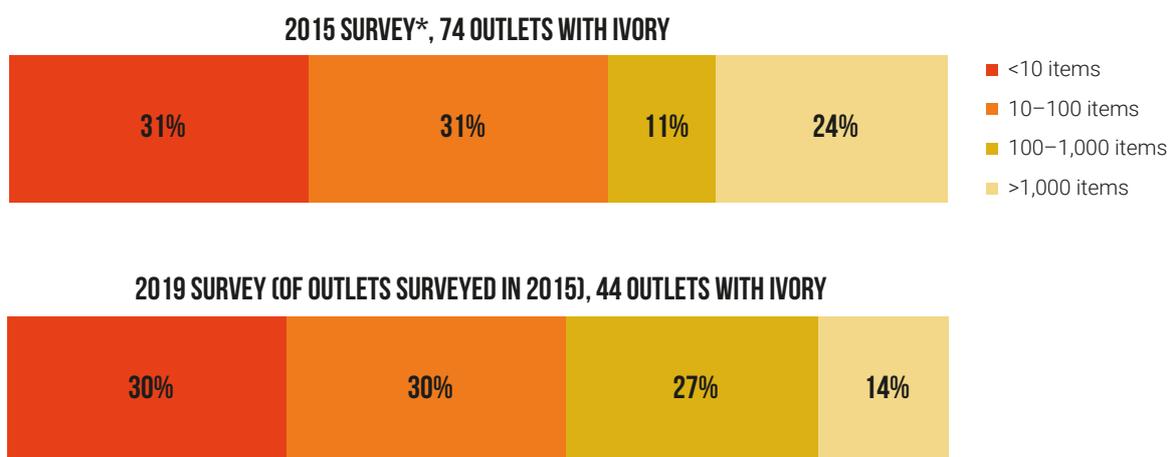
Comparisons between the quantity of ivory displayed across different survey efforts—particularly by different survey teams—may not be reliable as differing methodologies could have been applied. However, as the 2019 survey for the current report revisited the same list of outlets that were surveyed in 2015 (Lau *et al.*, 2017), comparisons using this subset of outlets alone can be reliably made.

As indicated in Figure 4, a key difference in the quantity of ivory during the two survey periods is the number of outlets found with over 100 ivory items. Outlets with quantities of 100–1,000 ivory items had increased from 11% in 2015 to 27% in 2019, however outlets with over 1,000 ivory items had concurrently decreased from 24% (2015) to 14% (2019). Together, this suggests that outlets with large quantities of ivory items were generally displaying fewer items.

³ Only 100 outlets of the 131 surveyed in 2015 were revisited in 2019.

FIGURE 4

Proportion of outlets by ivory quantity categories, comparison between surveys in 2015 (Lau et al., 2017) and 2019 (of outlets surveyed in 2015)



* There is an additional 3% of outlets with ivory where the number of items displayed could not be determined during the survey reported in Lau et al., 2017.

4.1.4 NEW OUTLETS

In addition to the 100 outlets from the 2015 sample of outlets that were resurveyed in 2019, another 51 additional outlets were surveyed. These outlets were selected for survey due to their fit within one of the outlet categories (see 3.1), though a large proportion was made up of antique (20 outlets) and jewellery (20 outlets) retailers. Nearly two thirds of these newly surveyed outlets (30 outlets, 65%) had no ivory items displayed, while 15 outlets had ivory for sale (33%), and four outlets had ivory displayed but not for sale.

These new outlets uncovered 120 displayed ivory items that were unaccounted for in previous surveys; 13 of the 15 new outlets had fewer than 10 items displayed, yielding an average of 8 items per new outlet. This was far lower by comparison to known outlets (that were surveyed in 2015) which had an estimated 888 items per outlet. This difference may be due to the lack of specialist ivory outlets amongst the new surveyed outlets.

4.1.5 OBSERVATIONS

One difference in the 2019 survey from previous observations was the inclusion of ivory products that are purely for display and not for sale. These traders explained that the forthcoming legal changes had led them to display these often eye-catching items but to withdraw them from sale, which may suggest that many ivory dealers are also collectors themselves. It is unclear whether the products can be discreetly made available for sale to the right buyer, though the survey team had made it explicit their intention

to buy when enquiring about ivory products within these outlets. There were nine outlets in total that had “not for sale” ivory items, with a total of 29 items on display. These included larger items such as intricately carved ivory boats and figurines, as well as smaller items such as bracelets and necklaces, bangles and name seals. It is likely that many more ivory items will no longer be intended for sale, despite being displayed, when the local ivory market closes at the end of 2021.



Some outlets include specific labels for mammoth ivory products. Credit: TRAFFIC.

4.1.6 MAMMOTH IVORY

Mammoth ivory products were by far the most common alternative to elephant ivory in the surveyed outlets. In 2019, 26 outlets, or 20% of outlets that were open for survey, had mammoth ivory. The same number of outlets (26) were found with mammoth ivory in the 2015 survey, though comprised 33% of outlets open for survey at the time.

Of outlets that had elephant ivory (60 outlets) in 2019, 28% (17 outlets) also stocked mammoth ivory. This meant there were nine outlets that had mammoth ivory without also stocking elephant ivory in 2019, which is an increase from four outlets in the 2015 survey.

There were no other wildlife substitutes to elephant ivory found on display.

4.1.7 WILLINGNESS TO PROMOTE ILLEGAL BEHAVIOUR

Traders were asked whether ivory purchased in-store could be taken out of Hong Kong, to assess their willingness to promote this illegal behaviour. When asked in 2015, pre-Convention ivory could still be taken out of Hong Kong if a re-export permit was applied for through AFCD. However, subsequent legal amendments rendered all re-exports of elephant ivory illegal by the time the 2019 surveys were conducted.

Results from the two surveys (Figure 4) show a slight uptick in the proportion of traders that confirmed ivory products cannot be taken out of Hong Kong, from 41% in 2015 to 45% in 2019. Despite this, there were still a large proportion of traders who suggested ivory could be taken out of Hong Kong, from 36% in 2015 to 32% in 2019 (which included one trader in 2019 who implied it would be legal to re-export ivory with a permit). Many of these traders recommended hiding small items in luggage or carrying them as pre-owned items (not purchased in Hong Kong). In spite of these suggestions,

several traders were quite candid about the ivory ban and restrictions on crossing the border with ivory, and possible imprisonment if caught. One trader suggested the buyer did not take the items themselves out of Hong Kong, given the risk, but they could arrange delivery from Hong Kong to Shenzhen, to allow the buyer to safely pick them up on the China side of the border.

