



*"Embracing Innovation to Conserve the World's Animal Kingdom."*

**Ivory Consultation  
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### **The United Kingdom Ivory Consultation**

The Department for Environment Food and Rural Affairs (DEFRA) response to the recent ivory consultation is welcomed - *"Banning UK sales of ivory - Summary of responses and government response<sup>[1]</sup>"*, dated April 2018.

However, I am still unclear if DEFRA's response encompasses the banning of elephant hunting trophy importation (ie. tusks/ivory) into the United Kingdom, where an elephant hunting trophy clearly falls within the definition of ivory obtained by commercial means – elephant hunting trophies and the tusks (ivory) are obtained in exchange for payment and *"buying"* the 'right' (sic) to kill an elephant.

DEFRA's response<sup>[1]</sup> clearly states that any commercial trade in ivory potentially falls within the remit of the government's proposed policy implementation, as stated at DEFRA's statement<sup>[1]</sup>, *"Part 2: Policy Statement:"*

*".....We intend the UK's ivory sales ban to be amongst the toughest in the world, demonstrating that the UK does not consider commercial trade in any ivory that could fuel poaching to be acceptable.*

*By commercial activities, we mean:*

- (a) buying, selling or hiring ivory*
- (b) offering or arranging to buy, sell or hire ivory*
- (c) keeping ivory for sale or hire;*
- (d) exporting ivory from the United Kingdom for sale or hire;*
- (e) importing ivory into the United Kingdom for sale or hire."*



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If elephant hunting trophies are still to be allowed for importation into (and 'personal' exportation out of) the United Kingdom, then please explain:

1. Why ivory obtained via payment for hunting an elephant is not a commercial transaction;
2. Where is the proof that ivory obtained via payment for killing an elephant and obtaining a hunting trophy (including the ivory tusks) is not being used internationally as a mask for ivory trafficking, thus fuelling ivory demand and thus perpetuating/stimulating elephant poaching?
3. If the government is to continue to be allow the importation of ivory into the United Kingdom under the guise of a 'legally obtained hunting trophy,' how will DEFRA/the government ensure that such tusks/ivory are not sold-on (illicitly, via dark markets etc.) in contravention of proposed policy? Once a hunting trophy's tusks are in the United Kingdom, how will these tusks be regularly tracked/checked and this 'method' not allowed to become a 'legal' loop-hole to obtain and traffick ivory?

To reiterate, from IWB's submission<sup>[2]</sup> to the consultation process:

1. Where is the evidence (not the theory) that the killing of an estimated 81,572 African elephants<sup>[3]</sup> as hunting trophies between 2001 – 2015 helped conserve the species?
2. If ivory worship within United Kingdom borders and all trade in ivory further restricted, then the loop-hole of ivory imports into the United Kingdom under the disguise of 'legally' obtained purchases of 'hunting trophies' and 'personal' items also needs to be addressed/eradicated. Trophy hunting does not help the elephant species<sup>[4],[5],[6],[7]</sup>.

In the past, the 'pseudo-hunting' of rhino<sup>[8],[9],[10],[11]</sup> has been used as a mask to 'legally' obtain rhino horn and transit the horn into Asia - then the trophy/rhino horn is absorbed without trace (due to the lack of law enforcement) into illicit supply routes.

In a May 2016, United Nations Office on Drugs and Crime (UNODC), *"World Wildlife Crime Report – Trafficking in protected species<sup>[8]</sup>"* (*"Case Study: Rhino Horn"* page 70 – 71), identified that the CITES exceptions made for the live transport of rhino and trophy hunting from South Africa, has given rise to Vietnamese *"pseudo-hunting"* (at around 50% of the trophy hunting market) as a 'legal' means of 'wildlife utilisation' to meet illicit demand for rhino horn. Even



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with a South African government ban of hunting permits being issued to Vietnamese nationals in 2012, the practice continued via proxy<sup>[8],[9],[10],[11]</sup>, with Vietnamese 'employing' Czech and Thai nationals as "*pseudo-hunters*" to kill in the name of 'wildlife utilisation' on the Vietnamese traders' behalf. There have also been 'illegal' rhino hunts orchestrated in South Africa directly from the United States<sup>[8],[12]</sup>. Even today, no one can say if any given rhino trophy hunt (and the long-term 'utilisation' of the rhino horn so obtained) is a pseudo mask, or not – once a given trophy's horn's micro-chip and identification marks have been removed, how can this horn be tracked 100% and who is tasked (resourced and motivated) to follow-up and monitor such trophies once in a country such a Vietnam?

What makes anyone think elephants are not, or will not be 'legally' "*pseudo-hunted*" to obtain ivory, especially when ivory stockpiles within China/Laos etc. begin to dwindle?

There is clearly an imperative to optimise the wild elephant population, providing the opportunity for the population to grow and recover. At the moment, the loss of elephant numbers makes population stability (let alone growth) impossible<sup>[13]</sup>. In order to 'save the elephant' all forms of elephant killing need to be eradicated – be that poaching, human wildlife conflict (including habitat loss) and the killing of elephants for pleasure in the name 'sport' (sic). Allowing this latter 'sports killing' of elephants (and many other species for that matter) to somehow be excused as something more meaningful than human vanity and self-gratification, with the potential of being a pseudo mask to obtain ivory (and other wildlife commodities) is a delusion that needs to end.

Yours sincerely,

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