

FROM TUSK TO TRINKET

Persistent illegal ivory markets
in Viet Nam

Minh D. T. Nguyen, Rosa A. Indenbaum, and Madelon Willemsen





TRAFFIC REPORT

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FROM TUSK TO TRINKET: Persistent illegal ivory markets in Viet Nam

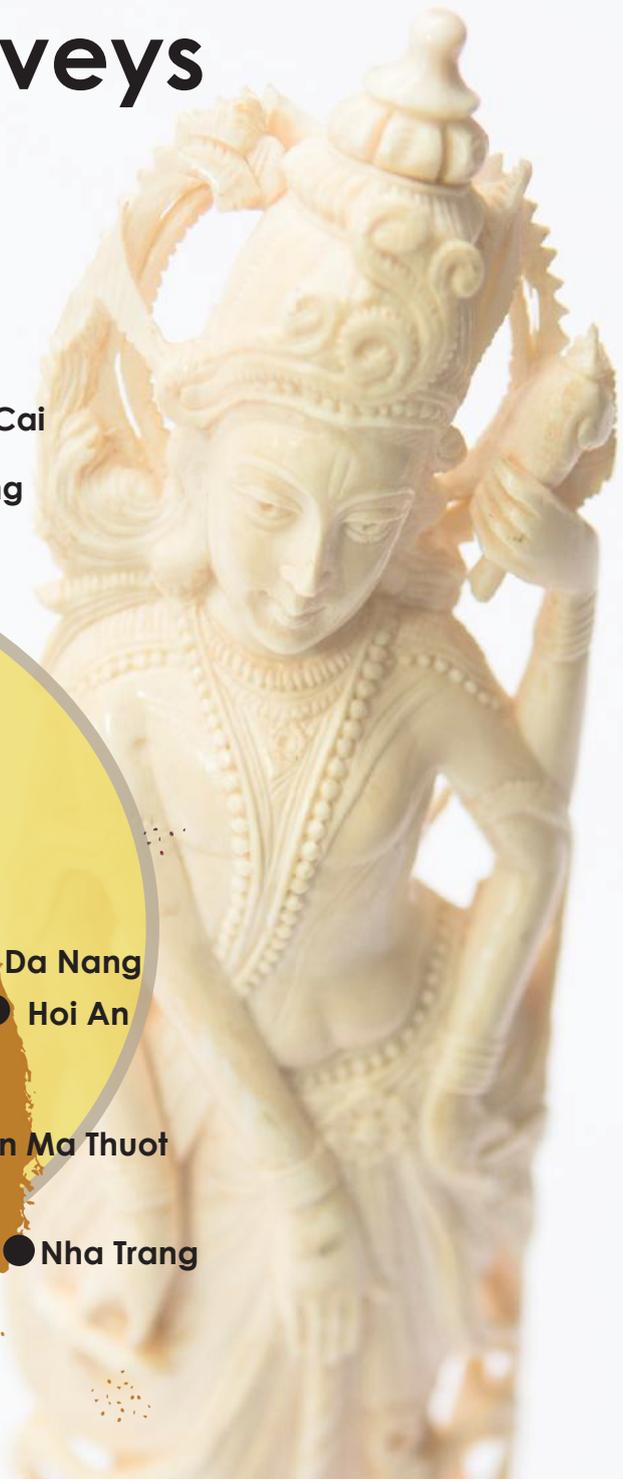
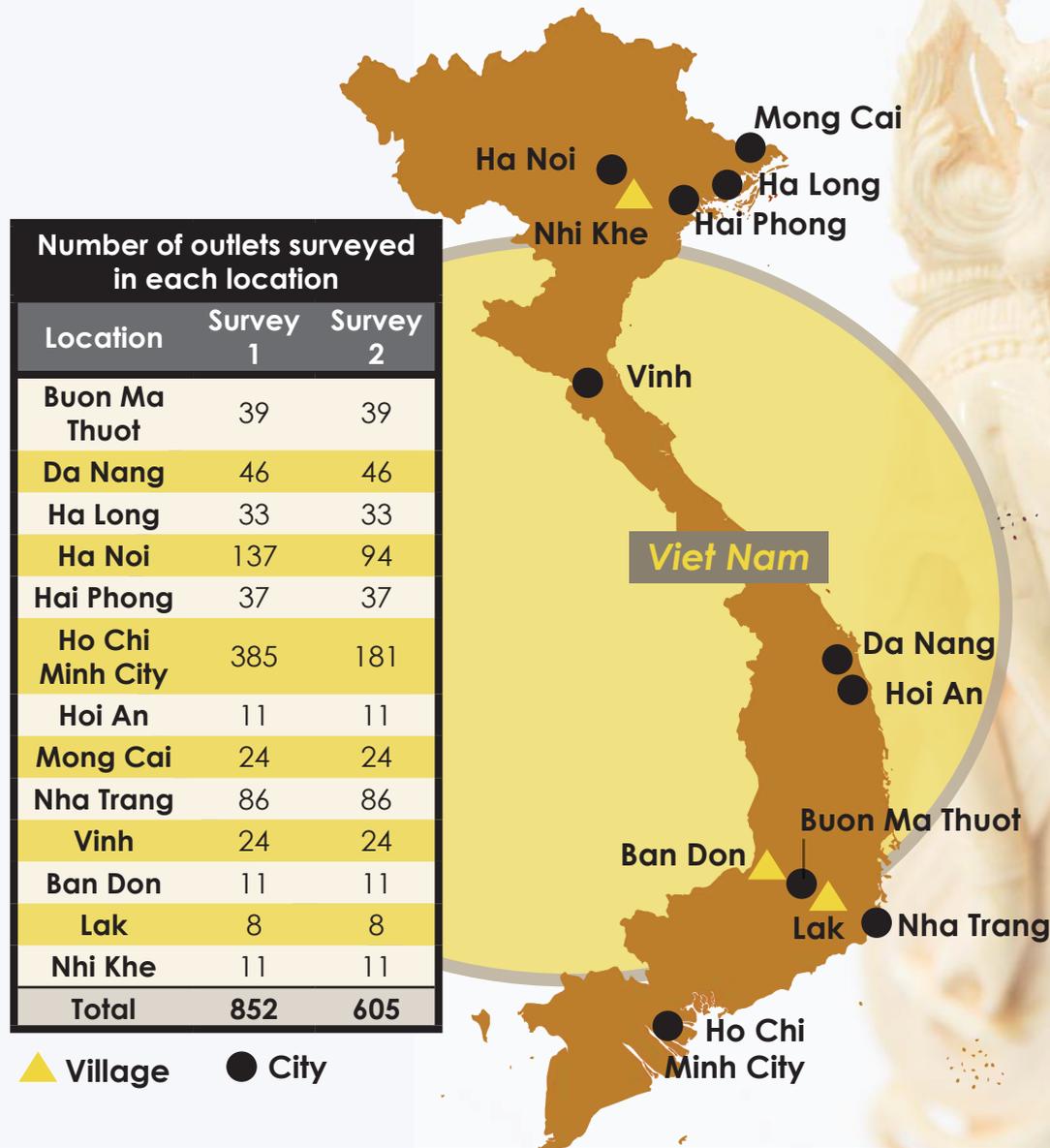
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Physical Market Surveys

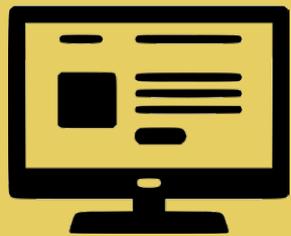
Survey 1: Nov 2016–Mar 2017

Survey 2: May–June 2017



Online Market Surveys

Mar–Apr 2017



2
Social Media
Platforms

10
E-commerce
Websites

5
Online
Forums

60 online
sellers across
17 platforms

852 physical
outlets across
13 locations

4,363 items found
in online outlets
6,186–9,097
items found in
physical outlets

90%
of items on
sale were
jewellery



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DEFINITIONS OF TERMS

Advertisement	An advertisement found on an online platform designed to buy/sell/trade goods
Post	A post on an online platform for which the primary purpose is not to buy/sell/trade goods, but identified by text and/or photos as offering item(s) for sale
Buyer	An individual who has purchased, or attempts or intends to purchase ivory items
Geographical association	The geographical location with which an online seller is associated via the geotag in the post, profile information, or otherwise, but not necessarily the permanent physical location of the seller
Geotag	A geographical location attached to or embedded in a photograph, video, online posting, etc.
Groupings	Online groupings specific to a particular online platform (often a sub-set within that platform) that may or may not include multiple online sellers, such as Facebook groups and Instagram accounts, but also an e-commerce website and an online forum
Ivory item	Any items made of or containing ivory as observed in the physical market or described/observed in online advertisements
Locations	Any and/or all of the villages and cities visited in the physical market surveys
Online platform	A platform accessed via a web address including, but not limited to, the following: social media websites, e-commerce websites, and online forums
Online survey	The online market survey undertaken in April 2017
Outlet	Any individual physical location recognised by its physical address and name
Seller	An individual present at the outlet; a unique online account, identified by a profile name and corresponding information, often referred to as an “online seller.” Online sellers can be online stores, online portals, uncategorised sellers, or online individuals
Survey	To check a physical outlet or online platform for the availability of ivory and record information related to the availability, or lack thereof
Survey 1	The first-round physical market survey undertaken from November 2016–March 2017
Survey 2	The second-round physical market survey undertaken from May–June 2017

ACRONYMS & ABBREVIATIONS

CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CNY	Chinese Yuan
HCMC	Ho Chi Minh City
KG	Kilogramme
NIAP	National Ivory Action Plan
SMS	Short Message Service
USD	United States Dollar
VND	Vietnamese Dong

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About Wildlife TRAPS

The USAID-funded Wildlife Trafficking, Response, Assessment and Priority Setting (Wildlife TRAPS) Project is an initiative that is designed to secure a transformation in the level of co-operation among stakeholders who are impacted by illegal wildlife trade between Africa and Asia. The project is designed to increase understanding of the true character and scale of the response required to set priorities, identify intervention points, and test non-traditional approaches with project partners.

About USAID

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Ivory items for sale in Ha Long, Viet Nam © TRAFFIC

EXECUTIVE SUMMARY

The physical market availability of ivory has been well documented in Viet Nam, but online market availability less so. Recently, there has been evidence of the emerging use of online channels to sell illegal wildlife products, particularly ivory. However, Viet Nam's ability to enforce a ban on ivory sale, whether physical or online, is hampered in its effectiveness by an unclear regulatory framework.

This report provides an update on the ivory market in Viet Nam (including prices, volumes, and locations), explores changes in market availability in physical locations at two different points in time, and further investigates online trade in ivory and its relation to the physical market. A total of three surveys were conducted (two physical market surveys and one online survey) between November 2016 and June 2017. Ivory was found for sale at all 13 of the physical locations surveyed: Ban Don, Buon Ma Thuot, Da Nang, Ha Long, Ha Noi, Ho Chi Minh City, Hoi An, Hue, Mong Cai, Nhi Khe, Lak, Nha Trang, and Vinh. Ivory was also found on all three kinds of online platforms surveyed: social media websites, e-commerce websites, and online forums. In total, 852 physical outlets and 17 online platforms were surveyed, and a minimum of 10,549 ivory items and a maximum of 13,460 ivory items were observed for sale (6,186–9,097 in physical outlets and 4,363 items from online sellers). These findings demonstrate that both physical and online ivory markets persist throughout Viet Nam, likely due to demand from both domestic and international consumers.

Physical outlets in Ho Chi Minh City and Buon Ma Thuot had the highest number of items for sale. However, two villages (Ban Don and Lak) represented a disproportionately high number of

"These findings demonstrate that both physical and online ivory markets persist throughout Viet Nam, likely due to demand from both domestic and international consumers."

items when compared to the number of outlets selling ivory. Amongst the online platforms, social media websites had the highest number of ivory posts and items for sale. Clear links between physical markets and online outlets were found in this survey. In eight instances online sellers were either linked to physical stores or physical stores were also selling their items online.

Eight different types of ivory items were observed, but ivory jewellery items accounted for over 90% of all the items found online and in physical outlets. Prices for ivory products varied widely, from USD7 to USD2,637, but only 154 items were priced over USD200. Although sellers consistently reported Viet Nam as the origin of the ivory for sale, the population of wild elephants in Viet Nam is estimated at fewer than 100 individuals. Thus, it is highly likely the ivory originates from elsewhere, noting that most of the ivory seized in Viet Nam in the last few years has arrived from range countries of the African Elephant *Loxodonta africana*.

The involvement of China and Chinese nationals in the Vietnamese ivory trade remains particularly noteworthy. Ivory market availability linked to tourism was observed in the following locations: Ha Long, Mong Cai, Ban Don, and Lak. The price of some ivory items was quoted in foreign currencies, such as Chinese Yuan and United States Dollars. Chinese nationals were reported as buyers by multiple sellers, and sellers in the physical outlets offered to send items directly to China.

As in previous surveys, sellers know that selling ivory is illegal, but this knowledge does not deter them from offering it openly for sale in Viet Nam. The poor regulatory framework, such as the legal grey area stemming from Decree 18/1992/HDBT and the 2 kg minimum threshold required to trigger the amended Penal Code 100/2015/QH13, hampers the ability of Vietnamese law enforcement agencies to regulate the open sale of ivory in physical and online markets effectively. The following recommendations stem from the findings and analysis of the research.



"Sellers know that selling ivory is illegal, but this knowledge does not deter them from offering it openly for sale in Viet Nam."