There was also a higher proportion of traders that were evasive about this question, saying either that they didn't know or could not say whether it was possible or not—from 7% to 22%. Understandably, traders would not want to be implicated if a customer was caught with ivory purchased through them while crossing the border, although responses from some traders do suggest they are not entirely aware of the full scope of the amended law. One trader suggested ivory can still be worn as a personal accessory while crossing the border until the year 2021, even though ivory imports and re-exports were banned in 2018.

4.1.8 LICENCE AND POSTER DISPLAY

Display of a possession licence and AFCD poster are mandatory for all outlets trading in ivory for commercial purposes (AFCD, 2015). In 2015, a large proportion of outlets were found without licences clearly displayed. This was also the case in 2019, although a greater proportion of outlets with licences were found (57%), compared to only 39% of outlets displaying licences in 2015.

Posters had much lower uptake in outlets compared with licences. Only 30% of outlets had posters displayed in 2019. Even fewer outlets (20%) met both requirements for displays of licence and poster.

Adherence to this legal requirement of displaying licences was assessed against another law-abiding behaviour—correctly communicating whether ivory can be taken out of Hong Kong. 56% of outlets with licences were able to give the correct response that ivory products could not be taken out of Hong Kong, yet only 31% of those without licences displayed gave the same answer. This was similar to responses in 2015—59% of outlets with licences and 33% of outlets without licences gave the correct response.

Conversely, a large percentage of outlets were still suggesting that ivory could be taken out of Hong Kong in 2019, especially outlets without licences displayed (38%). A further 26% of outlets without licenses displayed could not, or chose not to, provide a definitive accurate answer.

This indicates an urgent need for AFCD to clarify to ivory traders the scope of the 2018 legal amendment that made it illegal to import and re-export ivory, and for the traders to communicate this clearly to potential buyers.



Posters supplied by AFCD to ivory traders **must be displayed on the premises**. Credit: TRAFFIC

TABLE 6

Comparing traders' willingness to promote illegal behaviour based on whether licences were displayed on the premises

	HAVE LICENCE (OR CLAIM TO HAVE)	NO LICENCE DISPLAYED OR UNKNOWN
Cannot take	19	8
Can take	8	10
Can take with permit	1	0
Cannot say/don't know	5	8
Didn't ask	1	0

4.1.9 PRICES

Price data were collected for a wide range of product categories, where given (Appendix 1). Due to the vast number of ivory items on display in some outlets (likely numbering over 10,000 items in a few cases), additional effort was placed on collecting price information for common, and typically machine-carved, jewellery items such as bangles, chopsticks, earrings and rings to enable comparison. As Table 6 shows, prices were, on average, similar in the current survey compared to surveys conducted in 2014–2015 (Martin and Vigne, 2015) for bangles, chopsticks and

rings. The slight increase in 2019 could be reflective of an inflationary rise in price. The value of name seals was considerably higher in 2019, more than double the average price in 2014–2015, an anomaly when compared to price trends amongst other ivory products. These relatively stable prices are consistent with findings in mainland China, where no significant change in price was found between 2017 and 2018, during which the ban on domestic ivory trade was imposed (Xiao, 2018).

TABLE 7

Comparison of average prices for common ivory products in Hong Kong between 2015 and 2019, in USD. Source: Martin and Vigne (2015; for 2014–2015 prices)

	SIZE (CM)	2014–2015 (USD)	2019 (USD)
Bangles	1–2.5	519	577.80
Chopsticks	20–22	308	315.25
Name seal	2x6	231	489.75
Ring	0.25	22	38.16

4.1.10 IMPACT OF BAN ON LIVELIHOODS



“Discount Day”, offering 15% for purchases of 2 items or more.

Credit: TRAFFIC.

Some traders have coped with the decline in demand for ivory products through diversification, through trade in precious stones, crystals, mammal skins (e.g. tigers, lions), as well as mammoth ivory, which is somewhat of a transferable skill that carvers could adapt to in-house. There are numerous other traders who appeared not to have invested in other types of products.

Traders were also broadly resigned to keeping their ivory stocks in “personal collections” after 2021, once the ban is in place. The industry is adopting different strategies to liquidating their stocks, including selling ivory at auctions, which is apparently a quick way of reducing their ivory stockpiles, and is an approach that is said to be encouraged by AFCD for traders. However, profits can be limited due to the higher fees associated with sales through an auction house, which has discouraged some traders from adopting this approach. Five outlets were observed to be offering discounts on their ivory items across the board, although it might be possible that more outlets may also offer discounts if item prices were specifically negotiated with the trader.

4.2 ONLINE SURVEYS

A total of 19 platforms were assessed for the presence of ivory items for sale, with six platforms found to have advertisements and posts for ivory products. As Table 8 shows, each of these platforms has varying numbers of ivory posts, as well as volume of items for sale. Platform 4 in particular had traders that were offering large volumes of ivory, primarily trinkets. However, all recorded ivory posts on this website were from 1–3 years prior to the survey date, which could indicate that these traders are no longer active on the site.

Only platforms 1, 2 and 3 had recent posts (in the previous 3 months) of ivory products when the platforms were first reviewed. These three platforms were subsequently surveyed 2–3 times within a period of one year (November 2018 to October 2019) to assess the frequency and volume of ivory-related posts.

TABLE 8

Initial scoping survey of online platforms relevant to Hong Kong sellers, no. of posts as at survey date

PLATFORM NO.	PLATFORM TYPE	SURVEY DATE	NO. OF IVORY POSTS
1	Secondhand trading	Mar 2019	80
2	Social media	Nov 2018	38
3	E-commerce	Nov 2018	7
4	Forum	Nov 2018	31
5	Forum	Sep 2019	13
6	Secondhand trading	Sep 2019	1
7	Secondhand trading	Mar 2019	0
8	E-commerce	Mar 2019	0
9	Classifieds	Mar 2019	0
10	Classifieds	Mar 2019	0
11	E-commerce	Mar 2019	0
12	E-commerce	Mar 2019	0
13	E-commerce	Mar 2019	0
14	Secondhand trading	Mar 2019	0
15	E-commerce	May 2019	0
16	E-commerce	May 2019	0
17	Forum	Sep 2019	0
18	Secondhand trading	Sep 2019	0
19	Forum	Oct 2019	0

