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**OUR FORMAL CONSULTATION STATEMENT TO THE DIRECTORATE-GENERAL FOR
ENVIRONMENT OF THE EUROPEAN COMMISSION TO CLOSE THE DOMESTIC IVORY
MARKETS AND TO BAN THE IMPORT AND EXPORT OF ALL RAW AND WORKED IVORY
ITEMS IN THE EUROPEAN UNION WITH LIMITED EXCEPTIONS,
GIVEN ON 8 DECEMBER 2017 IN BRUSSELS**

Tusk Task Force is the wildlife conservation non-profit NGO with its global HQ in Seattle, USA with Transparency Registry No. 056368329093-73 in the European Union. We have over 3,000+ stakeholders (supporters, partners, and donors) worldwide, including hundreds all over Europe. Our mission is to abolish all wildlife exploitation, terrorism, and violence worldwide by providing strategic and tactical resources—advocacy, intelligence, and protection—to all stakeholders that defend them so that wildlife may live.

We join a consortium of many organizations and individuals worldwide, concerned about the global consequences of wildlife trafficking, and today, on their behalf, we strongly urge the European Commission to close the domestic ivory markets and to ban the import and export of all raw and worked ivory items in the European Union with limited exceptions.

As the Commission already knows, legal domestic markets of ivory, including within the EU, encourages illegal trade by serving as a cover for trade in illicit ivory.¹ As such, ivory remains on sale in many EU countries in markets, auctions, antique shops and online which contributes to the surge² in African (*Loxodonta Africana*) and Asian (*Elephas maximus*) elephant poaching and ivory trafficking—driven by the continued growing demand from Asia.³

We believe that the continued domestic market of ivory in the EU is unethical from a governance and moral standpoint, as highlighted by the following:

- African Savanna elephant populations declined by 30 percent (equal to 144,000 elephants) across 18 countries in Africa from 2007 to 2014, according to the Great Elephant Census⁴ published last year, which put their remaining numbers at just over 350,000.
- The current rate of decline is 8 percent per year, primarily due to poaching, driven by the demand from Asia. For a specific example highlighting the profound impact of wildlife trafficking, the elephant population declined 6 percent overall in Zimbabwe but dropped by 74 percent within one specific region, according to the census.

¹ *The Re-Export of Pre-Convention/Antique Ivory from the European Union*. Report prepared for the European Commission by Victoria Mundy, August 2014.

² *Commission Staff Working Document: Analysis and Evidence in support of the EU Action Plan against Wildlife Trafficking*. Brussels, 26.2.2016

³ Commission Notice, Guidance Document: EU regime governing intra-EU trade and re-export of ivory. *Office Journal of the European Union*, c 154/4, 175.5.2017

⁴ Chase et al. (2016), *Continent-wide survey reveals massive decline in African savannah elephants*. PeerJ 4:e2354; DOI 10.7717/peerj.2354

- Increase of elephant poaching has also been reported in wildlife areas located in India⁵ and other Sub-Asian countries as the demand for ivory is projected to increase.
- Statistics suggest an African elephant is killed every 20 minutes by highly professional criminal networks who smuggle the contraband ivory where it continues to fetch a price of €593 (\$700 USD) per kilo.⁶
- The EU is the biggest exporter of ivory to China and Hong Kong, with exports of worked ivory experiencing an alarming increase in the last two years. Moreover, huge shipments have been seized in EU Member States recently and ivory is on top of the list of seized wildlife products in the EU.⁷
- Beyond its impact on elephants and their benefits to biodiversity,⁸ the bloody ivory trade has also been tied to corruption, organised crime, the murder of wildlife rangers in Africa creating instability in governance, increasing corruption, exacerbating poverty, and destabilizing migration and border controls.⁹
- Many EU member states has reported an increase of seizures of around 4,500 ivory items destined for the Asian markets, particularly in China, Hong Kong, and Vietnam. Ivory products are moved through EU ports, airports, and increasingly, mail centres across the EEC zone.¹⁰
- The report also concluded that there is an increased of buyers using forged pre-CITES certificates to re-export, making it difficult to distinguish legal pre-CITES or worked ivory from illegal ones for which export is banned. Logic dictates that this may also reflect a growing trade of illegal ivory trafficking parallel to legal ivory trafficking.¹¹

Please allow us to highlight our argument from a big picture standpoint, as well.

The European Union was created as an economic bloc “to ensure future peace and an absence of conflict” for a more prosperous Europe and beyond so it is fitting that the EU must take an urgent leadership role in abolishing the bloody ivory trade which exacerbates conflicts and violence around the world—from Africa to Asia, and back. It is imperative that the EU must take complete responsibility, once and for all, to end its own role in the bloody ivory trade. By doing so, it will also free up resources to combat wildlife trafficking abroad.

While the African Union has started implementing a continent-wide strategy to close the ivory market there, so too must Europe. Indeed, some member states—the Czech Republic, France, Germany, the Netherlands, Slovakia, Sweden, and the United Kingdom—in an effort to close existing loopholes to curb the illegal wildlife trafficking from the EU, have stopped issuing ivory export certificates and have called on the European Commission to make this a bloc-wide policy.

⁵ <http://www.dnaindia.com/india/report-world-wildlife-day-clear-evidence-of-rise-in-elephant-poaching-in-india-2185442> (4 March 2016)

⁶ *The Re-Export of Pre-Convention/Antique Ivory from the European Union*. Report prepared for the European Commission by Victoria Mundy, August 2014.

⁷ *The Re-Export of Pre-Convention/Antique Ivory from the European Union*. Report prepared for the European Commission by Victoria Mundy, August 2014.

⁸ Doughty, Christopher E. “Herbivores increase the global availability of nutrients over millions of years.” *Nature Ecology and Evolution*, 2017

⁹ Interpol. (2015). Interpol Strategic Report: Environmental Crime and its Convergence with other serious crimes. Reference: 2015/999/OEC/ENS/SLO

¹⁰ <https://www.theparliamentmagazine.eu/articles/news/without-crackdown-ivory-trade-elephants-could-be-extinct-within-25-years-eu-warned>

¹¹ *Commission Staff Working Document: Analysis and Evidence in support of the EU Action Plan against Wildlife Trafficking*. Brussels, 26.2.2016

This urgency is especially profound considering the current United States presidential administration has forfeited its leadership on this issue. Recently, the Trump Administration has cancelled the previous administration's Presidential Task Force¹² on national strategy against wildlife trafficking from 2014. As the Directorate-General may know, former President Obama's previous adoption of this national strategy¹³ was executed to mitigate the growing global security implications of wildlife trafficking as a conduit to human trafficking, narcotics trade, weapons dealing, and slave labour. It's now been ended by the current administration.

Supported by our points above with citations, we urge the European Commission on the Environment to close the domestic ivory markets and to ban the import and export of all raw and worked ivory items in the European Union with a few limited, practical exemptions which includes museum pieces, antique furniture with less than 5 percent ivory, antique miniature portraits with ivory, musical instruments, and ivory items of historical importance for educational purposes.

Together with the rest of the world against wildlife trafficking, we are grateful to the Directorate-General in considering our comments on this urgent wildlife conservation and global security issue for our strong support to close the domestic ivory markets and to ban the import and export of all raw and worked ivory items in the European Union with limited exceptions.

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¹² Executive Order 13648 to implement the *National Strategy for Combating Wildlife Trafficking*. Executive Office of the President; 02/11/2014

¹³ *National Security Strategy of the United States*. Executive Office of the President; 02/11/2015