Ivory items for sale in Ban Don, Viet Nam © TRAFFIC



RECOMMENDATIONS

Recommendations for the Vietnamese Government

Increase deterrents against criminal activity:

- Close the legal loopholes relating to the trade in Asian and African elephants and their parts by: 1) amending Decree 32/2006/ND-CP to clarify that it applies inclusively to Asian Elephant *Elephas maximus* parts exploited and used prior to 1992; 2) clarifying that both Asian and African elephants and their parts are equally prohibited from trade in Viet Nam thus closing any loopholes that may be used to launder ivory from one species or the other; and 3) eliminate the 2 kg minimum threshold for the application of the amended Penal Code as the majority of worked ivory products found on the market in this report do not meet that threshold and would thus be exempt from criminal penalties.
- Increase capacity building for law enforcement officers to identify and understand contemporary marketing tactics used to reduce the risk of detection in illegal wildlife trade, such as the open use of Chinese-language advertisements for ivory at physical outlets and the ease of opening new groups on online platforms.
- Adapt and apply existing regulatory frameworks to ensure effective law enforcement against online trading channels, including the development of capacity to detect and combat illegal online trade in ivory products, particularly on social media. The Vietnamese government is encouraged to develop a special law enforcement unit to focus on online ivory trading, given that policing online marketplaces involves a different skillset than that of physical markets.
- Conduct an ivory stockpile inventory, including an assessment of storage facility security, marking, and management of stocks, in accordance with CITES Res. Conf. 10.10 (Rev. CoP17).

Restrict the market availability of ivory:

- Law enforcement agencies should target resources at locations with a high density of outlets selling high volumes of ivory, such as in Ban Don and Ho Chi Minh City, where coordination and logistics needs are minimal, but law enforcement efforts would have a high impact. Efforts should also be put towards streamlining the reporting of illegal ivory trade (online or physical markets) to provide current, accessible, and actionable information to law enforcement and the service providers behind the outlets/platforms. In some instances, members of law enforcement and the public can report illegal or questionable advertisements directly through the relevant online platform. Other reporting avenues, such as the Environmental Police Online Reporting Platform, the Education for Nature – Viet Nam phone hotline (18001522), and the mobile application Wildlife Witness can also be used to report both physical and online market availability of wildlife.
- Law enforcement agencies, with assistance from NGOs and cyber security experts, are urged to work with the online sector actively to moderate the illegal selling of ivory and improve reporting mechanisms on their platforms.
- Law enforcement agencies are encouraged to regularly confiscate visible ivory products (and items stored out of sight) in identified locations and continue to re-survey outlets and cities known previously to offer ivory, as markets can easily appear and disappear over short periods of time.



Recommendations to all stakeholders

Stay up to date on market trends:

- Conduct regular physical market surveys using standardised methodology, particularly in areas with known ivory markets and existing or developing domestic and international tourism. Although it is challenging to conduct full-scale market surveys on a regular basis, rapid surveys using standardised methods can be used to continue tracking trends in key markets, to understand buyers, including the role of tourists, and other emerging trade dynamics.
- Conduct regular online market surveys using standardised methodology with a concentration on social media websites and platforms. Conducting online market surveys is less cumbersome than physical market surveys and it is important to continue gathering data to better understand the online ivory market and ivory sellers' use of multiple channels.
- Stay alert to and share with law enforcement agencies any avoidance tactics used by sellers and buyers, such as displaying fake ivory while storing genuine ivory off-display.

Reduce consumer demand:

- Implement consumer market research on the ivory trade to gain an understanding of the motivations and practices of those purchasing ivory in physical and online markets
- Develop and implement social and behaviour change communication campaigns to change the behaviour of consumers purchasing ivory in Viet Nam.
- Robustly evaluate demand reduction efforts by assessing the baseline of reported market availability and changes in motivations and intention to purchase ivory.



Ivory items © TRAFFIC





Ivory pendants for sale in Ho Chi Minh City, Viet Nam © TRAFFIC

INTRODUCTION

The physical market availability of ivory in Viet Nam has been documented and surveyed since 1990. This report provides an update on the availability of ivory in the Vietnamese market, explores changes in the physical market availability over a period of seven months, and further investigates the online availability of ivory and its relation to the physical market.

In late 1990 and early 1991, Martin (1992) observed ivory for sale in Hanoi and Ho Chi Minh City in approximately 81 outlets but did not report the number of items observed. In 2000, ivory was found for sale in seven cities in Viet Nam but neither the absolute number of items found nor the number of outlets selling ivory was reported (Anon., 2002). In 2001, Martin and Stiles (2002) recorded 3,309 ivory items for sale at 50 outlets during a physical market survey in three cities. The authors suggested that the ivory trade in Viet Nam was slower at that time than in the previous five years and that the number of outlets selling ivory had decreased significantly in comparison with observations made in the late 1970s. The quantity of worked ivory observed for sale continued to decline in Viet Nam. In 2008, Stiles conducted a larger survey and found 2,444 ivory items for sale at 73 outlets in eight cities, 28% fewer items than in 2001 (Martin and Stiles, 2002). In 2014, fewer ivory items (2,254) were observed for sale at fewer outlets (84) when surveying more locations (21) and outlets (1,612) than in either 2001 or 2008 leading researchers to conclude that the overall market availability continued on a downward trend in Viet Nam (Nguyen and Willemsen, 2015). In contrast to these noted declines in observable trade, based on observing 16,099 ivory items at 408 outlets in six locations during 2015, Vigne and Martin estimated that the Viet Nam illegal ivory trade was one of the largest in the world (Vigne and Martin, 2016). The significant discrepancy between findings of Nguyen and Willemsen (2015) and Vigne and Martin (2016) can be attributed to non-comparable survey efforts, specifically that the latter survey included extensive coverage of two artisanal villages north of Ha Noi and four villages south of Ha Noi, including Nhi Khe (a location which later received international attention for its emerging ivory carving businesses). An investigation by Liu conducted in 2015 reported Viet Nam's transition towards becoming a manufacturing hub for wildlife

products, including ivory, further supporting the finding that carving villages play a role in Viet Nam's ivory trade (Liu, 2015). In addition, it is worth noting that the presence of Chinese buyers was recorded in all of these surveys (Martin, 1992; Anon., 2002; Martin and Stiles, 2002; Stiles, 2008; Nguyen and Willemsen, 2015; Vigne and Martin, 2016) and in two investigations (Stiles, 2004; Liu, 2015). Both the fluctuation of ivory availability and the Chinese involvement in the trade are further investigated in this report.

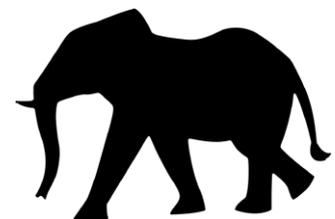
Recently, evidence has shown the emerging use of the internet to sell wildlife products, both legally and illegally, throughout Asia. A month-long TRAFFIC study of the online ivory market in China in 2013 found over 514 ivory, rhino horn, and Helmeted Hornbill *Rhinoplax vigil* casque items (Xiao and Wang, 2015). Another survey into the online wildlife market in China was conducted by the International Fund for Animal Welfare (IFAW) over six weeks in 2014 and found 18,590 live animals, parts, and products for sale, such as ivory, rhino horns, turtles, and tortoises (IFAW, 2014). In 2016, during a five-month study into the wildlife trade on Facebook in Peninsular Malaysia, TRAFFIC found over 300 live mammals, birds, and reptiles for sale (Krishnasamy and Stoner, 2016). As recently as 2017, TRAFFIC documented 2,245 posts offering a minimum of 5,082 live reptiles from 115 taxa for sale during a three-month survey (Sy, E. Y., 2018).

However, in Viet Nam, TRAFFIC has only documented the online trade in ivory on two occasions. In 2016, TRAFFIC conducted a wildlife e-commerce survey in which it recorded 18 ivory jewellery items for sale on two e-commerce websites over a period of 23 days (Nguyen and Willemsen, 2016). In the same year, TRAFFIC identified 385 posts offering 4,949 ivory items for sale during a 25-day survey on social media websites (Indraswari *et al.*, in prep). However, at least one other survey has also identified ivory for sale online in Viet Nam. Between October 2015–April 2016, WildAct found 26,498 wildlife products for sale on social media in Viet Nam ranging from ivory, to Asian big cat skins, to bear claws (Nguyen, T., 2016). Viet Nam has one of the highest proportions of social media users in the world (Statista, 2017) which demonstrates a vibrant social media market for many commodities, including wildlife. These survey findings are cause for concern and warrant further research into the online ivory market in Viet Nam.

At the 16th Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP16) in 2013, based on the Elephant Trade Information System (ETIS) analysis, nine countries and territories¹, including Viet Nam, were identified as playing paramount roles in the illegal ivory trade (CoP16 Doc. 53.2.2 (Rev.1)).

¹ China prepared a separate NIAP for Hong Kong SAR.

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Designated as being of “primary concern,” these countries and one territory were subjected to an intersessional oversight mechanism under the direction of the CITES Standing Committee that has become known as the National Ivory Action Plan (NIAP) process; time-bound, national-level action plans were required to address various actions pursuant to the categories listed in Table 1. Viet Nam was thus encouraged to submit periodic reports to the CITES Secretariat for review at Standing Committee meetings in order to track progress in the implementation of its action plan. In 2016, the CITES Standing Committee concluded that Viet Nam had “substantially achieved” most of its NIAP goals but reflected on the need to continue implementing actions to combat the illegal ivory trade (CoP17 Doc. 24 (Rev. 1)); the ETIS report at CoP17 again identified Viet Nam as being of “primary concern” in the illegal ivory trade. Viet Nam’s self-assessed progress against the NIAP thematic areas at the 66th and 67th meetings of the CITES Standing Committee in 2015 and 2016 can be seen in Table 1. Notably, at the 66th Standing Committee the establishment of a national database on ivory management was reportedly “on track” (SC66 Doc. 29 Annex 11). However, at the 67th Standing Committee, no progress evaluation was provided for this activity and it is unclear what the status of the national database is currently (SC67 Doc. 13 Annex 6). Furthermore, Viet Nam reports that ministerial decisions regarding the establishment of a national stockpile have been issued and relevant agencies have been requested to send all specimens to the stockpile (Decision No. 2329/QĐ-BNN; SC66 Doc. 29 Annex 11; SC67 Doc. 13 Annex 6). However, it is unclear whether these decisions have been acted upon, including whether there now exists a consolidated national inventory of seized ivory stocks.

Table 1. Viet Nam’s self-assessed progress against the NIAP thematic areas as reported to SC66 and SC67

Category	SC66 progress ratings (self-assessment by Parties)		SC67 progress ratings (self-assessment by Parties)	
	Substantially achieved	On track	Substantially achieved	On track
Legislation and regulation	71% (5/7 actions)	29% (2/7 actions)	100% (7/7 actions)	
Wildlife enforcement capacity building	100% (2/2 actions)		100% (2/2 actions)	
Investigation and law enforcement responses	100% (5/5 actions)		100% (5/5 actions)	
Strengthening co-operation and sharing information	67% (2/3 actions)	33% (1/3 actions)	67% (2/3 actions)	33% (1/3 actions)
Anti-corruption	100% (2/2 actions)		100% (2/2 actions)	
Ivory stock management	50% (1/2 actions)	50% (1/2 actions)	50% (1/2 actions)	50% (1/2 actions)
Awareness raising and demand reduction	100% (1/1 action)		100% (1/1 action)	
Average	82% (18/22 actions)	18% (4/22 actions)	91% (20/22 actions)	9% (2/22 actions)

Source: SC66 Doc. 29 Annex 11 (SC66 progress ratings), SC67 Doc. 13 Annex 6 (SC67 progress ratings)

According to ETIS records, from January 2009 through December 2017, Viet Nam made 95 raw and worked ivory seizures, with a combined estimated weight of 54,962.63 kg (Tom Milliken, pers. comm., 28 February 2018) (Table 2). This represents the ivory of 5,800–8,400 African Elephants.

Table 2. Ivory Seizures Made in Viet Nam 2009–2017

Ivory Seizures Made in Viet Nam				
Year	Raw Ivory		Worked ivory	
	No. of Seizures	Weight (kg)	No. of Seizures	Weight (kg)
2017	7	5,869.90	6	84.89
2016	17	8,491.89	6	75.99
2015	10	7,428.25	2	11.31
2014	9	5,741.77	2	19.50
2013	3	4,569.05	3	271.20
2012	4	2,955.60	1	7.62
2011	9	3,996.21	1	2.50
2010	10	6,532.72	2	15.93
2009	6	8,888.30	0	-
TOTAL	75	54,473.69	23	488.94

Source: ETIS seizure data. Note that three seizures included both raw and worked ivory

Seizures were particularly high in the months surrounding the Hanoi Conference on Illegal Wildlife Trade (Hanoi Conference) (Figure 1) which was hosted by Viet Nam in November 2016. In the month prior to the Hanoi Conference, Vietnamese authorities confiscated over four and a half tonnes of trafficked ivory in five significant seizures (TRAFFIC, 2016). An additional six ivory seizures were made in the two months following the Hanoi Conference, resulting in the confiscation of nearly 2.5 tonnes of trafficked ivory, making 2016 the year in which the second greatest quantity of ivory was seized in the country after 2009. Overall, in terms of all seizures in ETIS in which Viet Nam was part of the trade route or Vietnamese nationals were involved in the transaction, 2014–2016 were the years of greatest illegal ivory trade activity.



Figure 1. Number of ivory seizures in Viet Nam from March 2016 to April 2017

*Month of the Hanoi Conference

The monitoring of the physical ivory market in Viet Nam over the last 27 years by different researchers demonstrates that this market has continued to persist and may actually have grown in recent years (see Annex 1). Table 3 outlines the 19 locations surveyed over the years in which ivory has been found for sale on at least one occasion. The continued presence of the ivory market in Ha Noi and Ho Chi Minh City (HCMC) over a period of 27 years is clearly shown. For a full list of previously surveyed locations see Annex 1.