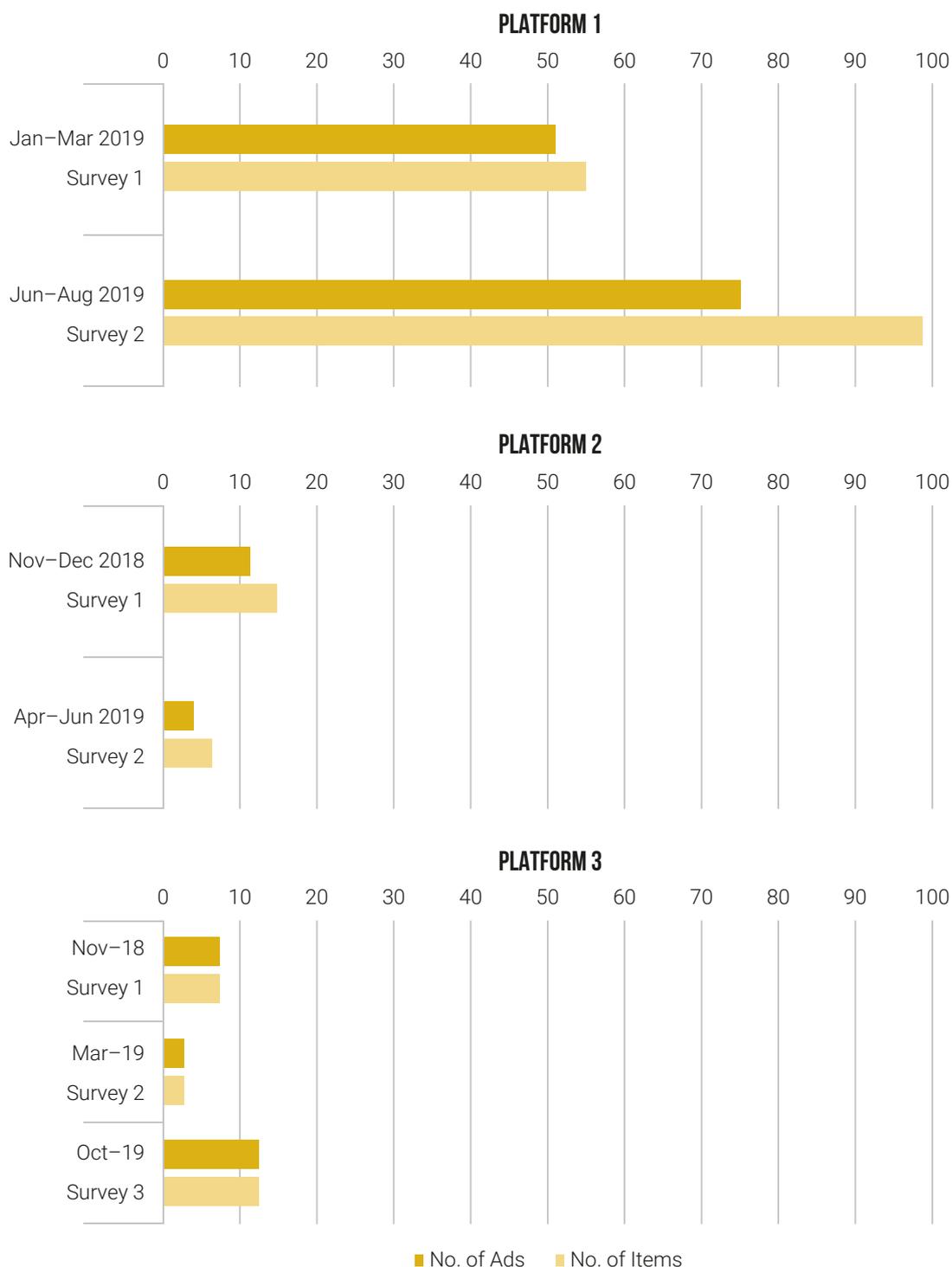
4.2.1 REPEATED SURVEYS

A total of 161 ivory advertisements were found during the 12-month period on the three platforms, with 196 items being offered for sale. Platform 1, a secondhand trading platform, had the most ivory advertisements (78%) and items (79%) in repeated surveys of the three platforms (Figure 5). Of the surveys of Platform 1, the latter survey had slightly

higher numbers of new ivory advertisements and items for sale than the initial survey, though ongoing periodic surveys would be needed to establish trends in future. Nevertheless, the considerably higher numbers of ivory on Platform 1 should garner greater attention by enforcement agencies and oversight by the website manager.

FIGURE 5

No. of ivory advertisements and items in repeated surveys of platforms 1, 2 and 3 during November 2018 and October 2019. Note that no dates on the advertisements were given on Platform 3, hence the month of survey is given in the advertisement period.



4.2.2 IVORY ITEMS FOR SALE

Figurines of a wide variety of statuettes, sizes and prices, were the most numerous type of ivory item being advertised (50 items). When grouped into categories, jewellery was the most common (46%), especially items such as amulets, beaded bracelets and necklaces, earrings and pendants. This was followed by figurines (30%) and household items (22%).

The jewellery category is much more dominant in the physical market, making up the majority of items found on display, compared to the somewhat lesser proportions in online trade. The difference lies in the tendency for physical outlets to fill up display shelves with stocks, so that much greater quantities of small trinket pieces can be displayed on a given shelf than larger pieces. For online channels, often it is one or a handful of items that are advertised together in a single post—the number of items are counted as shown in the advertisement, even though there may be numerous items of the same description in storage.

All products found on the surveyed platforms were finished products; no raw tusks or cut pieces were found. Popular household items sold in the physical market were also for sale online, including chopsticks (16 pairs) and name seals (7 pieces). Some of the more traditional items found in Chinese culture, and less prevalent in ivory markets outside of Hong Kong and mainland China, include ivory birdcages (and small fitted ivory figurines), Chinese traditional weight scales, and the Chinese layered (carved) puzzle ball.



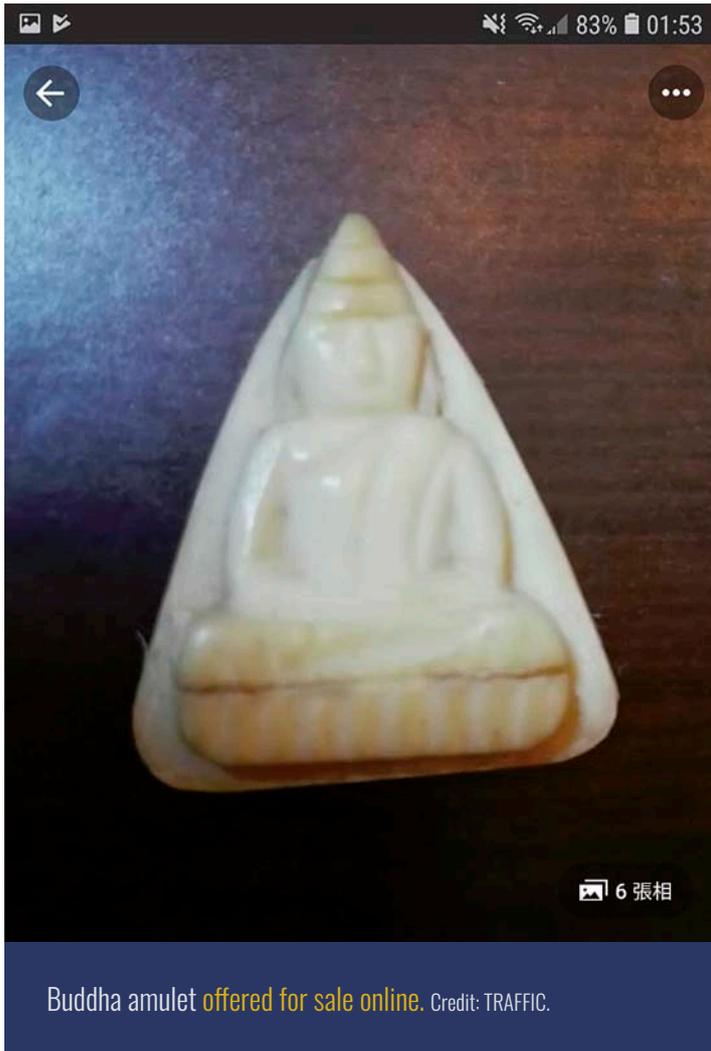
Jewellery items are some of the most popular ivory product offered for sale in Hong Kong outlets. Credit: TRAFFIC.

4.2.3 PRICES

Prices varied considerably, both between different products, and within items of the same product type (Appendix 2). The lowest price recorded was a pair of ivory earrings of 2.5 cm in length, being sold for HKD10 (USD1.28), while the most expensive item was an intricately-carved whole tusk (1.5 m, 6.5 kg) costing HKD5 million (~USD642,000). Curiously, prices differed widely for some generic products such as chopsticks, with a price range of HKD450–2,000 (USD58–257), beaded bracelets (HKD520–5,900, USD57–757) and bangles (HKD350–3,800, USD45–488).

The combined value of ivory items advertised online is HKD6,246,229⁴ (USD801,842), though this refers to a portion, 78%, of the online posts that had prices advertised. Price reductions were also seen amongst a few duplicate posts found during different survey periods. Around 13–50% reductions in price could be ascertained on Platform 1, where there was around a 6-month gap between survey periods. The biggest price shift was a carved ivory tusk, priced at HKD5 million (~USD642,000), which was discounted from HKD30 million (~USD3.85 million) six months earlier.

⁴ The discounted price of ivory items were used where the items were listed at a reduced price in subsequent survey periods.



4.2.4 IVORY SELLERS ONLINE

A total of 72 sellers were identified through ivory posts (“advertisements”) online. One seller had 18 posts of ivory products within the survey period, though multiple posts of ivory were the exception, as the majority of sellers (64%) had only a single ivory post. Few of these sellers were exclusively offering ivory for sale, but typically had other materials, such as precious stones, or antiques, for trade. One of the more notable groupings were sellers of Thai amulets, many of which include a small ivory-carved Buddha, said to be blessed by Thai monks.

Of sellers with multiple ivory posts (more than 3 posts), only two had specified physical outlet addresses. Furthermore, sellers did not appear to be cross-posting on the other surveyed platforms, at least not with the same username. Most sellers were recommending sales through face-to-face exchange, with a minority specifying post/courier delivery as the primary form of transfer. This could be a result of the peer-to-peer nature of the platforms surveyed and may indicate that most sellers are individuals or small businesses that are able to do personalised meet-ups with buyers.

4.3 COMPARISON BETWEEN PHYSICAL AND ONLINE MARKETS

4.3.1 PRICE

Prices recorded in the physical market tended to be higher, on average than ivory products sold in online markets, as well as having a wider price range. For example, chopsticks greater than 24 cm had an average price of HKD3,652.31 (USD469.92) in the physical market, compared to HKD702.50 (USD90.39) online. The highest prices for different product categories

in the physical market were approximately 5–30 times the upper range of prices in online markets, while lowest prices were comparatively similar, though slightly higher in physical markets. Higher prices in retail outlets could be because of the higher overhead costs in running a physical premise, while online sellers have fewer overhead costs.

TABLE 9

Comparison between prices of common ivory jewellery items in physical and online markets in Hong Kong

PRODUCT CATEGORY	MARKET	AVERAGE PRICE (HKD)	PRICE RANGE (HKD)	NO. OF PRICE POINTS
Ivory bangle	Physical	4,444.64	150–23,000	47
	Online	2,140.00	350–4,300	5
Ivory beads on string bracelet	Physical	7,503.89	267–28,800	9
	Online	1,906.44	480–5,900	9
Ivory beads on string necklace	Physical	5,840.87	900–10,500	23
	Online	1,936.67	200–3,800	12
Ivory chopsticks	Physical	2,542.93	150–9,800	41
	Online	655.00	450–2,000	9
Ivory earrings	Physical	814.35	12–13,000	23
	Online	311.75	10–380	12
Ivory name seal	Physical	3,964.75	250–21,800	40
	Online	365.33	250–750	6
Ivory pendant	Physical	2,766.25	68–28,000	52
	Online	598.00	80–1,500	10
Ivory rings	Physical	740.42	25–3,800	19
	Online	730.00	120–2,200	4

4.3.2 LOCATIONS

Online sellers hailed from a broad range of locations in Hong Kong (of those that included locational information) compared to physical market sellers, of which Kowloon and Hong Kong Island sellers were predominant. This is understandable as there are 383 registered licensees in

Hong Kong that could legally sell ivory (AFCD, 2020b), of which only ~60 sellers were identified in the current survey; not to mention the possibility of the illegal sale of ivory without a licence.

4.3.3 VOLUME AND RANGE OF ITEMS SOLD

The volume of ivory products that were found for sale in the online market pales by comparison to the physical market. The vast majority of online adverts identified had single items for sale, with two thirds of online sellers not found with more than one ivory-related post during the survey period. The top two online sellers had 17 and 16 posts of ivory products, with each post offering one item for sale (with only one exception). By contrast, six outlets in the physical markets

had one ivory in displayed stock, while 90% of the remaining outlets surveyed with ivory had more than one ivory item displayed. Meanwhile the variety of ivory products were similar across markets, with jewellery products dominant (e.g. beaded bracelets/necklace, figurines and pendants), while whole ivory tusks (polished and carved) were more readily found in the physical market than online.



DISCUSSION

5. DISCUSSION

This report sought to assess the aftermath of the Hong Kong Government's implementation of an ivory market phase-out plan, of which the first two phases of three have come into effect during May and August 2018. Market surveys carried out for this report provide a check on the progress of the phase-out plan and its impact on trade activities

domestically, as well as assessing the preparedness of the market for phase three's closure of the local ivory market. Major gaps and weaknesses arising from the market assessment are highlighted in the following discussion and must be addressed in order to deter ivory trafficking in the territory effectively.