Table 3. Surveyed locations in which ivory has been found historically

Location	1990-1991	2000	2001	2008	2014	2015	2016	2017
Ban Don	–	N	–	–	Y	Y	Y	Y
Buon Ma Thuot	–	Y	–	–	Y	Y	Y	Y
Da Lat	–	Y	–	–	Y	–	–	–
Da Nang	–	N	–	–	N	–	Y	Y
Ha Long	–	–	–	Y	Y	–	Y	Y
Ha Noi	Y	Y	Y	Y	Y	Y	Y	Y
Ha Tien	–	–	–	Y	Y	–	–	–
Hai Phong	–	Y	–	–	Y	–	Y	Y
HCMC	Y	Y	Y	Y	Y	Y	Y	Y
Hoi An	–	N	–	–	Y	–	Y	Y
Hue	–	Y	–	Y	Y	–	–	–
Kon Tum	–	Y	–	–	Y	–	–	–
Mong Cai	–	–	–	–	–	–	Y	Y
Nhi Khe	–	–	–	–	–	Y	Y	Y
Lak	–	–	–	–	–	–	Y	Y
Nha Trang	–	N	–	N	Y	–	Y	Y
Phu Quoc	–	–	–	Y	N	–	–	–
Pleiku	–	N	–	–	Y	–	–	–
Vinh	–	N	–	–	N	–	Y	Y

*Key: Yes = Y; No = N; Not surveyed = –

**Source: 1990-1991 (Martin, 1992); 2000 (Anon., 2002); 2001 (Stiles, 2002); 2008 (Martin and Stiles, 2008); 2014 (Nguyen and Willemsen, 2015); 2015 (Vigne and Martin, 2016)²; 2016 and 2017 (this survey).

² Note that for the Vigne and Martin survey two of the locations, Ban Don and Nhi Khe, were assumed based on textual descriptions in the report.

The emerging online ivory market in Viet Nam has also been monitored in three previous surveys where ivory has been found on three different platforms (social media websites, e-commerce websites, and online forums) since 2016 (Table 4).

This report provides an update on the availability of ivory in the physical and online markets in Viet Nam and investigates the linkages between the two types of markets. Additionally, the research for this report was undertaken in the lead up to the implementation of Viet Nam's Penal Code No. 100/2015/QH13 along with Law No. 12/2017/QH14 Amending and Supplementing a number of articles in the Penal Code No. 100/2015/QH13 and provides a baseline with which to evaluate the impact of the Penal Code amendments on the physical and online ivory market in Viet Nam.

Table 4. The availability of ivory on online platforms in Viet Nam

Platforms	2015	2016a	2016b	2017
Social media websites	✓	–	✓	✓
E-commerce websites	–	✓	–	✓
Online forums	–	✓	–	✓

Key:

Ivory available = ✓
Not surveyed = –

Source: 2015 (Nguyen, T., 2016); 2016a (Nguyen and Willemsen, 2016); 2016b (Indraswari et al., in prep) and 2017 (this publication).



African Elephants © James Suter / Black Bean Productions / WWF-US

LEGISLATION

Viet Nam has been a signatory to CITES since 1994. The country is ranked as having Category 1 legislation under CITES Resolution Conf. 8.4 (Rev. CoP15) on National laws for implementation of the Convention (CITES SC66 Inf. 19, 2016), meaning Viet Nam's legislation framework is "generally believed" to meet all requirements for the implementation of CITES. However, the mechanism for ranking national legislation is largely dependent on self-reporting from the Parties and has been subject to scrutiny (e.g. Moore *et al.*, 2016). In 2016, CITES encouraged Parties with Category 1 legislation voluntarily to review their legislation (Decision 17.60) but has received no responses to date.

Viet Nam has a complex environmental regulatory framework with a total of 18 laws in place and enforced by different government bodies. The following five laws and regulations are specifically relevant to the trading of ivory in Viet Nam. Note that one of the most well-known wildlife protection laws in Viet Nam, Decree 160/2013/ND-CP, is not within the scope of this report as it does not regulate commercial trade.

Exploitation and use of Asian Elephant have been banned in Viet Nam since 1992. Today there are many complex regulations applied to various aspects of the ivory trade (Table 5). Due to the absence of laws regulating the trade of products made from threatened species (which Asian Elephants were considered in Viet Nam) before 1992 (Decree 18/1992/HDBT), there remains a grey area around the legal status of worked Asian Elephant ivory products alleged to have been crafted before that year. As the law prohibited the exploitation and use of Asian Elephant from that moment forward but made no mention of applicability to exploitation and use that occurred prior to the law, there is a legal grey area. Nor did the 1992 law apply explicitly to the act of trading in threatened species, exacerbating this complexity. The 1992 law has been amended by Decree 32/2006/ND-CP and Decree 160/2013/ND-CP and the Asian Elephant and products thereof was clearly prohibited from trade in 2006. However, even under the 2006 law, the issue of whether items "exploited and used" before 1992 could be traded was not resolved.

Table 5. Key laws and regulations relevant to the trading of ivory in Viet Nam

Law/ Decree Number and Title	Date	Relevance to Elephant Ivory
Decree 32/2006/ND-CP on Management of endangered, precious, and rare species of wild plants and animals (replacing Decree 18/1992/HDBT and Decree 48/2002/ND-CP)	2006	This Decree establishes two groups of species native to Viet Nam: Group I species for which harvest and trade is prohibited; Group II species for which commercial exploitation is restricted, except under certain circumstances. Species in both groups may be exploited for research or international co-operation purposes. Sub-group A is for plants, and sub-group B is for animals. The Asian Elephant is included in Group IA of this Decree, while the African Elephant is not.
Decree 82/2006/ND-CP on Management of export, import, re-export and introduction from the sea, transit, breeding, rearing and artificial propagation of endangered, precious, and rare species of wild plants and animals	2006	CITES-listed species and species protected under Vietnamese law are covered under this Decree which manages export, import, re-export and introduction from the sea, transit, breeding, rearing, and artificial propagation. This scope covers Asian and African elephants for which the above actions are prohibited. However, this Decree does not protect specimens of unclear origin/acquisition.
Penal Code Amendment No. 37/2009/QH12 Amending and Supplementing a number of articles in the Penal Code No. 15/1999/QH10	2009	According to Article 190 of this law, the acts of hunting, killing, transporting, raising, keeping and trading, of endangered, precious and rare wild animals prioritised for protection and the acts of trading and transporting of their body parts or products are prohibited. Wild animals prioritised for protection are species listed in Decree 32's Group IB and IIB. CITES Appendix I species that are not listed in Decree 32's Group IB are treated the same as Decree 32's Group IB species. The offenders shall be liable to a fine of up to VND500 million (USD22,124), subject to non-custodial reform of up to three years or a prison term of up to seven years. This law was in effect during the surveys conducted for this report but has since been amended by Penal Code No. 100/2015/QH13 of 1st January 2018.
Penal Code No. 100/2015/QH13 along with Law No. 12/2017/QH14 Amending and Supplementing articles in Penal Code No. 100/2015/QH13	2015-2017	Criminal offences include the acts of hunting, killing, raising, transporting, trading, and possessing a certain quantity of animals or their parts. Particularly for ivory, offences involving from two to 20 kg of ivory may be fined up to VND2 billion (USD92,000) or a prison term of up to five years. Offences involving 20–90 kg of ivory may be subject to a prison term of five to ten years. Offences involving more than 90 kg may be subject to a prison term of 10–15 years. Notably, this new Code adds penal liability to legal entities which was not included in previous Penal Codes. Legal entities involved in the above scenarios may be fined up to VND15 billion (USD644,000) and be required to suspend activities for up to three years. Both laws entered into force on 1st January 2018, after the surveys for this report were conducted. These penalties apply to both Asian and African elephants.
Decree 40/2015/ND-CP and Decree 41/2017/ND-CP Amending Decree 157/2013/ND-CP Administrative penalties with regards to forest management, forest development, forest protection and forest product management	2015 and 2017	Decree 157/2013/ND-CP covers penalties for administrative violations with regards to forest management, forest development, forest protection, and management of forest products, including wildlife. Endangered, rare and precious species under Decree 32's Group I and II and CITES Appendix I and II species are covered by this Decree. Offenders can be fined a maximum of VND500 million (USD22,124) for individuals and VND1 billion (USD44,248) for organisations. Both Asian Elephant and African Elephant are covered under this Decree. Decree 40/2015/ND-CP and Decree 41/2017/ND-CP amend some articles of Decree 157/2013/ND-CP, however, the penalties remain the same for administrative violations with regards to forest management, forest development, forest protection and management of forest products, including wildlife.

Meanwhile, the vast majority of the contemporary ivory trade in Viet Nam is likely made up of African Elephant ivory, for which trade is prohibited under Decree 82/2006/ND-CP. Recently, Viet Nam amended its Penal Code, which applies to both Asian and African elephants, increasing penalties for the following criminal offences: hunting, capturing, killing, raising, caging, keeping, transporting, and trading. Penalties will now be based on quantity rather than the commercial or monetary value of the product and penalties will increase as the quantity increases. However, the amended Penal Code only applies to quantities of two or more kilogrammes of ivory. Quantities below 2 kg are not covered by the amended Penal Code but may be subjected to administrative offences under Decree 157/2013/ND-CP (also applicable to both species). The minimum threshold in the amended Penal Code is cause for concern given that many ivory items found on the market would not meet the 2 kg threshold and therefore the trading of these items are not subject to criminal penalties under the amended law. This leaves the door open to small-scale traders, including traders of jewellery items—the most common item found for sale in the surveys reported here. Furthermore, it is not clarified whether the 2 kg threshold applies to individual pieces or to the total weight of all items kept, transported, or traded.



"The vast majority of the contemporary ivory trade in Viet Nam is likely made up of African Elephant ivory, for which trade is prohibited under Decree 82/2006/ND-CP."

African Elephant © James Suter / Black Bean Productions / WWF-US



Ivory for sale in Ho Chi Minh City, Viet Nam © TRAFFIC

METHODOLOGY

1.1 Physical Market Surveys

Physical market surveys were conducted on two occasions for this analysis. The first survey (Survey 1) took place over a five-month period from November 2016 to March 2017, and the second survey (Survey 2) was undertaken between May and June 2017. These two rounds of surveys were carried out in the same locations within a short span of time with the aim of assessing time-sensitive factors (i.e. tourist seasons) that could be impacting the availability of ivory in local markets. Indeed, because such long intervals of time passed between previous surveys, understanding and awareness of underlying trade dynamics were sometimes lacking. All observations have been shared with the Vietnamese CITES Management Authority.

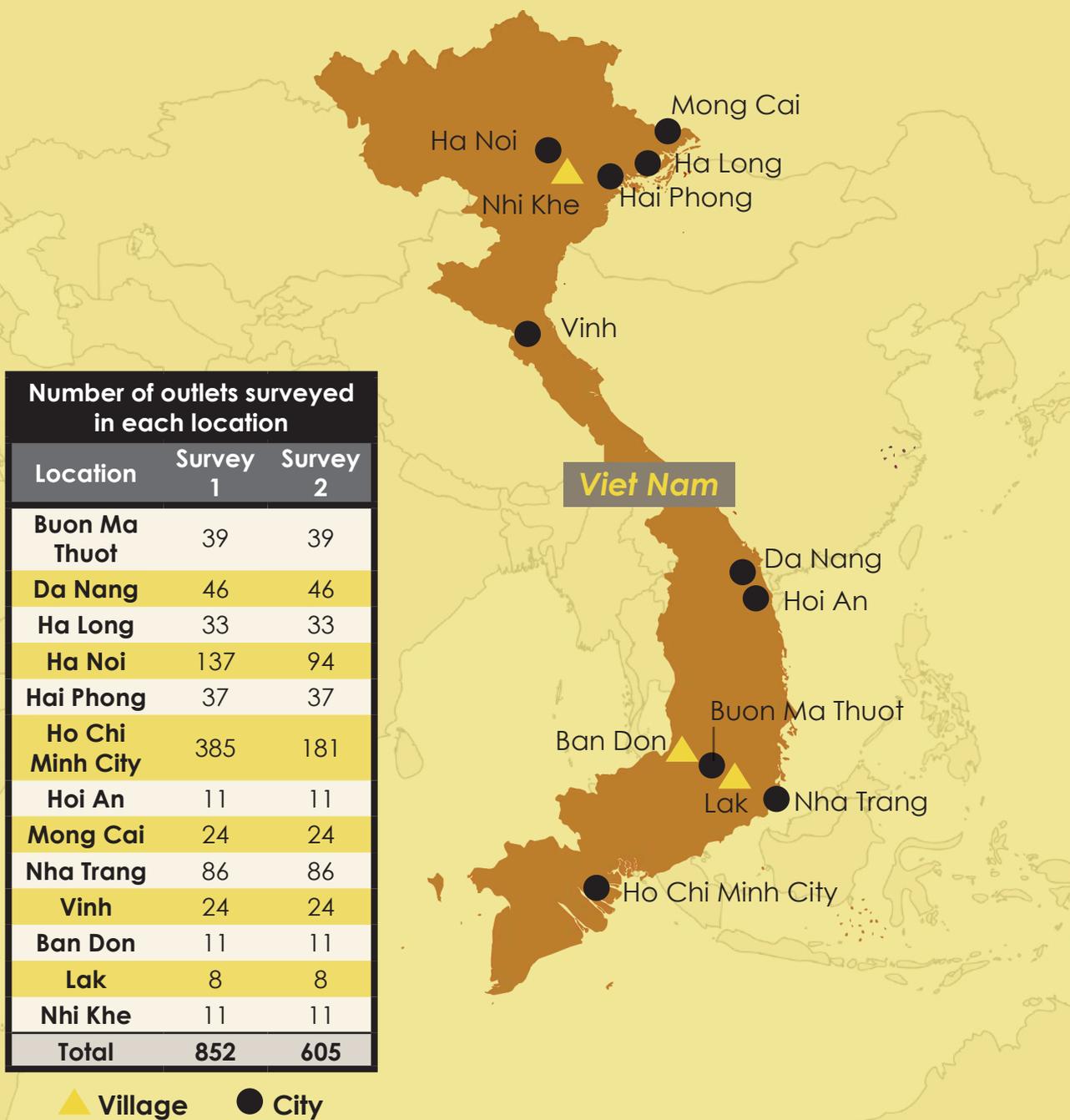
Locations

The sale of ivory products was investigated in a wide range of outlets in 13 locations across Viet Nam. These locations included 10 cities (Ha Noi, Hai Phong, Ha Long, Mong Cai, Vinh, Da Nang, Hoi An, Nha Trang, Buon Ma Thuot and HCMC) and three villages (Nhi Khe in Ha Noi; Ban Don and Lak in Daklak Province) (Figure 2). Where noted, the villages were separated from the cities in the analysis, as the outlets were exclusively handcraft and souvenir outlets and no other outlet categories were present (refer to Table 9 for outlet categories).

Survey locations were selected based on criteria such as existing data from literature and reports on the physical and online ivory trade and carving activity, recognised tourist hubs and ivory seizure data. Nineteen of the locations have been previously surveyed by other researchers (Table 3, Annex 1). Two additional locations were added to this survey due to the following reasons: Mong Cai because of recorded occurrence of ivory seizures (TRAFFIC, 2015) and Lak because it is one of the popular destinations for elephant-related tourism. During Survey 1, eight cities (Ha Noi, Hai Phong, Ha Long, Mong Cai, Vinh, Da Nang, Hoi An,

and HCMC) and one village (Nhi Khe) were surveyed from 28th November to 14th December 2016, two cities (Nha Trang, Buon Ma Thuot), and two villages (Ban Don, Lak) were surveyed in from 13th to 17th March 2017. During Survey 2, all 10 cities and three villages were re-surveyed from 4th May to 9th June 2017.

Figure 2. Map of survey locations in Viet Nam



Outlets

At each location, outlets surveyed were chosen based on: (1) outlets previously visited during TRAFFIC surveys (Stiles, 2008; Stiles, 2009; Nguyen and Willemsen, 2015); (2) information sourced from members of the public (e.g. hotel owners, taxi drivers and restaurateurs) on where to buy wildlife products in each city; and (3) outlets referenced or suggested by individuals at the surveyed outlets.

A total of 852 outlets across 13 locations were visited during Survey 1. Of these, 605 were re-surveyed in Survey 2 but only 581 outlets were in operation at that time (Table 7). Outlets referred to herein as “closed” refer to outlets that appeared closed to the general public at the time of survey (e.g. shuttered doors, out of business signs). Most of the outlets surveyed in Survey 1 were re-surveyed in Survey 2 with the exception of Ha Noi and HCMC where only 69% and 47% of outlets respectively were re-surveyed due to time and resource constraints. Comparisons of data between the two rounds of surveys in Ha Noi and HCMC are based on ratios rather than actual numbers, unless otherwise stated.

Table 6. Total number of outlets surveyed per location in Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017) and outlets closed per location in Survey 2

Location	Survey 1	Survey 2	Closed in Survey 2
Cities			
Buon Ma Thuot	39	39	2
Da Nang	46	46	2
Ha Long	33	33	1
Ha Noi	137	94	0
Hai Phong	37	37	1
HCMC	385	181	0
Hoi An	11	11	0
Mong Cai	24	24	1
Nha Trang	86	86	9
Vinh	24	24	0
Villages			
Ban Don	11	11	0
Lak	8	8	0
Nhi Khe	11	11	8
TOTAL	852	605	24

Note: In Ha Noi and HCMC, researchers re-surveyed only 69% and 47% of outlets respectively during Survey 2

Survey techniques

The surveys were conducted by a Vietnamese researcher and occasionally joined by non-Vietnamese researchers. All researchers were trained in ivory identification techniques. Ivory items were checked for authenticity using the standardised methods described by Espinoza and Mann (1999). Ivory items that were openly displayed and items brought out from concealed areas at the will of the seller were counted. Where possible, photos were taken of products for sale.

Where possible, sellers at outlets selling ivory were queried about four aspects of the ivory trade and market: the price and currency of items for sale, the origin of products, the profile

of the buyers, and awareness of illegality (of trade, purchase, and/or possession). Questions were asked using a semi-structured interview technique, mainly in Vietnamese. Occasionally, questions were asked in Mandarin or English. Researchers noted any advertisements for ivory observed at the outlets in Vietnamese, Mandarin, or English.

The price of ivory items observed for sale was recorded as the value of one complete piece of ivory (pairs of earrings/chopsticks were counted as one complete piece) inclusive of any precious gems and/or precious metals that were attached to the ivory. All openly advertised prices were recorded, or the first price mentioned by traders; no bargaining was conducted. The currencies used at each outlet were also noted by the researchers. All prices in this report are presented in USD unless otherwise stated. The conversion rates were as follows: CNY6.9 = USD1 and VND 22,751 = USD1, an average of the official conversion rates on 28th November 2016 and 4th May 2017.

1.2 Online Market Survey

An online survey was undertaken for 25 working days (Monday to Friday) from 27th March to 28th April 2017 on 17 platforms, including social media websites and e-commerce websites and online forums. Survey effort was fixed at one hour per day, with researchers systematically surveying the 17 platforms. However, based on the volume of advertisements/posts posted, the researcher was only able to survey between one and five platforms per day within the allocated survey effort time. The research captured advertisements/posts with date stamps from 1st January 2017 to the date of monitoring, effectively capturing data from a period of four months. Online survey methodology was based on TRAFFIC's previous online survey methodology in Viet Nam (Indraswari *et al.*, in prep; Nguyen and Willemsen, 2016). All observations were shared with the Vietnamese CITES Management Authority.

Platforms and websites

The online ivory market was monitored on two social media websites, 10 e-commerce websites, and five online forums (Table 8). These included web addresses ending in both .vn and .com. Surveyed platforms were pre-determined and chosen based on existing data from literature and reports on the wildlife trade, particularly ivory, and commercial market data. Names of surveyed platforms have been redacted for publication to avoid tipping off traders and providing the names of websites where wildlife products can be purchased to potential consumers.

TRAFFIC previously found ivory offered for sale on social media websites included in this survey (Indraswari *et al.*, in prep.). Viet Nam has one of the highest numbers of social media users in the world, with social media reaching at least 66% of all internet users on a daily basis (Statista, 2017). E-commerce websites and online forums were selected from a published list of websites with the highest sales revenues by the Vietnam E-commerce and Information Technology Agency (VECITA, 2015), a government body that monitors the economic status of e-commerce trade and websites in Viet Nam. Other e-commerce websites and online forums were chosen based on information from previous surveys (WCS, 2013; Nguyen and Willemsen, 2016).

Groupings

Within the surveyed sites, a total of 29 different groups, accounts, websites and forums (i.e. groupings—see Table 7) were identified based on: (1) groupings previously investigated by previous online surveys (WCS, 2013; Nguyen and Willemsen, 2016; Indraswari *et al.*, in prep.); and (2) Vietnamese keyword searches (Table 8).

Table 7. Categories of surveyed Online Platforms and number of sites, groupings surveyed on each platform in March–April 2017

Online Platforms	No. of Platforms	No. of Groupings	Definition of Terms
Social media	2	14	Community-based platforms intended for social networking with public/private communication channels
E-commerce websites	10	10	Formalised and registered business websites
Online forums	5	5	Public/private discussion sites in the form of posted messages
TOTAL	17	29	

Survey techniques

Advertisements/posts were found by entering Vietnamese key search terms (Table 8) into the search function of the platform or groupings' search functions. Only Vietnamese-language advertisements/posts were surveyed and recorded. Although the research effort took place in March–April 2017, advertisements/posts with a date stamp (i.e. posting date) between 1st January 2017 and 28th April 2017 were recorded. This allowed the survey to capture data from a four-month period. Traders frequently delete posts when items have been sold and it is understood that this method captures fewer posts the further back in time it looks. Data extracted from the advertisements/posts included the type and quantity of ivory items for sale. Where possible, the price, seller information, and methods of communication and payment were also recorded. Information about the sellers (i.e. physical location, telephone number, etc.) was recorded based on the publicly available information in the online advertisements/posts and/or the seller profiles associated with those advertisements/posts. This information was recorded to share with authorities, but also to identify links between online profiles and physical outlets, such as locations, names of people, and names of physical outlets. Screenshots of the ivory advertisements/posts were also captured. No direct contact was made between the researchers and the sellers and publicly available information was not otherwise verified or corroborated by the researchers. The prices and associated details were recorded based on publicly available information from all platforms, where available, and in the same manner as in the physical market surveys.

"Viet Nam has one of the highest numbers of social media users in the world, with social media reaching at least 66% of all internet users on a daily basis."



Table 8. List of Vietnamese keywords used for research

No.	Vietnamese Keywords	English Translation
1	Ngà voi / ngà	Ivory
2	Ngà voi thật / ngà thật	Genuine ivory
3	Bán ngà voi / bán ngà	Sell ivory
4	Mua bán ngà voi / mua bán ngà	Sell-buy ivory
5	Trang sức ngà voi / trang sức ngà	Ivory jewellery
6	Chạm khắc ngà voi / chạm khắc ngà	Ivory carvings
7	Tẩu	Smoking pipe
8	Tẩu ngà voi / tẩu ngà	Ivory smoking pipe

1.3 Data Biases and Challenges

It is acknowledged that confirming the authenticity of ivory offered for sale online without physical access to the items is extremely difficult, if not impossible. The advertisements/posts referenced in this report refer only to advertisements/posts in which the researcher was able to ascertain reasonably that the ivory offered for sale was authentic based on any/all the following factors: photo, price, location and/or text.

To avoid inflating the number of advertisements/posts and items present within, only advertisements/posts with images were recorded. Care was taken to review and eliminate duplicate advertisements/posts (i.e. exact same image and text) from the analysis, including those that were posted on different dates within the timeframe covered by the survey. It was assumed that there was no cross-over of items observed in the physical market with those observed on the online market because none of the online platforms/profiles mentioned by physical market sellers were intentionally surveyed and none of the physical outlets mentioned by online platforms/profiles were intentionally surveyed.

The number of ivory items recorded for sale was determined based on the wording/photos accompanying the advertisement/post, excluding any wording/photos found in the comments section of the advertisement/post. On all platforms, for advertisements/posts in which the number of items was difficult to determine from the wording/photos, the highest number reasonably determinable to the naked eye was recorded. The results in this report represent a minimum number of ivory items for sale online and may be an underestimation of actual online trade volume.



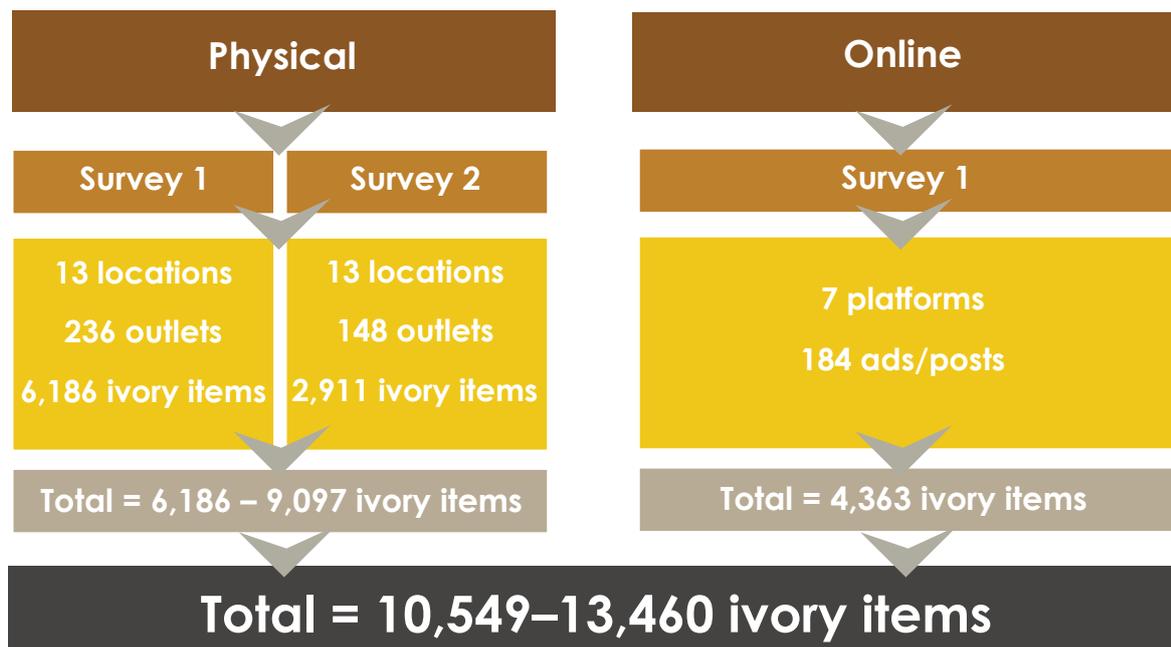
Ivory necklaces and pendants for sale in Ha Noi, Viet Nam © TRAFFIC

RESULTS

Overview

The physical market surveys found a minimum of 6,186 and a maximum of 9,097 ivory items offered for sale in 292 outlets across 13 locations. The online market survey found 4,363 ivory items offered for sale in 184 advertisements across seven platforms (Figure 3). In all surveys, the majority of the ivory items found for sale were jewellery items. The detailed results of the physical market surveys and the online survey are discussed below. It is important to note that the overall number of items recorded in all three surveys represents a minimum number of items available on the market. The ivory items observed in these surveys were on open display or publicly accessible online and likely do not reflect the number of items truly available for sale.