5.1 DOMESTIC IVORY MARKET

5.1.1 PREVALENCE OF IVORY FOR SALE IN THE PHYSICAL, ONLINE AND AUCTIONS MARKETS

Surveys of the physical market in Hong Kong found 60 outlets that were offering ivory for sale, out of 150 outlets surveyed (as having potential for stocking ivory). A closer look at the outlets that were once found with ivory in 2015 (Lau *et al.*, 2017)—74 outlets—indicated that 22 of them had either closed down or were no longer displaying ivory for sale in 2019 (Table 5), suggesting a market in decline. There were also 15 outlets found with ivory that were not known in 2015, which signifies that there are still outlets that are untapped for surveys as sources of ivory products. Indeed, the 60 outlets found with ivory in 2019 are a fraction of the 383 premises that are licensed with AFCD as possessing ivory for commercial purposes (AFCD, 2020b), although a proportion of these premises act as storage areas for the owners and may not actually be intended for sale. Future surveys could benefit from more widespread efforts to identify new outlets based on the outlet categories as a survey criterion (see section 3.1).

Despite the apparent decline in the number of ivory outlets, a rough estimate of over 35,000 ivory items were observed as available for sale, and there are at least 51 tonnes of

commercial ivory that are registered with AFCD at the end of 2020 (AFCD, 2021). The amount of ivory stocks remaining in Hong Kong is staggering compared to availability in other major markets in Asia⁵, and considering that by the end of 2021, domestic ivory trade will have to cease. This ample supply contrasts with traders' perceptions of demand. Most traders describe a bleak outlook for the global ivory market, with one trader expressing that they are unlikely to see ivory trade becoming legal again within his lifetime. Businesses with an existing pool of clients have, however, pointed to a renewed vigour amongst some known customers looking to purchase ivory before the domestic ivory ban comes into place at the end of 2021.

There is also a sizeable market for ivory online. Surveys of three prominent platforms for Hong Kong sellers, repeated 2–3 times over a 12-month period, found 196 ivory items being offered for sale by 72 sellers. The ivory product range offered online mirror those of the physical market. Therefore, it is possible that online channels may be offsetting a lack of interest and bringing access to buyers that the physical markets are unable to achieve.

⁵ Prior to the 2018 ban, market surveys in 22 cities found a total of 2,307 ivory products (Zhao *et al.*, 2017), which compared to 2,812 ivory products in 23 cities around a year later (Xiao, 2018). Thailand, another major market for ivory products, had over 7,000 ivory items displayed for sale when surveyed in 2019 (TRAFFIC data).

5.1.2 TRADER RESPONSE TO THE BAN

Perhaps in anticipation of the cessation of ivory trade domestically, some traders have already adopted the practice of simply displaying ivory items in view of the wandering buyer, but labelled as not for sale. Whether this is a sign, or not, of things to come after the implementation of the domestic trade ban in 2021, this practice might nevertheless create the impression that the products could be made available for sale in a discreet manner if the right buyer and price is offered.

The efficacy of the ban therefore relies to a degree on the self-moderated compliance of these ex-ivory traders to refrain from selling these items and carrying out an unlawful act. The government cannot regulate this practice; commercial premises are essentially private property of the owner and displaying not-for-sale items do not constitute unfair trade practices (as defined under the Trade Description Ordinance, Cap. 362).

Continued monitoring of these outlets after the ban is in place would be critical to stymie any attempts to sell ivory illegally. It is equally important to ensure that ivory stocks that are

not antique are not laundered into the ivory antiques market, as it will be the only remaining legal avenue for ivory trade after 2021. Yet effective monitoring and audits, to ensure stock levels after the ban remain the same, could be severely challenged. This is because no records are kept for ivory that is classified as non-commercial, which includes ivory kept in personal possession. If this practice continues, then all current commercial ivory stocks that will be reclassified as non-commercial once the ban is in place will not be monitored. Attempts to track stock levels after the ban would be muddled by any mixing of existing ivory stocks in private possession (of which there is an innumerable amount), and newly re-classified stocks formally of commercial purpose.

The inability to trace any movements and exchange of ivory could provide unscrupulous opportunities to trade in ivory while potentially laundering new ivory, illegally imported, to sustain reported stock levels. Hence continued market monitoring is pivotal, especially during the years after the ban is in place, to impress upon ivory holders that the government is vigilant towards any attempts to trade illegally.

5.1.3 EVIDENCE AND POTENTIAL FOR ILLEGALITY

Some traders have adopted a harder communications stance towards refusing sales to non-residents who express an intention of taking the ivory item out of Hong Kong. Still, an alarmingly high proportion of traders (32%) continue to suggest concealing small ivory items to evade suspicion at the border, a figure not too dissimilar to the 2015 survey. Other traders have offered to deliver purchased items through a courier service across the border into mainland China for a fee and others mentioned covertly selling ivory without a licence. As the liability falls on the buyer of the ivory at border points, rather than the trader where the item was purchased from, many traders see little incentive actively to prevent sales to buyers intent on taking ivory out of Hong

Kong, despite the fact that re-exports of ivory had become illegal at the time of survey.

The legality of ivory products for sale online is sometimes claimed, though proof is seldom provided. This issue was highlighted previously as a major point of concern (Lau *et al.*, 2017). Unlike purchases from physical outlets, where traders must display licences and posters as signals of legal trade, there are no parallel requirements for online ivory posts. There is a greater onus therefore on the consumer to be aware about regulations associated with ivory to seek legality proof.

5.1.4 LAW ENFORCEMENT EFFECTIVENESS

There also appears to be an insufficient level of scrutiny in Hong Kong of online platforms that are offering ivory products for sale, especially when compared with mainland China websites. One indication of this is the use of code words in advertisements. In the mainland's more regulated online markets, sellers make use of a range of code words to denote ivory products, such as descriptive words like "white

plastic" or emojis, in order to avoid website censors (Zhao *et al.*, 2017). Amongst the 20 websites reviewed for the current survey of Hong Kong trade, most of the posts identified were uncovered through straightforward terms such as "ivory" (in Chinese), which could suggest there are few deterrents to, and surveillance of, ivory sellers on online platforms in the territory.