Figure 3. Overview of the market availability of ivory in Viet Nam from November 2016–June 2017



2.1 Physical Market Surveys

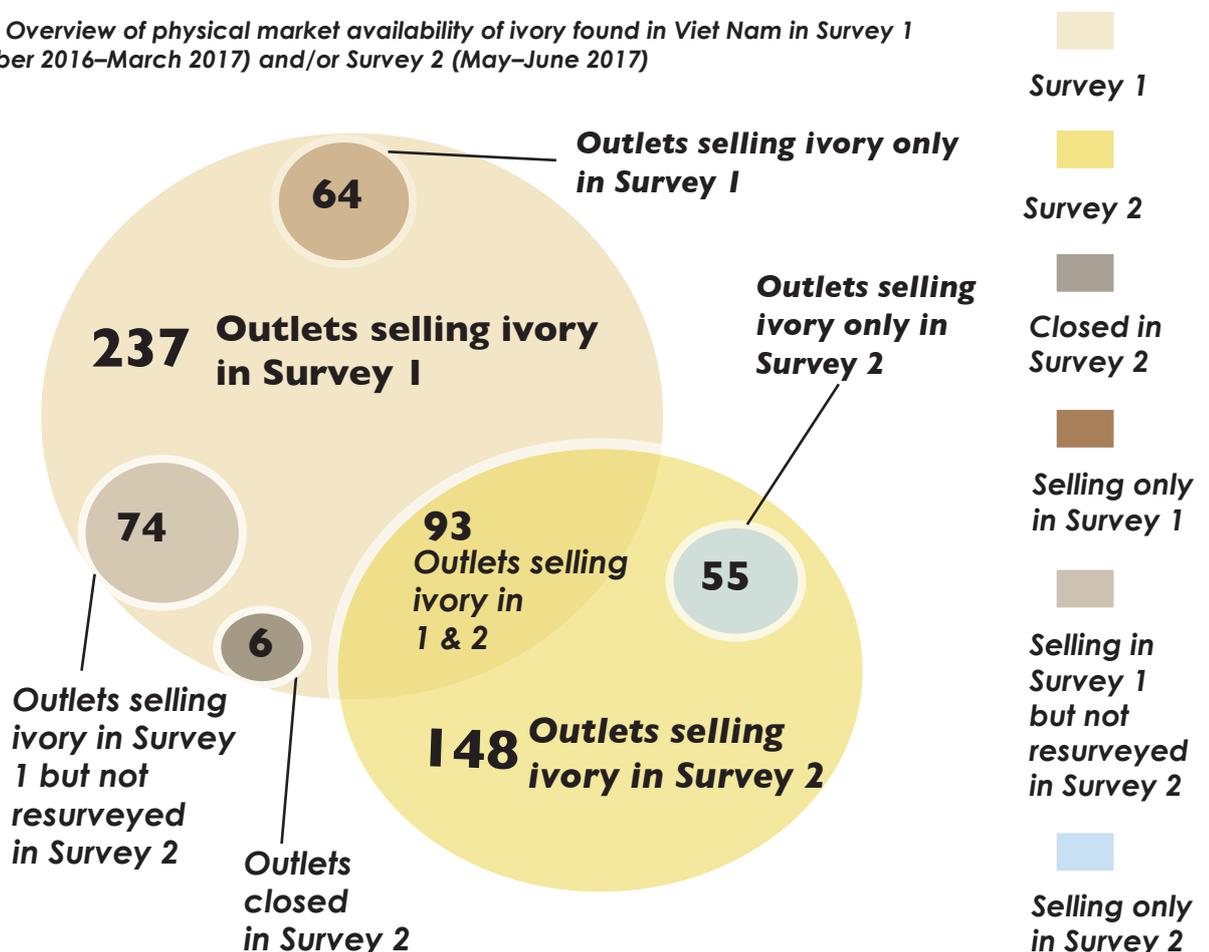
Figure 4. Overview of physical market availability of ivory found in Viet Nam in Survey 1 (November 2016–March 2017) and/or Survey 2 (May–June 2017)



Outlets

Of the total 852 unique physical outlets surveyed, only 292 were offering ivory on at least once occasion during Survey 1 and/or Survey 2, although 74 were not re-surveyed during Survey 2. Additionally, 13 of the same outlets that TRAFFIC found selling ivory in 2014 were also selling ivory in 2016 and/or 2017. While 93 unique outlets were selling ivory in both Survey 1 and Survey 2, changes were observed in 125 outlets. These included 70 outlets that were found selling ivory in Survey 1 but not during Survey 2 (including six that were closed in Survey 2), and 55 outlets that were selling ivory only in Survey 2 (Figure 5). These findings indicate that the outlets selling ivory are quite flexible with many going from offering ivory for sale to not offering ivory for sale, or vice versa, within the span of eight months or less. This underlines the fact that the presence or absence of ivory in physical outlets on any given day could be very temporary.

Figure 4. Overview of physical market availability of ivory found in Viet Nam in Survey 1 (November 2016–March 2017) and/or Survey 2 (May–June 2017)



In terms of category, a wide range of different outlets were surveyed and are categorised in Table 9. Ivory items were observed for sale at all categories of outlets. Gold/jewellery outlets accounted for the highest number of outlets selling ivory (n=207), followed by souvenir outlets (n=48), and antiques outlets (n=28). There were less than seven handicraft, miscellaneous, and/or décor/furniture outlets selling ivory (Table 9). Details on the number of outlets surveyed in Survey 1 and Survey 2, the number of outlets selling ivory, and the number of ivory items found by location can be found in Annex 2.

Table 9. Number of unique outlets selling ivory by category found in Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017) in Viet Nam

Category of outlet	No. of unique outlets selling ivory	Defining characteristics
Antiques outlet	28	Outlets specialising in the selling of antiques
Décor/Furniture outlet	1	Outlets selling home decorations and furniture
Gold/Jewellery outlet	207	Outlets selling jewellery items made of precious metals, gems and other materials
Handicraft outlet	6	Outlets selling objects that were either hand-made or made by basic tools
Miscellaneous outlet	2	Outlets selling items of various categories. For example, an outlet having one cabinet displaying ivory and other cabinets offering plastic houseware
Souvenir outlet	48	Outlets selling common gift items, mostly for tourists
TOTAL	292	

Ivory items observed for sale

A total of 6,186 ivory items were observed for sale in Survey 1 and 2,911 were observed for sale in Survey 2. Thus, the total number of ivory items available in the physical market was a minimum of 6,186 and a maximum of 9,097 (Figure 4). In both surveys, HCMC and Buon Ma Thuot were the two locations selling the highest number of items, followed by Ban Don and Ha Noi.

Significant decreases in the quantity of ivory for sale in Survey 1 versus Survey 2 were seen in Nhi Khe (132 versus one) and Ha Long (174 versus 21). Increases in the quantity of ivory for sale in Survey 1 versus Survey 2 were seen in Da Nang (44 versus 65) and Vinh (7 versus 15) (see Discussion). The increases in these two locations are of particular interest because two previous surveys conducted by TRAFFIC (Anon., 2002 and Nguyen and Willemsen, 2015) found no ivory in either location. In this survey, researchers not only found ivory for sale during Survey 1 where it had not been found before, but also found larger quantities of ivory for sale in a higher number of outlets in both locations during Survey 2. During the study period for this report, eight outlets in the same market and on the same streets surveyed in Da Nang in 2014 were selling ivory where none had been observed before.

Ivory items observed for sale included all ivory product types described in Table 10. In both surveys, the majority of the ivory items found for sale were jewellery items (94% of all items in Survey 1 and 96% in Survey 2). None of the other categories of ivory products made up more than 3% of the total volume of ivory individually. Statues and beads remained the second and third most commonly sold products in both surveys. The frequency of all other items (i.e. tableware, decorative items, raw ivory, etc.) varied between the two surveys. A detailed list of all items recorded during both rounds of the survey can be found in Annex 3. The types of ivory items observed for sale were categorised as follows:

Table 10. Categories of ivory items for sale in Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017) in Viet Nam

Category of Items	Definition of Terms
Beads	Loose ivory beads, i.e. not part of a bracelet or necklace
Decorative items	Processed ivory believed to be for decorative purposes, other than a statue
Jewellery	Any piece of jewellery that is made in whole or in part from ivory, e.g. bangle, bracelet, brooch, comb, earring (pair), pendant
Tableware	Tableware made in whole or in part from ivory, e.g. cups, cutlery, chopsticks (pair), plates
Raw ivory	Unprocessed ivory pieces, tip of a tusk or a whole tusk
Smoking accessories	Cigarette holders and smoking pipes made in whole or in part from ivory
Statue	Statue made entirely of ivory
Miscellaneous items	Other ivory products that do not belong to any category above. For example: stamps, pens, compasses, etc.

Prices

In the two rounds of surveys, prices were recorded at 113 unique outlets for 747 ivory items (7% of all total items) in three currencies: VND, CNY, and USD. VND was the most commonly quoted currency followed by CNY and USD (Table 11). Some of the items were quoted by weight (n=31), while all others were quoted per item/pair. One outlet (located in Ha Long) switched from quoting in CNY in Survey 1 to VND in Survey 2.

During Survey 1, prices were quoted for 586 ivory items (out of 6,203) in three currencies: CNY (208 items), USD (19 items), and VND (359 items). Among them, 31 were jewellery items (bangles, pendants, bracelets, and necklaces) found at a single outlet and quoted by weight at USD14/gramme. The other 555 items were quoted per item/pair. During Survey 2, USD and VND were the only currencies quoted for 178 ivory items (out of 2,911). All items in Survey 2 were quoted per item/pair.

Table 11. Currencies recorded during Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017) by location

Location	Currency		
	CNY	USD	VND
Ban Don	–	–	Yes
Buon Ma Thuot	–	–	Yes
Da Nang	–	–	Yes
Ha Long	Yes	–	Yes
Ha Noi	Yes	Yes	Yes
Hai Phong	–	–	Yes
HCMC	–	Yes	Yes
Hoi An	–	Yes	Yes
Lak	–	–	Yes
Mong Cai	Yes	–	Yes
Nha Trang	–	–	Yes
Nhi Khe	Yes	–	Yes
Vinh	–	–	Yes

*Key: Currency used = Yes; Currency not used = –

MARKET SURVEY I

Nov 2016–Mar 2017



MARKET SURVEY II

May 2017–June 2017



Of the prices quoted for jewellery, miscellaneous items, raw ivory, and statues during Survey 1, the highest price for a single item was found for an ivory bangle at USD2,637. This bangle was about 2 cm in width and was found at a jewellery outlet in HCMC. During Survey 2, only jewellery prices were reported, ranging from USD6.59 (a pair of earrings) to USD1,420 (an ivory beaded necklace with an ivory pendant). The value of all items for which prices were quoted in Survey 1 totalled USD91,749 and USD19,187 in Survey 2. The significantly smaller total in Survey 2 can be explained by the fact that prices were quoted for only 178 items compared with 538 in Survey 1. Table 12 shows the recorded price range per item/pair of ivory items for sale during Survey 1 and Survey 2.

Table 12. Price range of ivory items recorded for sale during Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017)

Category Sub-category	Survey 1		Survey 2	
	Number of items	Price range (USD)	Number of items	Price range (USD)
Jewellery				
Bangle	54	24–2,637	6	35–132
Bracelet	23	35–659	4	40
Comb	1	154	2	154
Earring (pair)	49	8–124	2	7–35
Necklace	20	40–1,420	1	1,420
Pendant	248	20–1,758	85	22–1,300
Ring	113	11–254	78	9–88
Miscellaneous items				
Pen	4	66–245	n/a	n/a
Stamp	2	435	n/a	n/a
Raw ivory				
Piece	1	308	n/a	n/a
Statue	23	395–1,099	n/a	n/a
TOTAL	538	8–2,637	178	7–1,420

Range of ivory items displayed for sale

The most common range of items openly displayed for sale was 1–5 items per outlet with almost half of the outlets selling ivory (47%) displaying a maximum of five ivory items (Table 13). 91% of all outlets surveyed were offering 50 items or fewer while 9% of the physical outlets were recorded displaying more than 50 items. However, the number of ivory items offered per outlet in Ban Don and Lak was significantly higher than in other locations. In Ban Don, 75% of the outlets were offering more than 50 items during both surveys (n=6). Similarly, in Lak 50% of the outlets were offering more than 50 items during both surveys (n=1). Details on the range of items displayed in Survey 1, Survey 2 and the Online Survey can be found in Annex 3. Due to the readiness with which sellers brought out additional items in three instances in Buon Ma Thuot and Nhi Khe, it is generally assumed that more stock is available but not displayed and that displayed items may be used to entice initial interest from buyers. In addition, in 10 instances in HCMC, sellers confirmed that ivory items not currently visible or available in the outlet could be ordered and customised.

Table 13. Maximum number of items recorded per outlet during Survey 1 (November 2016–March 2017) and Survey 2 (May–June 2017) by range

Range in number of items per unique outlet	No. of unique outlets	% of total
1–5	138	47%
6–25	88	30%
26–50	40	14%
>50	26	9%
TOTAL	292	

Legality and origin of items

Fifteen sellers were asked and answered some, or all, of the semi-structured interview questions about their awareness of illegality:

- The illegality of selling ivory;
- The possibility of sending ivory items to buyers abroad; and
- The possibility of buyers themselves transporting purchased items from Viet Nam to other countries.

Although sellers at the same 15 outlets were questioned in Survey 1 and Survey 2, none of the sellers queried answered in Survey 2 (they ignored the first query and the researcher did not ask any further questions).

Illegality of selling ivory

In Survey 1, five of the 15 sellers said that it is illegal to sell ivory, while one seller said that it is illegal to sell raw ivory (but not carved ivory). Of the five sellers in Survey 1 who admitted that selling ivory is illegal, two were still selling ivory in Survey 2. The other three outlets were closed. However, a seller at Buon Ma Thuot Airport (where ivory was observed during Survey 1 but not during Survey 2), stated that ivory is no longer sold because it is illegal. The seller then voluntarily informed the researchers that they could still find ivory at the gold shops in Buon Ma Thuot City.

Perception of legality

In HCMC, three outlets in Survey 1 and two outlets in Survey 2 were offering ivory for sale accompanied by “certificates of authenticity” seemingly from a company named SJC Gold and Gem Identification Company, part of a reputable jewellery company in Viet Nam. Researchers later confirmed with SJC that the company does in fact authenticate ivory as real ivory. However, researchers could not confirm whether the certificates observed by researchers during the survey were real. The use of similar certificates to prove the authenticity of ivory on sale has also been recorded in other ivory surveys (Vigne and Martin, 2016; Indraswari *et al.*, in prep.). In 2000, shop owners provided what appeared to be official government receipts that authenticated the ivory for sale (Anon. 2002). Whether legitimate or not, the tactic of using certificates and receipts to accompany ivory sales likely targets the mindset of the consumer, leading them to believe that at least in some instances the trade is legal.

Sending ivory items to buyers abroad

Three sellers said that they refuse to send ivory items overseas due to the illegality of this action while two agreed to send items abroad, specifically to China, without stating whether it was legal or not.

Transporting purchased items

Of the nine sellers who confirmed that buyers could transport the ivory to other countries themselves, four suggested that, for quantities of less than 10 ivory items, buyers can take them overseas by wearing them on their body as jewellery. Hiding the items in checked luggage or in pockets was also mentioned. One seller mentioned that only carved ivory could be taken to other countries. One seller was unsure about transporting ivory.

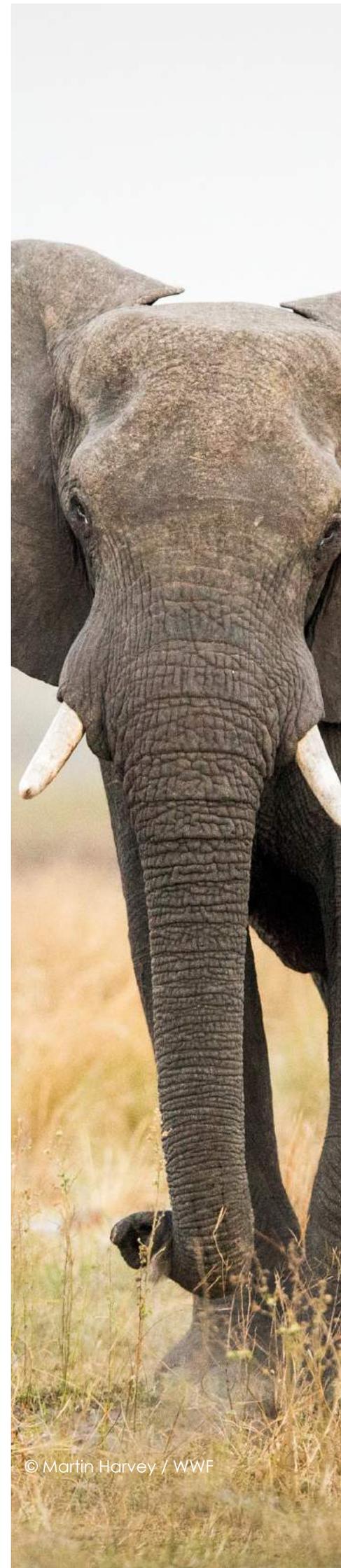
Six sellers specifically mentioned that ivory items could be taken by buyers across the border to China. Two sellers agreed to send ivory items from Viet Nam to buyers in China, one of which specifically mentioned sending items through the northern province of Quang Ninh (the main gateway being the city of Mong Cai, which borders China), while the other one, despite being aware of the illegality of selling ivory, still offered to send ivory to buyer by post to Pingxiang, China.

Origin

During Survey 1, the sellers in the 15 outlets reported the origin of their ivory items as the following countries: Viet Nam (8), unidentified countries in Africa (6), and Thailand (2). The country of origin reported by the sellers was taken at face value and not cross-examined in any way by the researchers. In 2000, traders reported that raw ivory was sourced from within Viet Nam and imported from Lao People's Democratic Republic (PDR), Cambodia, and post-Soviet States (Anon., 2002). In a 2002 report by Martin and Stiles, Viet Nam (particularly Buon Ma Thuot) was mentioned as a source of raw ivory, along with Lao PDR and Cambodia. In 2008, six years later, Stiles (2008) reported that raw ivory for sale in Viet Nam was said to originate almost exclusively from Lao PDR, with small amounts coming from Viet Nam and Cambodia. More recently, a study by Vigne and Martin (2016) claims that nearly all elephant ivory seized in Viet Nam originated from African range States.

Buyers

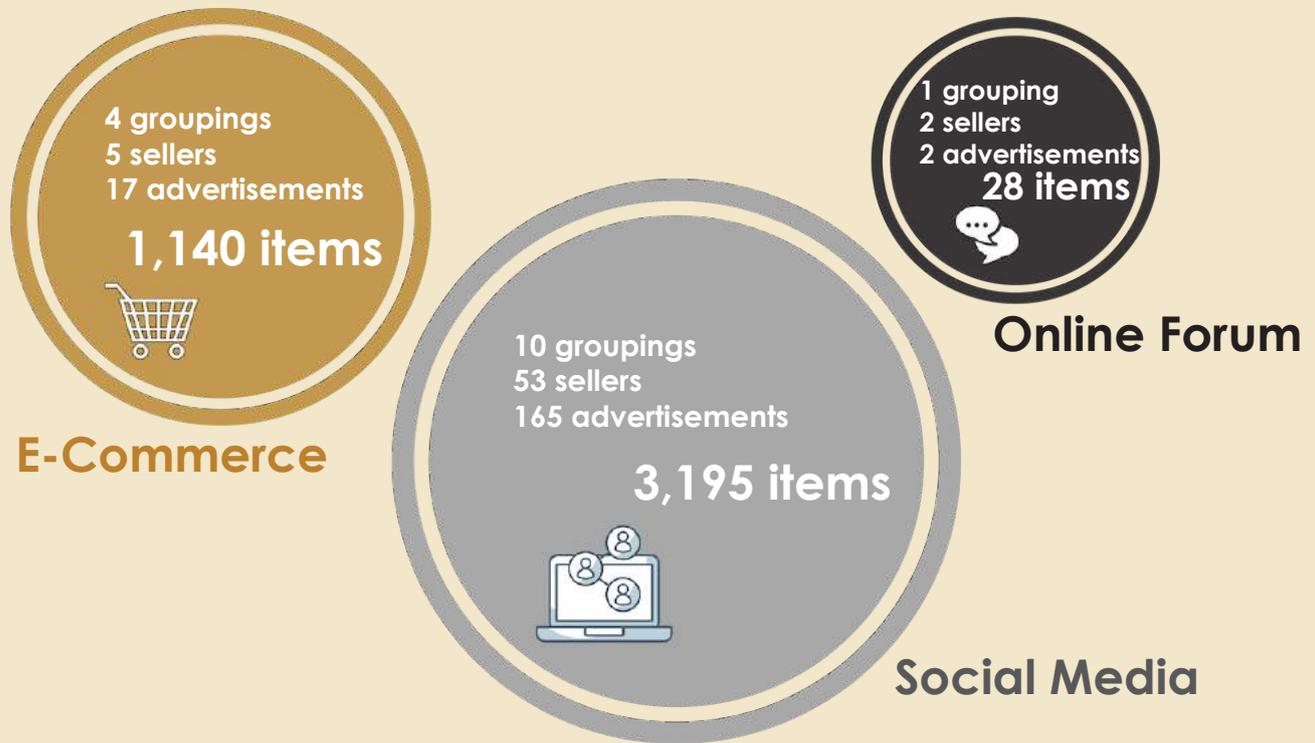
During Survey 1, 13 sellers identified Chinese, Korean, and Vietnamese nationals as buyers in Ha Long, Ha Noi, Mong Cai, and Nhi Khe.



© Martin Harvey / WWF

2.2 Online Market Survey

Figure 6. Overview of online market availability of ivory found in the Online Survey (March–April 2017)



Advertisements/posts offering ivory were found on all three platforms surveyed: social media websites, e-commerce websites, and online forums. A total of 4,363 ivory items were recorded in 15 groupings (i.e. individual accounts, groups, websites, and forums) across seven platforms over a one-month period. These items originated from 184 advertisements/posts and were known to involve a minimum of 60 unique sellers (Figure 6; Table 14). In some instances, comments posted on the advertisements/posts requested information on the availability of ivory items above and beyond those listed or shown in the advertisements, demonstrating buyer interest in items above and beyond those specifically offered for sale.

Platforms and sites

78% (n=144) of all advertisements and posts and 70% (n=3,070) of the total recorded ivory items were found on Social Media Website 1. The number of advertisements/posts for ivory recorded on other sites was relatively low. It is noteworthy that E-Commerce Website 3 accounted for only 2% (n=4) of all advertisements/posts but had the second highest number of ivory items, 24% (n=1,035). This was due in large part to a single advertisement offering 1,000 ivory pendants.

Findings of the Online Survey and previous surveys conducted by TRAFFIC in 2016 (Nguyen and Willemsen, 2016; Indraswari *et al.*, in prep.) demonstrate the continued presence of ivory market availability on all three online platforms: social media websites, e-commerce websites, and online forums. On Social Media Website 1, three groups and five sellers that offered ivory for sale in 2016 were also recorded offering ivory for sale in 2017. Furthermore, two e-commerce websites (E-Commerce Website 3 and E-Commerce Website 4) and one online forum (Online Forum 1), that had ivory advertised in 2016, continued to advertise ivory in 2017.

Table 14. Number of online advertisements/posts selling ivory and number of ivory items for sale observed during the Online Survey (January–April 2017) by online platforms

Online platform	No. of Ads/ Posts	No. of Items
Social Media		
SM1	144	3,070
SM2	21	125
Sub-total	165	3,195
E-commerce websites (EW)		
EW1	1	1
EW2	1	2
EW3	4	1,035
EW4	11	102
Sub-total	17	1,140
Online forums (OF)		
OF1	2	28
Sub-total	2	28
TOTAL	184	4,363

Ivory items observed for sale online

Online advertisements/posts included all ivory product types covered under this survey and described in Table 12, the majority of which consisted of jewellery items (97% of all advertisements/posts). A detailed list of the ivory items found for sale online can be found in Annex 3. Fifteen of the advertisements on two e-commerce groupings listed Viet Nam as the source country for the ivory advertised. Three advertisements mentioned Cambodia and Thailand as countries of origin as well as Viet Nam.

Jewellery was also the most common ivory item recorded for sale in the physical surveys. Items belonging to this category accounted for more than 90% of the total recorded items in each physical survey (Annex 3) and 95% (n=12,846) of the maximum total number of items found.

Prices

Fixed prices were recorded in VND for 30% of the items observed for sale online (n=1,307) (Table 15). Items with fixed prices were found on both social media websites and three e-commerce websites (E-Commerce Websites 1, 3 and 4). The lowest price recorded was for ivory earrings at USD7 per pair found on Social Media Website 1, while the highest price was for an ivory pendant at USD285 on Online Forum 1. The value of all items for which prices were quoted in the Online Survey totalled USD3,537.

Five ivory items were being sold through bidding in which the sellers set a starting price and minimum bidding increments. The starting price for four jewellery items (necklace, ring, bracelet, and pendant) was USD0 while the fifth item, an ivory carving started at USD3. The minimum bidding increments varied from unrestricted to USD2.

Table 15. Number and price range of ivory items for sale during the Online Survey (January–April 2017) with a fixed price

Category	Number of items	Price range (USD)*
Jewellery		
Bangle	20	22–242
Bracelet	16	22–79
Earring (pair)	59	7–66
Pendant	1,075	12–285
Ring	126	9–176
Miscellaneous items		
Pen	10	132
Smoking Accessories		
Cigarette holder	1	61
TOTAL	1,307	7–285

*Does not include ivory items offered for sale at auction

Sellers

The 60 sellers found selling ivory online consisted of 47 online stores, five online portals advertising items online, and eight uncategorised sellers (Table 16). The five online sellers categorised as online portals were found operating on either social media or e-commerce websites. During the physical surveys, three sellers voluntarily mentioned that they also sell ivory online via social media (Facebook, Zalo, and WeChat). In total, eight sellers were found to be using both physical and online market channels to sell ivory across all surveys.

Table 16. Categories of Online Sellers identified during the Online Survey (January–April 2017)

Category of Online Sellers	Number of Online Sellers	Definition of Terms
Online store	47	A seller operating solely or predominantly as an online business, including e-commerce websites, online forums, and social media accounts
Online portal	5	An online portal of a physical outlet associated directly with the physical outlet by means of the corresponding outlets' physical address, name or otherwise
Uncategorised seller	8	A seller that could not be determined whether it was an online store, a physical store with online sales or an individual selling items within their personal possession
TOTAL	60	

The majority of the sellers (52) publicly shared information that associated them with different cities and provinces in Viet Nam, only eight did not. The geographical information provided by the online sellers varied greatly in terms of specificity and, in some instances, was only at the provincial level. One third of the sellers (20 sellers out of 60) were associated with Buon Ma Thuot (Table 17). Locations associated with all three surveys included Buon Ma Thuot, Da Nang, Ha Noi, and HCMC.

Table 17. Geographical association of online sellers and number of ivory items found during the Online Survey (January–April 2017)

Location	No. of sellers	No. of items
City		
Buon Ma Thuot	20	1,816
Da Nang	1	15
Ha Noi	7	1,088
HCMC	15	553
My Tho	1	1
Pleiku	3	205
Phan Rang	1	45
Province		
Binh Dinh	1	3
Quang Nam	1	407
Quang Ngai	1	3
Son La	1	1
TOTAL	60	4,363

Range of ivory items for sale

Similar to the physical surveys, offering 1–5 items per advertisement/post was the most common numerical range of items found in the Online Survey, accounting for 54% of all online advertisements/posts for ivory (Table 18). Less than 9% of the online advertisements/posts were offering more than 50 items. Details on the numerical range of items found in Survey 1, Survey 2, and the Online Survey can be found in Annex 4.