5.2 CROSS-BORDER ILLEGAL TRADE

The number of ivory seizure cases and the total quantity intercepted declined during the years 2014 to 2018. Meanwhile, large-scale shipments of illegal ivory (>500 kg) continued to be funnelled into Hong Kong during this period, including one of the largest seizures ever in 2017 of ~7,200 kg. Analyses of these seizure cases indicate that the majority of the intercepted ivory was being flown on flights into Hong Kong, compared to the relatively few seizures entering the territory as illegal exports, transits or transshipments. Whether this suggests the flow of illegal ivory is intended for sale in the domestic market, for redistribution out of Hong Kong, or simply being stockpiled in the territory cannot be determined. What is clear, however, is that the 2018 legislative amendment of Cap. 586 will soon put an end to trade in the domestic market for ivory in the territory (other than for antique ivory), thus upending the potential for laundering of illegally-sourced ivory into the legal market. Much more needs to be done in the other two areas to ensure these do not become channels for exploitation:

- Illegal cross-border trade—while the Hong Kong Government has made considerable progress in enforcement of borders to combat ivory trafficking, such as its joint taskforce with Customs and Police departments to collaborate on major enforcement operations, ivory seizure rates suggest enforcement effort must be sustained, and in some areas significantly boosted. In particular, analysis reveals much fewer ivory seizures along sea and land borders, which could imply a law enforcement effectiveness gap in these areas.

- Ivory stockpile management—currently AFCD maintains records of all pieces of ivory registered by traders for commercial trade. While the system is not without flaws, as it relies on self-reported data from traders, it nevertheless allows the department to have a baseline to compare with previous records, thereby identifying discrepancies and irregularities. With the imminent market closure and cessation of domestic ivory trade, all ivory pieces currently registered for commercial trade (51 tonnes at the end of 2020; AFCD 2021) will effectively become private possessions of the trader, and records of quantities held by individuals will not be kept by AFCD. This lack of ability to trace ivory movements, particularly changes in ownership or smuggling instances that have passed the borders could become a major risk for law enforcement authorities. Establishing a system that would enable privately-held ivory within Hong Kong to be traceable would therefore be critical, in line with recommendations in CITES Resolution 10.10 (CITES Res. Conf. 10.10, Rev. CoP18) and Decisions 18.182-185 currently in force for such a stockpile inventory to be maintained, and updated on an annual basis to the CITES Secretariat. This traceability mechanism would need to be in effect before the market closure at the end of 2021 to facilitate a smooth transition from commercial to privately-held stocks reclassification.



CONCLUSION

6. CONCLUSION

Since TRAFFIC had last reviewed Hong Kong's ivory market in 2015 (Lau *et al.*, 2017), the ivory trade had been subject to intense scrutiny, both within the territory and internationally (Bouillot, 2018; Gibson *et al.*, 2018; Wong, 2018; ADMCF, 2018). The persistent local trade linked to supply from poached ivory from Africa at a time of record declines in wild elephant populations led to vociferous calls to place the utmost limit on the trade. The Hong Kong Government responded to these calls with a slew of measures, chief of which was to undertake a legislative amendment to close the ivory market in the territory (Environment Bureau, 2017). The impact of this on the market is best reflected in the direct refusal to offer ivory for sale to tourists intending to take ivory out of Hong Kong, a ban (on import and re-exports) that has been in place since August 2018.

The current report found the tendency of ivory traders to repudiate a potential sale was slightly higher than 2015 levels. Accompanying changes, including an increase in the maximum penalties for wildlife trade crimes, and distinction of summary and (the more serious) indictable offences in the legislation, has resulted in many more wildlife cases being heard in the District Court, where a stronger prosecution case and sentencing often result (e.g. Lau, 2018; Chiu, 2018; Chan 2019; Ryall, 2019; Mok, 2020). The more stringent sentencing would also be applicable to any future cases of ivory seizures.

These cumulative actions have led to incremental progress in restricting and governing the Hong Kong ivory market.

Despite these achievements, Hong Kong remains a critical location in global efforts to disrupt ivory trafficking. The CITES ETIS report for the 18th CITES Conference of Parties in Geneva in 2019 recognises Hong Kong's progress through actions in meeting targets under the National Ivory Action Plans, downgrading the territory from a Category A to B (from being "most affected" by illegal trade in ivory, to "markedly affected"). Yet seizure records continue to situate Hong Kong amongst one of the more frequent transit locations for the flow of illegal ivory to Asia, including recent large-scale seizures in 2017 (~7,200 kg; TRAFFIC, 2017) and 2019 (~2,100 kg; C&ED, 2019) that are indicative of organised criminal involvement. Given the effort to tackle the issue to date, the challenge remains for Hong Kong to pursue the most effective methods to fortify its territory from ivory trafficking further, and thus make a discernible contribution to ending elephant poaching.

Along with the changes in regulations, law enforcement effort and in the judiciary, a more aggressive approach is needed to tackle ivory trafficking at its roots—including follow-the-money investigations to uproot the organised syndicates that continue to use Hong Kong as a port of entry and transit in the illicit ivory trade. Moreover, to ensure the market phase-out plan delivers on the promise of a cessation of trade in all but antique ivory (and other exclusions such as trade for scientific purposes) in Hong Kong, the government must have a functioning monitoring system in place for managing non-commercial ivory (stockpile records, monitoring regime) prior to the market closure coming to effect.

RECOMMENDATIONS



7. RECOMMENDATIONS

STRENGTHEN INTERNATIONAL CO-OPERATION AND INTELLIGENCE SHARING

The success of co-operative law enforcement operations, ranging from the success of Operation Cobra III in 2015 to co-ordinated enforcement action between Hong Kong and mainland China's Customs departments that dismantled a cross-border smuggling syndicate, including its mastermind, in 2018 (C&ED, 2018), highlight the value of collaboration between law enforcement agencies across countries and territories for disrupting criminal networks. Enhancing co-operation, especially for intelligence sharing, beyond these operation "events" could be extremely beneficial and could help bolster the frequency and quality of risk profiling, which is the basis for much of the law enforcement actions carried out by Hong Kong Customs and Excise Department (C&ED). Currently INTERPOL's eco-message platform is used by Hong Kong authorities to share information with law enforcement counterparts in other countries/territories, in addition to any direct communication by phone/email between trusted individual and agency contacts. Advocating internationally for more decentralised and instantaneous intelligence sharing, such as establishing a region-based TWIX system in Asia, should be a key ambition for Hong Kong's C&ED in improving its capacity—for ad-hoc cases or major enforcement operations—to broaden their network of trusted law enforcement collaborators in addressing transnational ivory trafficking.

IMPROVE THE MECHANISM FOR DETERMINING IVORY ANTIQUITY, AND MAINTAIN OVERSIGHT OF THE ANTIQUE IVORY TRADE POST-BAN

While criteria for determining the antiquity of ivory pieces has been outlined, i.e. via documents that attest to the history of the item and/or expert appraisals (AFCD, 2018b), AFCD could benefit from further refining the criteria and improving rigor through engaging with businesses that deal in antiquities, such as auction houses and museums. These businesses often have in-house skills in authenticating antiquities and may offer valuable guidance formulating processes and identifying tools for authenticating antique ivory.