Table 18. Numerical range of items recorded per advertisement/post by range during the Online Survey (January–April 2017)

Range of no. of items per ad/post	No. of ads/posts	% of total
1–5	100	54%
6–25	57	31%
26–50	10	5%
>50	17	9%
TOTAL	184	

Contact and payment methods

Contact via phone was the most common method of communication used by sellers, noted in 63 advertisements/posts. This was followed by Facebook Messenger (18 posts) and Zalo (16 posts). Some sellers were available via multiple contact methods including phone, Facebook Messenger, Zalo, Viber, and SMS. Both Zalo and Viber are smartphone applications that can be used for messaging and calling.

Six sellers specified bank transfer as the payment method and one accepted cash on delivery. Other sellers did not specify a payment method. None of the advertisements/posts made any mention of the legality.



Ivory pendants for sale in Mong Cai, Viet Nam © TRAFFIC

DISCUSSION

3.1 Ongoing Illicit Ivory Market

The monitoring of the physical ivory market in Viet Nam over the last 27 years by different researchers has demonstrated a persistent market availability (see Introduction; Annex 1). The research undertaken for this report confirmed the continued presence of ivory in 19 locations in which it had been found before on one or more occasions (see Table 3).

Within this study's research period alone, a total of 93 outlets selling ivory in Survey 1 were still selling ivory when re-surveyed in Survey 2. Further, 13 outlets found selling ivory in this research may have been selling ivory since last surveyed in 2014 (Nguyen and Willemsen, 2015). These findings show that some outlets may regularly offer ivory. However, there are others that may be offering ivory irregularly. Between Survey 1 and Survey 2, 199 outlets had closed, started, or stopped selling ivory. Thus, even if ivory markets persist in cities or villages, the unique outlets offering ivory may change readily.

One of the aims of conducting these physical market surveys within shorter timeframes than past surveys was to observe dynamic changes such as these that may be missed if surveys only take place on an annual or biennial basis. It is also worthy of note that the absence of ivory at an outlet during one point in time (one day, one survey) could be very temporary. For example, a new shipment of ivory could arrive the next day but would not be recorded by researchers. Thus, the repeated visits of this survey provide a more reliable indication of the availability of ivory than one-off surveys.

Awareness of illegality

Ivory is still being sold in Viet Nam even though sellers are aware of the illegality of its sale. A TRAFFIC survey conducted in 2000 reported that both traders and elephant hunters in Viet Nam were aware that they were violating the law but continued to do so (Anon, 2002). In 2015, Liu found evidence that both buyers and sellers in Viet Nam were aware of the illegality of the ivory trade (Liu, 2015). Yet, much like the findings here, instead of ceasing the illicit activity, buyers were taking evasive manoeuvres and sellers seemed to have accepted

the possibility of their ivory being seized as simply a cost of doing business (Liu, 2015). Different methods are used by sellers to avoid detection: i.e. not storing the products on the premises, only displaying fake ivory openly and storing genuine ivory unseen elsewhere, and only displaying ivory jewellery which consisted of large wooden beads and smaller ivory beads.

Sellers were well-versed in ways that buyers could transport ivory from Viet Nam to other countries without detection, despite it being illegal. They provided clear advice and information to researchers on how buyers could transport the ivory items avoiding detection or offered to send them by mail.

Origin of ivory items

Eight physical outlets (in Survey 1) and 15 online advertisements reported Viet Nam as the source country of the ivory items for sale. However, this is unlikely given that, as reported by Vietnamnet.vn (2016b), the wild populations of elephants in Viet Nam have seen a 95% decrease over the last 40 years according to the Viet Nam Administration of Forestry (VNForest). The main threats facing these animals include habitat loss, poaching for ivory and the capture of wild elephants for domestic uses (WWF, 2015a). In 2015, WWF estimated that the number of wild elephants in Viet Nam was less than 100 individuals (WWF, 2015b). In fact, it remains unclear how much longer Viet Nam will be considered a range State for Asian Elephants, much less a source of ivory for the growing Vietnamese market.

The fact that the large volume of ivory confiscated in Viet Nam (Table 2) over the last few years has arrived from African range States also clearly illustrates that there is a potentially large supply of African ivory entering the market in Viet Nam. It is assumed that ivory found on the market is more likely to be from African specimens than Vietnamese or Southeast Asian elephants. It is also possible, albeit unlikely, that a nominal number of items on the market today are from pre-1992, thus falling into the legal grey area. However, there are no known data concerning the registration of ivory stockpiles in Viet Nam, making it impossible to measure existing or depleted stockpiles from that time, or any insights into the relative security of seized ivory stocks.

"In one instance, the amount of ivory observed in the physical market corresponded with the high and low tourist seasons for Chinese tourists."



Chinese characters advertising ivory on a billboard in Ha Long, Viet Nam © TRAFFIC

3.2 Fluidity of the ivory market

The results of the surveys indicate the fluctuations in both the physical and online ivory markets in Viet Nam. Indicators of the fluidity of the physical market include changes in the specific outlets selling ivory, the presence of ivory, and the quantity of ivory found.

One notable indicator of market fluidity was the availability of ivory in two locations where it had not been previously recorded by earlier surveys: Da Nang and Vinh (see Annex 1). Two previous surveys conducted by TRAFFIC in 2000 and 2014 (Anon., 2002; Nguyen & Willemsen, 2015) did not find ivory in these locations. However, when surveyed in 2016–2017, the same three unique outlets were selling ivory in each city during both Survey 1 and Survey 2, while the other unique outlets offering ivory in these cities changed from Survey 1 to Survey 2. Even though the survey efforts in 2000, 2014, and 2016–2017 are not directly comparable, the newly recorded ivory sellers in these locations show that ivory markets can emerge in the span of two–three years.

3.3 Is the ivory market linked to tourism?

The analysis of the physical market data indicated possible links to tourism in four locations: Ha Long, Ban Don, Lak, and Nhi Khe. Indicators included: the presence of ivory items at souvenir/handicraft outlets, advertisements in languages other than Vietnamese, prices quoted in currency other than VND, and the availability and quantity of ivory items correlating with known tourist seasons.

Ha Long

Ha Long is the capital city of Quang Ninh Province, a province in northern Viet Nam bordering China. The city lies along the shores of Ha Long Bay, a World Heritage Site, and one of the most popular tourist attractions in Viet Nam. Ha Long welcomed more than 4.3 million visitors in the first six months of 2017 alone (Quang Ninh Newspaper, 2017). Ha Long was chosen as a location for this survey both because it had been previously surveyed (Stiles, 2008; Nguyen and Willemsen, 2015) and for its role as a favoured tourist location. In fact, all but one of the outlets found selling ivory in Ha Long were souvenir outlets located on a popular tourist street.

Other strong links to tourism found only in Ha Long were seller reports mentioning China and Chinese buyers, Chinese-language advertisements for ivory, and ivory prices quoted in Chinese currency. Three sellers in Ha Long reported their buyers to be Chinese nationals, which was also found in the 2014 survey by TRAFFIC (Nguyen and Willemsen, 2015). Three sellers in Ha Long also specifically mentioned ways buyers could transport ivory items to China. In Ha Long, researchers observed outlets





displaying the Chinese characters for ivory (象牙) on their billboards without translation into Vietnamese or other languages. It follows logically that the aim of advertising in this manner was to target only Chinese-reading customers. On one occasion, researchers also encountered an outlet in Ha Long that quoted ivory prices in CNY. In 2014, TRAFFIC also recorded ivory items in Ha Long quoted in CNY (Nguyen and Willemsen, 2015).

During the analysis of the data, a possible correlation between the ivory market and the Chinese tourist seasons became apparent. The local Tourism Promotion Information Center notes the winter months (October–April) as the high season for Chinese tourists and the summer as the low season (May–September) (Quang Ninh Tourism Promotion Information Center, pers. comm., September 2017). In Ha Long, the same 33 outlets were surveyed during both surveys, but the percentage of outlets selling ivory declined from 27% to 6% and the quantity of ivory for sale decreased by 87.9% in Survey 2. Nine of the surveyed outlets in Ha Long were selling a combined total of 156 ivory items during Survey 1. When the same outlets were re-surveyed during Survey 2 in May 2017, only three outlets were selling a total of 21 ivory items. The ivory market availability was much lower in May than it was in December—both in terms of outlets selling ivory and the quantity of ivory. It remains to be seen whether the decrease in the open sale of ivory observed in Survey 2 was seasonal or permanent.

Mong Cai

Mong Cai is a city in Quang Ninh Province and sits on the border with the Chinese city of Dongxing. Mong Cai is known as a “shopping heaven” and trade centre in the north-eastern region of Viet Nam (vietnam.vnanet.vn, 2015). The city is also a gateway for Chinese tourists entering Quang Ninh Province. In 2016, 1.6 million Chinese tourists entered the province through the Mong Cai border gate (vietnamnet.vn, 2017). In 2016, researchers became aware of special tours catering only to Chinese tourists visiting Mong Cai to patronise specific shopping centres (baodatviet.vn, 2016). The tours were free for Chinese nationals with the tour operators receiving revenue through commissions from the shopping centres in exchange for bringing their tours there. Vietnamese nationals were not allowed inside these shopping centres (thanhnien.vn, 2017).

During Survey 1 in December 2016, researchers observed ivory for sale in one of the said shopping centres. In April 2017, shortly before Survey 2, the tourism authority of Quang Ninh Province called for the closure of these types of shopping centres (anninhthudo.vn, 2017). Indeed, in May 2017, when the researchers returned to the same shopping centre during Survey 2, it was closed. However, according to news reports, as of July 2017 these types of specialised tours are once again active in Mong Cai (tienphong.vn, 2017). The phenomenon of these specialised tours has not been noted in earlier surveys but is an aspect of tourism linked to Viet Nam’s ivory markets that should continue to be monitored as it may appear in other cities and provinces.

Villages

The surveys included three villages: Ban Don, Lak, and Nhi Khe. The outlets in these villages were exclusively souvenir (Ban Don, Lak) or handicraft (Nhi Khe) outlets. Interestingly, these three villages also played a disproportionate role in the volume of ivory found in the surveys. Combined, the three villages represented a very small percentage of the individual outlets selling ivory in the surveys (5%) but represented a large percentage of the overall quantity of ivory items recorded (19%).

Ban Don and Lak are two tourist sites located in the Central Highland Province of Dak Lak. All 19 of the surveyed outlets in Ban Don and Lak were souvenir outlets and ivory was

found at 11 of them (Annex 1). Ban Don sits on the edge of Yok Don National Park, which is Viet Nam's largest nature reserve and one of the country's most famous national parks (vietnamnet.vn, 2016a). Many tours to the park also include a stop in Ban Don village. Lak sits on the edge of a lake with the same name. Lak Lake is the second-largest freshwater lake in Viet Nam and is considered one of the most beautiful lakes in the country (vnexpress.net, 2017). Elephant riding is a popular tourist activity in both villages (Zing News, 2016) and researchers observed both Vietnamese and foreign tourists riding elephants there.

Nhi Khe, a suburban village located about 20 km from Ha Noi's city centre, is famous for its traditional wood carving activities. All of the outlets surveyed in Nhi Khe were handicraft outlets, selling wood carvings and, in five cases, selling ivory. The economy in this village is still tied directly to this traditional profession. However, local leaders have also been attempting to increase tourism to the village (kinhtedothi.vn, 2016) and various tour companies based out of Hanoi offer tours to Nhi Khe.

Apart from the five outlets selling ivory in Nhi Khe, no direct ties to tourism were observed. However, a previous ivory survey (Vigne and Martine, 2016) and a previous investigation (Liu, 2015) found that Chinese tourists are the main consumers of ivory in Nhi Khe based on the fact that vendors have learned to speak Mandarin, signs and billboards advertising ivory are in Chinese, and sellers themselves report that Chinese tourists are their main (if not exclusive) buyers. Nhi Khe was also the main location under scrutiny in the Wildlife Justice Commission report (2016) which revealed extensive carving and illegal trade activities in the village.

3.4 Physical markets and online markets: comparisons and links

The physical and online markets are similar in the range and number of ivory items for sale and the categories of items for sale. A key difference between the two markets was the price of the items. There was also evidence of links between both markets.

Similarities

Locations

Four locations were found to have links to both the physical and online ivory markets: Buon Ma Thuot, Da Nang, Ha Noi, and HCMC. These locations were where ivory was found for sale in physical outlets and with which online ivory sellers were associated by means of their profile information and/or geo-tags (Table 19). Other locations only emerged in one survey or the other (Figure 5; Table 17). Interestingly, the social media survey by Indraswari *et al.* (in. prep.) also identified online ivory sellers associated with these four locations.

Range of ivory items for sale

Results of both physical and online market surveys demonstrated the prevalence of outlets/advertisements selling one–five items per outlet/advertisement. In the physical outlets, it is possible that sellers favoured displaying a limited number of items to minimise the punishment if caught. For the online advertisements, the popularity of offering such a small range of items may be due to the limitations set on the number of thumbnail photos allowed to accompany each advertisement, which consequently limits the number of items a passive viewer can see (see Methodology – Online Market Survey).

Categories of Items

A possible explanation for the popularity of jewellery items across all three surveys is that such products tend to be smaller in size which makes them easier to store, carry, transport, or deliver, making them a popular item for buyers in both physical and online markets. This

is further supported by the fact that jewellery items were mentioned by all sellers who said they could send ivory items to buyers abroad or that buyers themselves could transport the items to other countries. Liu (2015) found that some buyers seek only small ivory items, such as bracelets, and necklaces, because they are less risky to transport. In addition, the smaller size of the jewellery items commands a lower price in comparison with other categories (such as statues), making it more affordable for buyers.

Table 19. Number of outlets/sellers by location/geographical association common to both the physical and online ivory markets

Location/ Geographical Association	No. of unique physical outlets	No. of online sellers
Buon Ma Thuot	23	20
Da Nang	8	1
Ha Noi	163	7
HCMC	43	15

Differences

The main difference between the online and physical market was the price range for comparable items (Table 20). The physical market recorded larger price ranges for all sub-categories of ivory items; the lowest prices being similar to the online markets, but the highest prices being five to 10 times as much. For example, the cheapest bangle recorded for sale online was 0.8 cm thick and priced at USD22. Meanwhile, a bangle of the same approximate size and thickness was found for sale in a physical outlet but was priced at USD35. In fact, even thinner bangles (0.5 cm) found in a physical outlet were still priced higher (USD24) than the thicker bangle for sale online (USD22).

A potential explanation for the observed price variances is that online sellers may be able to price their items lower because the store itself is virtual and does not incur the overhead costs of a physical location. Much like legal commercial goods, physical outlets in central locations may command higher prices in order to cover the operational costs of the outlet (rent, utilities).

Table 20. Price range of ivory items recorded in Viet Nam in Survey 1 (November 2016–March 2017), Survey 2 (May–June 2017) and the Online Survey (March–April 2017)

Jewellery Sub-Category	Price Range (USD)	
	Physical	Online Survey
Bangle	24–2,637	22–242
Earring (pair)	7–124	7–66
Pendant	20–1,758	12–285
Ring	9–254	9–176

**Only includes sub-categories of jewellery common to both surveys for which a price was recorded*



Ivory in Ha Long, Viet Nam © TRAFFIC



Ivory jewellery for sale in Lak, Viet Nam © TRAFFIC

CONCLUSIONS & RECOMMENDATIONS

The physical and online ivory market in Viet Nam persists, particularly in Ha Noi and HCMC, and on social media websites. The physical market may even be expanding as ivory was found in all locations surveyed, including for the first time in the cities of Da Nang and Vinh. The online sale of ivory continues on social media websites, e-commerce websites, and online forums. The results of the semi-structured interviews undertaken as part of these surveys indicate that, much like in 2015 and earlier, sellers are aware that it is illegal to sell and transport ivory but the ineffective enforcement of the regulations in Viet Nam do not deter sellers from doing so. To date, laws regulating sale of ivory in Viet Nam do not act as strong deterrents for sellers.

The ivory market in Viet Nam, both physical and online, appears to be quite fluid. In the span of eight months, 43% of the outlets observed with ivory either started or stopped offering ivory or closed their doors. In the same timeframe there was high turnover in the online markets, specifically on social media websites, with 86% of the previously surveyed groupings and sellers selling ivory unable to be found or no longer selling and new ones emerging. However, the dynamics of the ivory trade have yet to be fully captured due to the lack of standardised survey methods in the past which has prohibited direct comparisons between surveys.

Evidence linking tourism to ivory sales was observed in Ha Long and in the tourist villages of Ban Don and Lak. The presence of Chinese tourists was recorded in Ha Long, but indicators of Chinese tourists buying ivory in locations noted by previous surveys, such as Nhi Khe, were not observed. Interestingly, the tourist villages represent a disproportionately large volume of the ivory for sale in Viet Nam, especially given that they often have fewer outlets than the larger cities.

Similarities in the market channels were evident. Eight locations were linked to both physical outlets and online sellers. The physical outlets and online sellers were associated with Buon Ma Thuot, Da Nang, Ha Noi, and HCMC. Jewellery was the most common item to sell, with most physical outlets and online advertisements offering fewer than 50 items. Small, inexpensive jewellery items seem to be favoured by buyers and sellers alike for both domestic and international consumers. One difference noted was that the prices on the physical market were slightly higher, and the price range larger, than for similar items on the online market.

This research delivers the following recommendations to eliminate the illicit market of ivory by addressing supply through law enforcement, working with the private sector and reducing demand.



RECOMMENDATIONS

Recommendations for the Vietnamese Government

Increase deterrents against criminal activity:

- Close the legal loopholes relating to the trade in Asian and African elephants and their parts by: 1) amending Decree 32/2006/ND-CP to clarify that it applies inclusively to Asian Elephant *Elephas maximus* parts exploited and used prior to 1992; 2) clarifying that both Asian and African elephants and their parts are equally prohibited from trade in Viet Nam thus closing any loopholes that may be used to launder ivory from one species or the other; and 3) eliminate the 2 kg minimum threshold for the application of the amended Penal Code as the majority of worked ivory products found on the market in this report do not meet that threshold and would thus be exempt from criminal penalties.
- Increase capacity building for law enforcement officers to identify and understand contemporary marketing tactics used to reduce the risk of detection in illegal wildlife trade, such as the open use of Chinese-language advertisements for ivory at physical outlets and the ease of opening new groups on online platforms.
- Adapt and apply existing regulatory frameworks to ensure effective law enforcement against online trading channels, including the development of capacity to detect and combat illegal online trade in ivory products, particularly on social media. The Vietnamese government is encouraged to develop a special law enforcement unit to focus on online ivory trading, given that policing online marketplaces involves a different skillset than that of physical markets.
- Conduct an ivory stockpile inventory, including an assessment of storage facility security, marking, and management of stocks, in accordance with CITES Res. Conf. 10.10 (Rev. CoP17).

Restrict the market availability of ivory:

- Law enforcement agencies should target resources at locations with a high density of outlets selling high volumes of ivory, such as in Ban Don and Ho Chi Minh City, where co-ordination and logistics needs are minimal, but law enforcement efforts would have a high impact. Efforts should also be put towards streamlining the reporting of illegal ivory trade (online or physical markets) to provide current, accessible, and actionable information to law enforcement and the service providers behind the outlets/platforms. In some instances, members of law enforcement and the public can report illegal or questionable advertisements directly through the relevant online platform. Other reporting avenues, such as the Environmental Police Online Reporting Platform, the Education for Nature – Viet Nam phone hotline (18001522), and the mobile application Wildlife Witness can also be used to report both physical and online market availability of wildlife.
- Law enforcement agencies, with assistance from NGOs and cyber security experts, are urged to work with the online sector actively to moderate the illegal selling of ivory and improve reporting mechanisms on their platforms.
- Law enforcement agencies are encouraged to regularly confiscate visible ivory products (and items stored out of sight) in identified locations and continue to re-survey outlets and cities known previously to offer ivory, as markets can easily appear and disappear over short periods of time.



Recommendations to all stakeholders

Stay up to date on market trends:

- Conduct regular physical market surveys using standardised methodology, particularly in areas with known ivory markets and existing or developing domestic and international tourism. Although it is challenging to conduct full-scale market surveys on a regular basis, rapid surveys using standardised methods can be used to continue tracking trends in key markets, to understand buyers, including the role of tourists, and other emerging trade dynamics.
- Conduct regular online market surveys using standardised methodology with a concentration on social media websites and platforms. Conducting online market surveys is less cumbersome than physical market surveys and it is important to continue gathering data to better understand the online ivory market and ivory sellers' use of multiple channels.
- Stay alert to and share with law enforcement agencies any avoidance tactics used by sellers and buyers, such as displaying fake ivory while storing genuine ivory off-display.

Reduce consumer demand:

- Implement consumer market research on the ivory trade to gain an understanding of the motivations and practices of those purchasing ivory in physical and online markets
- Develop and implement social and behaviour change communication campaigns to change the behaviour of consumers purchasing ivory in Viet Nam.
- Robustly evaluate demand reduction efforts by assessing the baseline of reported market availability and changes in motivations and intention to purchase ivory.



Ivory items © TRAFFIC



Ivory items for sale in Ho Chi Minh City, Viet Nam © TRAFFIC

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ANNEX I

Findings from physical surveys conducted in 1990–1991, 2000, 2001, 2008, 2014, 2015, 2016, 2017

Location	1990-1991			2000			2001			2008			2014			2015			2016			2017		
	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces	Outlets Surveyed	Selling Ivory	Total No. of Pieces
An Khe				✓	0																			
Ban Don				✓	0								13	13	828	16	16	703	11	7	792	11	8	534
Buon Ma Thuot				✓	✓								27	7	433	51	29	1965	39	21	1956	39	11	681
Da Lat				✓	✓								75	0	0									
Da Nang				✓	0								111	0	0				46	3	44	46	8	65
Dai Nam													23	0	0									
Do Son				✓	0																			
Ha Long									29	1	3	230	7	53				33	9	174	33	3	21	
Ha Noi	✓	50		✓	✓		157	13	777	227	10	407	103	8	169	218	57	371	137	36	443	94	20	268
Ha Tien									33	4	113	53	3	29										
Hai Phong				✓	✓								42	1	8				37	7	83	37	4	53
Ho Chi Minh City	✓	31		✓	✓		99	37	2262	251	49	1776	277	31	502	505	249	3098	385	132	2276	181	74	1039
Hoi An				✓	0								52	2	15				11	1	3	11	1	3
Hue				✓	✓					59	8	141	106	2	44									
Kon Tum				✓	✓								28	2	39									
Mong Cai																			24	4	60	24	4	38
Nhi Khe																53	53	9893	11	5	132	11	1	1
Mui Ne													32	0	0									
Lak																			8	1	113	8	2	148
M'Drak				✓	0																			
Nha Trang				✓	0					27	0	0	177	3	71				86	8	103	86	8	45
Phan Thiet				✓	0																			
Phu Quoc									26	1	4	70	0	0										
Pleiku				✓	0								42	5	63									
Quy Nhon				✓	0								25	0	0									
Sa Pa													55	0	0									
Tam Ky				✓	0																			
Thanh Hoa													5	0	0									
Thuy Ung																✓	0	0						
Vinh				✓	0								18	0	0				24	3	7	24	4	15
Vung Tau				✓	0		20	0	0	17	0	0	48	0	0									
Unknown 1																✓	0	0						
Unknown 2																✓	0	0						
Unknown 3																4	4	69						
Unknown 4																✓	0	0						
Unknown 5																✓	0	0						
TOTAL	N/A	81	N/A	100	N/A	N/A	276	50	3,039	669	73	2,444	1,612	84	2,254	843	408	16,099	852	237	6,186	605	148	2,911

Sources: 1990–1991 (Martin, 1992); 2000 (Anon. 2002); 2001 (Martin and Stiles, 2002); 2008 (Stiles, 2008); 2014 (Nguyen and Willemsen, 2015); 2015 (Vigne and Martin, 2016); 2016 and 2017 (this report)

Key: ✓ = surveyed but number of outlets unknown/ivory products found for sale but number unknown

*Total number of ivory items reported in Nguyen and Willemsen, 2015 was recounted to reflect the same methodology used in the 2016 and 2017 surveys.

**The figures given here represent survey efforts and findings as reported in publication. Note that the locations of Ban Don, Nhi Khe, and Thuy Ung were assumed based on textual description and five other locations could not be identified (represented as Unknown) for Vigne and Martin, 2016.

ANNEX II

Number of outlets surveyed in Survey 1 and Survey 2, number of outlets selling ivory, and number of ivory items found, by location

Location	Survey 1				Survey 2			
	No. Outlets Surveyed	No. Outlets Selling Ivory	% of Outlets Selling Ivory	Total No. of Ivory Items Found	No. Outlets Surveyed	No. Outlets Selling Ivory	% of Outlets Selling Ivory	Total No. of Ivory Items Found
Cities								
Buon Ma Thuot	39	21	54	1,956	39	11	28	681
Da Nang	46	3	7	44	46	8	17	65
Ha Long	33	9	27	174	33	3	9	21
Ha Noi	137	36	26	443	94	20	21	268
Hai Phong	37	7	19	83	37	4	11	53
HCMC	385	132	34	2,276	181	74	41	1,039
Hoi An	11	1	9	3	11	1	9	3
Mong Cai	24	4	17	60	24	4	17	38
Nha Trang	86	8	9	103	86	8	9	45
Vinh	24	3	13	7	24	4	17	15
Sub-total	822	224		5,149	575	137		2,228
Villages								
Ban Don	11	7	64	792	11	8	73	534
Lak	8	1	13	113	8	2	25	148
Nhi Khe	11	5	45	132	11	1	9	1
Sub-total	30	13		1,037	30	11		683
TOTAL	852	237		6,186	605	148		2,911

ANNEX III

Total number of ivory items by category recorded during the Survey 1, Survey 2 and the Online Survey

Category Sub-category	Number of items		
	Survey 1	Survey 2	Online Survey
Bead	79	28	25
Decorative items	23	5	14
Jewellery			
Bangle	716	335	641
Bracelet	183	114	95
Comb	1	2	3
Earring (pair)	367	122	65
Necklace	112	36	69
Pendant	2,438	1,399	1,586
Ring	1,963	771	1,761
Hairpin	51	5	
Brooch	1		
Glasses	10		
Miscellaneous items			
Pen	16	3	16
Stamp	8	7	
Bottle cap	1		
Chess pieces	16		
Clock	1		
Compass	1		
Container	3		
Raw Ivory			
Piece	13	14	4
Tip	1		
Tusk	1		
Smoking Accessories			
Cigarette holder	1	12	23
Smoking pipe	10	7	1
Statue	145	50	54
Tableware			
Chopsticks (pair)	4	1	
Cup	2		5
Cutlery handle	7		
Plate	12		
Fork			1
TOTAL	6,186	2,911	4,363

ANNEX IV

Number of items by range in physical and online markets

Range of no. of items per outlet/ ad	Survey 1		Survey 2		Online Survey	
	No. of outlets	% of total	No. of outlets	% of total	No. of ads/posts	% of total
1-5	111	43%	72	49%	100	54%
6-25	72	28%	42	28%	57	31%
26-50	31	12%	21	14%	10	5%
51-75	23	9%	5	3%	5	3%
76-100	4	2%	2	1%	1	1%
101-125	5	2%	3	2%	6	3%
126-150	5	2%	0	0%	1	1%
>150	7	3%	3	2%	4	2%
TOTAL	258		148		184	

TRAFFIC, the wildlife trade monitoring network, 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.

For further information contact:
TRAFFIC
Viet Nam Office
No 1, Lane 95, Giang Van Minh Street,
Ba Dinh District, Ha Noi, Viet Nam

Telephone: +44 (0)1223 277427
E-mail: traffic@traffic.org
Website: www.traffic.org

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