After 2021, the ivory antiques trade in Hong Kong will not be regulated with the current licensing system for pre- and

post-Convention ivory (as defined by Hong Kong authorities). Possession licences that are currently required to be displayed in view of customers provide a mark of legal tender. Allowing trade in antique ivory without requiring such licences removes this legality check. Importantly, possession licences and the current regime of recording and submitting transaction information enables government authorities to trace ivory trade movements, whether bought and sold domestically or traded overseas. Such records are critical for monitoring the flow of trade, and identifying possible contraventions, including the laundering of illegal ivory into the legal trade. One of the main ambitions of the law amendment (to Cap. 586) was to remove the potential for unscrupulous activities such as these. Setting essentially a lower requirement for antique ivory trade threatens to upend the legal antique trade system into a laundering loophole, as the temptation may exist amongst ivory holders to take advantage of this legal trade avenue to salvage a profit margin from ivory classified as illegal after December 31, 2021.

It is therefore suggested that AFCD reinstate the possession licence system for the trade in ivory antiques, and consider whether the trade could be more efficiently enforced if individual product labelling (with indelible marking) and other traceability measures should be introduced, e.g. using blockchain technology to track and embed the exchange of antique ivory within a traceable ledger. It is also recommended that the process of registering and licensing antique ivory traders should be initiated prior to the 2021 domestic trade ban coming into effect on December 31, so that a stock-take of antique ivory available for commercial trade can be assessed.

However, if the process of reinstating possession licences for ivory antique traders is too onerous due to the need to amend existing Hong Kong legislation, commercial stocks of antique ivory should at least be checked, through tallying of records and physical inspections, on a quarterly basis from 2021 onwards.

REGISTRATION OF IVORY STOCKS IN PRIVATE POSSESSION

The impending prohibition to trade ivory further in Hong Kong could encourage sellers and buyers to turn to the black market, and this may be exacerbated by the sheer number of ivory items that will be converted to private collections at the end of 2021. The 51 tonnes of registered commercial ivory in Hong Kong at the end of 2020 represent

⁶ Trade in Wildlife Information eXchange (TWIX), i.e. in the European Union (<https://www.eu-twix.org/>), Central Africa (<https://www.africa-twix.org/>) and the Southern African Development Community (<https://www.sadc-twix.org/>)

a substantial monetary loss to traders if stocks remain unsold, and it is quite possible that unscrupulous traders could turn to illegal means to recuperate such losses. It is critical that the Hong Kong Government, led by AFCD, take stern measures to stymie opportunities for illegal trade. This could be achieved through the continued tracking of ivory stocks within the territory, through a process of registering all commercial and privately held stocks. While this is a considerable undertaking, precedence in other countries suggest widespread ivory registration and record-keeping is possible. Notably, Thailand's nationwide registration of private and commercial ivory stocks was completed within a 90-day period in 2015, resulting in more than 40,000 people registering 670,984 ivory items (Krishnasamy *et al.*, 2016). This effort was paired with the installation of registration centres throughout the country, extensive publicity regarding changes in legislation and law enforcement operations to identify sales of unregistered stocks.

The current legislation (Cap. 586) does not include this provision to enable registration of privately-held ivory stocks, and would require an amendment to the law to enable this to happen. In the absence of an immediate change in policy, the Hong Kong Government should formulate an effective law enforcement strategy that facilitates the tracking of ivory stocks that have been classified for commercial trade prior to the 2021 ban coming into effect. This should include increased targeted and risk-based surveillance, as well as routine inspections of commercial stocks at least twice within 2021 prior to the ban, and once annually thereafter of the same stocks to guard against any wholesale ivory movements.

BETTER ENFORCEMENT OF LICENSED TRADERS IN PHYSICAL AND ONLINE MARKETS

The online market for ivory is not as well enforced as the physical market, due to the plethora of platforms and the anonymity that is permitted online. The lack of a clear locational information about a seller can render it difficult to govern. Although requirements for possession licences, as prescribed in Cap. 586, would apply to online ivory sellers, they are not required to display these licences, unlike in physical locations where licences must be displayed in a prominent manner. Hence, a different set of rules for the sale of ivory online is warranted. AFCD should therefore recommend licence holders to provide proof of legality by including images of their licence and product hologram labels in online advertisements, where the intention is commercial trade. While the legal requirement for licence display is intended for physical locations (the premise where the ivory is stored) and not for online platforms, it would nevertheless be useful

to establish precautionary standards for online commerce. This should facilitate online inspections, as AFCD will have on record details of the ivory stocks associated with a licence-holder, and can more easily check for and identify fraudulent behaviour.

Given the vastness of the online environment, it is crucial that the government collaborates with internet companies and NGOs in identifying instances of illegal trade, and places sufficient resources in carrying out investigations on suspicious posts, and the monitoring of online activities overall.

In the physical market, more than half of the surveyed outlets (57%) were found with displayed licences, along with 30% of outlets with AFCD provided posters. Although this was an improvement from the proportions found with licences and posters displayed in 2015, there is still some way to go to achieve full compliance, especially as the display of both licences and posters is a mandatory requirement.

Furthermore, it has been recommended previously (Lau *et al.*, 2017) that the requirement for licensees should be amended such that the submission of transaction records are done on a monthly basis, while ivory stock levels should be updated more regularly than the current five year intervals (previously only at licence renewal). Between 2019 and 2020, for example, registered ivory reduced by around 12 tonnes (AFCD, 2020b, 2021). This sizeable reduction in overall quantity of registered stocks, whether sold off or otherwise disposed, could have occurred anytime during the 5-year licence period, making it difficult if not impossible to track registered ivory movements, nor to take law enforcement action in case of illegal trading. AFCD could make better use of data submissions not only to track trade activities, but to respond to irregularities in a timely manner. This is especially pertinent in 2021, at the end of which a considerable proportion of the 51 tonnes of registered ivory can no longer be traded (AFCD, 2021).

IMPROVING DETECTION CAPACITY AT MAJOR PORTS OF ENTRY AND EXIT WITH FEWER PAST SEIZURES

C&ED should maintain continued monitoring of known air trafficking routes from Africa, and a greater focus on ivory trafficking along sea routes leading to Hong Kong will be critical for keeping in step with the changing modus operandi of ivory smugglers. Developing better intelligence and detection protocol will also be essential in uncovering ivory smuggling activities exported to the mainland, given the large volumes of trade and multiplicity of channels used to carry and deliver goods across the border.

STRENGTHENING POWERS TO INVESTIGATE AND PROSECUTE WILDLIFE OFFENCES THROUGH OSCO

Despite the reclassification of offences involving CITES-listed wildlife as either summary, or the more serious, indictable offences under the 2018 amendment to Cap. 586, the legislation comes up short in triggering investigations of criminal organisations behind the crime. Targeting the proceeds of the crime and making use of “follow-the-money” approaches, can be an effective means to identify the organised network behind wildlife smuggling. Legal experts and studies of wildlife crime in Hong Kong (Whitfort *et al.*, in prep.; ADMCF, 2018) have therefore pointed to the need for wildlife offences under Cap. 586 to be included in Schedule 1 of the Organised and Serious Crime Ordinance (OSCO, Cap. 455). This would enable enhanced investigative powers under OSCO for authorities to trace the financial beneficiaries of wildlife trafficking, and thus to pursue and prosecute those behind illegal wildlife trade for money laundering offences. Support from Hong Kong’s Security Bureau would be essential to facilitate the passage of a legal amendment to OSCO in the Legislative Council.

MULTI-SECTORAL STRATEGY FOR TACKLING WILDLIFE TRAFFICKING

Understanding amongst private sector businesses of their role, and possible complicity, in illegal wildlife trade has gained considerable momentum in recent years, and commitments to address the issue jointly have been established with initiatives such as United for Wildlife’s Financial Taskforce and

Transport Taskforce, as well as the Coalition to End Wildlife Trafficking Online (involving the world’s leading internet companies), are exemplars of this trend. Key Hong Kong Government agencies, led by AFCD, could take advantage of this private sector enthusiasm to foster a vision and pathway forward for the territory, driving a co-ordinated approach across government departments and the private sector towards ending illegal wildlife trade, through the development of joint strategies and compliance-driven actions.

This approach and leadership from the government are not new, but has been achieved before with the establishment of the Biodiversity Strategy and Action Plan in 2016 – an encompassing and multifaceted approach to setting joint objectives and targets for conserving biodiversity within the territory (Environment Bureau, 2016). A similar endeavour is needed for tackling illegal wildlife trade, but one which clearly recognises the need for multi-stakeholder involvement and actions. One key element of this work for the government is to build up the capability of other sectors to recognise and report on suspicious wildlife shipments (i.e. at airports, cargo terminals, including the roles of couriers and freight forwarders) and money flows that could amount to money laundering (i.e. with the Joint Financial Intelligence Unit and other financial institutions). Another useful starting point is to build on existing multi-stakeholder entities, such as NGO involvement in Hong Kong’s Wildlife Crime Task Force, and the industry representation within Hong Kong’s Endangered Species Advisory Committee, and encourage more joint, proactive actions to combat and prevent illegal wildlife trade, while instilling greater ownership of roles and responsibility by different stakeholders.

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ANNEXES

APPENDIX 1

Prices (HKD) of ivory products found in surveys of Hong Kong's physical markets

ITEM	SIZE (CM)	AVERAGE PRICE (HKD)	PRICE RANGE (HKD)	NO. OF PRICE POINTS
JEWELLERY				
Bangle	0.25-0.5	766.36	150-1,600	11
	0.6-1	2,997.78	280-6,000	9
	1-3	6,425.48	1,000-23,000	27
Beads on string bracelet		7,503.89	267-28,800	9
Beads on string necklace		5,840.87	900-10,500	23
Chopsticks	<21	1,730.00	150-3,000	16
	21-24	2,425.00	880-4,980	12
	>24	3,652.31	1,000-9,800	13
Earrings		814.35	12-13,000	23
Name seal	4x1	400.00	400.00	3
	6x2	3,767.30	250-21,800	37
Pendant		2,766.25	68-28,000	52
Rings	0.25-0.5	293.57	25-680	7
	>0.5	1,001.08	50-3,800	12
FIGURINE/FIGURE				
Figurine		9,000.00	6,000-12,000	2
	<10	18,385.71	800-100,000	7
	10-30	143,714.29	16,000-380,000	7
	30-60	54,000.00	12,000-80,000	3
	>60	820,000.00	820,000	1
TUSK				
Tusk – carved		201,416.67	2,500-450,000	6
Tusk – polished		53,500.00	8,000-130,000	6
Tusk – polished pair		600,000.00	190,000-1,500,000	3
Tusk – raw		65,000.00	60,000-70,000	2
HOUSEHOLD GOODS				
Accessory		800.00	800	1
Cigarette holder		6,750.00	5,500-8,000	2
Container		41,500.00	6,500-100,000	3
Container (toothpick)		1,000.00	1000	1
Earpicks		104.75	75-168	4
Lantern pagoda		450,000.00	450,000	1
Letter opener		1,800.00	1,800	1
Pen holder		68,000.00	68,000	1
Snuff bottle		1,850.00	1,200-2,500	2
Utensil set		28,000.00	28,000	1
Vase		215,000.00	215,000	2
TOTAL		24,407.05	12-1,500,000	311

APPENDIX 2

Quantity and prices (HKD) of ivory products found in surveys of Hong Kong's online markets

ITEM	SIZE (CM)	QUANTITY	AV. PRICE (HKD)	QUANTITY (WITH PRICE)	PRICE RANGE (HKD)
JEWELLERY					
Amulet		14	730.20	10	368-4,500
Bangle		5	1,650.00	4	350-3,800
Bracelet, bead	1cm-2cm	1	980.00	1	980
Bracelet, bead		10	1,862.00	9	520-5,900
Bracelet		7	891.43	7	180-3,900
Brooch		3	765.00	2	380-1,150
Earrings	1cm	13	293.15	13	10-960
Keyring		3	576.67	3	150-1,000
Necklace, bead		11	1,740.00	11	200-4,500
Necklace		8	2,482.50	8	60-8,800
Pendant, medium	3-4cm	2	790.00	2	80-1,500
Pendant, large	4-6cm	1	200.00	1	200
Pendant		8	373.33	3	120-680
Ring		4	873.33	3	120-2,200
FIGURINE/FIGURE					
Figurine	5-10 cm	3	2,500.00	3	1,200-4,800
	10-20 cm	3	6,100.00	3	2,500-8,000
	>20cm	1	138,000.00	1	138,000
Figurine		50	8,784.64	28	250-13,800
Layered ball		2	8,888.00	1	8,888
TUSK					
Carved		1	5,000,000.00	1	5,000,000
Plain polished		1	420,000.00	1	420,000
HOUSEHOLD GOODS					
Chopsticks	~20cm	16	930.00	15	450-2,000
Name seal	~6x2cm	7	353.14	7	162-750
Cup		1	1,000.00	1	1,000
Miscellaneous items		18	20,045.20	15	60-128,000

TRAFFIC is a leading non-governmental organisation working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

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