

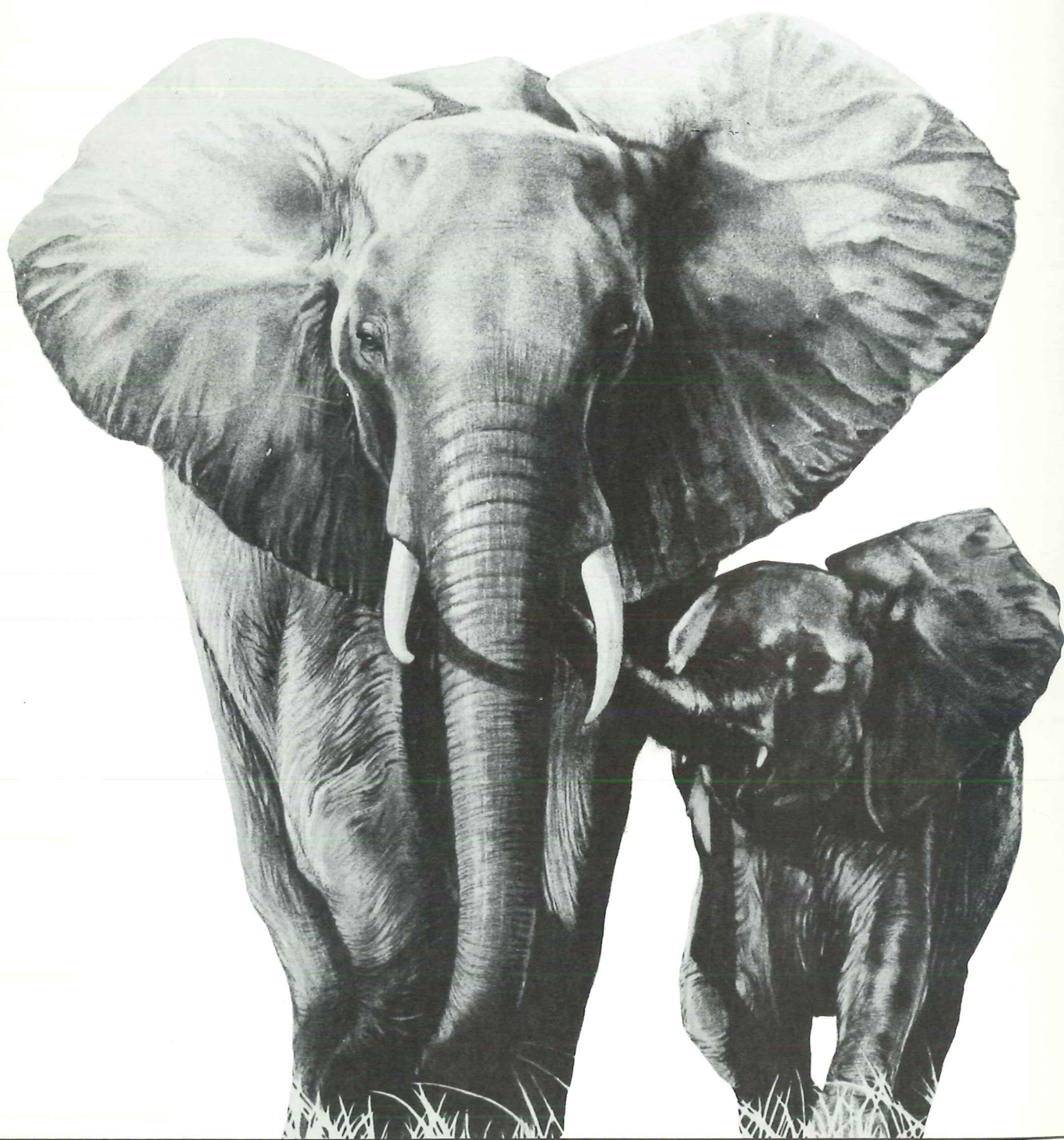
A SYSTEM OF EXTINCTION



THE AFRICAN ELEPHANT DISASTER

A report by the Environmental Investigation Agency

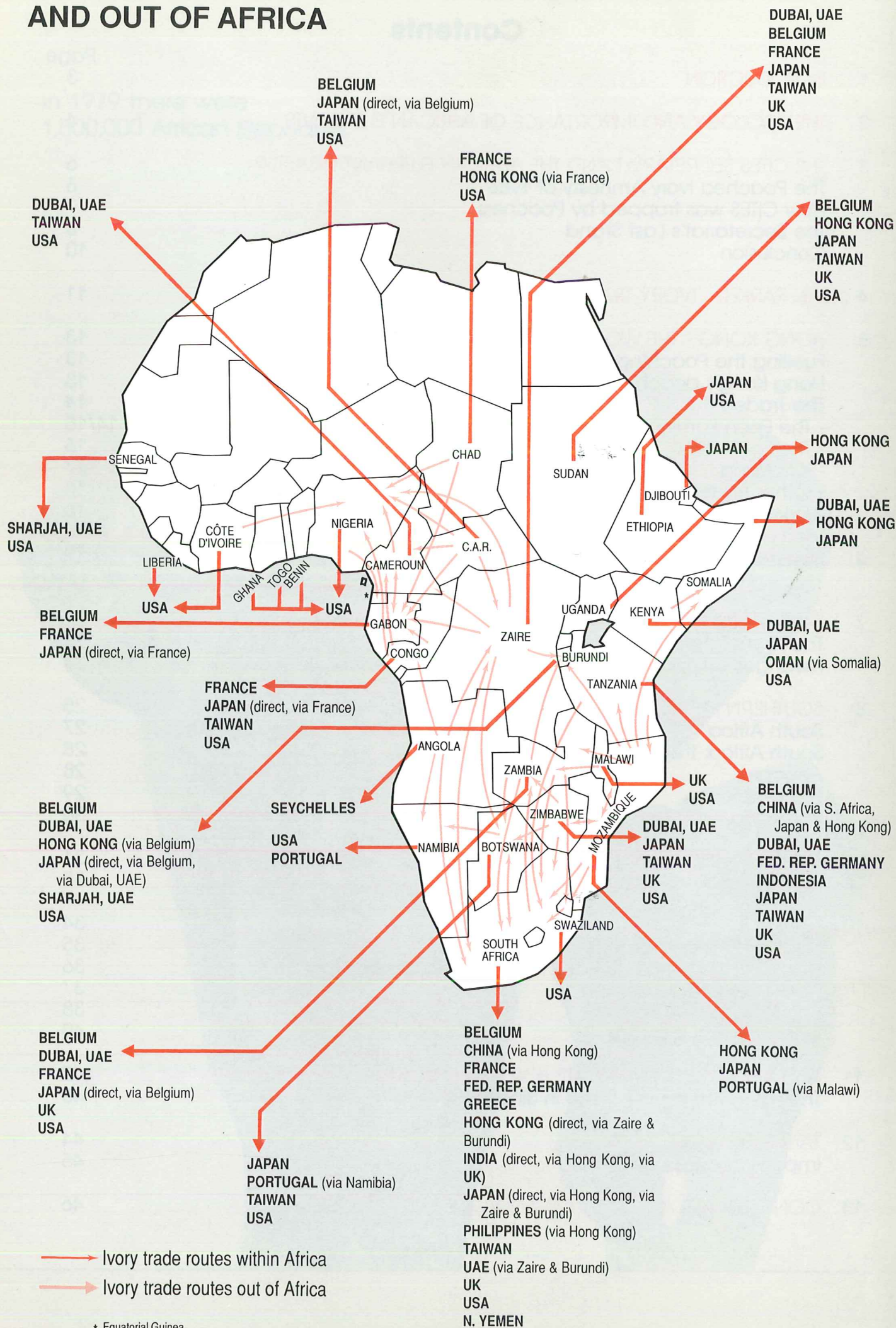
In 1979 there were
1,500,000 African Elephants.



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IVORY TRADE ROUTES WITHIN AFRICA AND OUT OF AFRICA



* Equatorial Guinea

INTRODUCTION

No one who has ever seen or smelt the decaying carcasses of poached elephants, or witnessed the terrible wounds carried by an elephant inflicted by a poacher which slowly kill, or observed the gallant efforts of a rescue of a baby elephant orphaned after the slaughter of its herd, or talked to the heroic anti poaching units who risk their lives against better armed and equipped poachers, could greet the remarks of people like Eugene Lapointe, *CITES, Secretary General, or Rowan Martin of Zimbabwe, or of the Hong Kong and Japanese ivory traders who claim that CITES ivory controls have been a success - with anything but the disgust they deserve.

The extinction of Africa's elephants is just over the horizon, possible within our lifetimes. Traders such as the Poons, the Wangs, the Pongs, the Chans, the Rahemtullahs and Bamakramahs of this world must be delighted at the prospect. Just as the death of the great artist makes a Picasso painting more valuable, so will the illicit ivory they so greedily crave bring a higher price when this magnificent creature - the elephant - is slaughtered into extinction, remaining only a fading memory, or a relic in zoos.

Honest debate on such an important and complex issue must always be welcomed, even if we do not agree with a government representative from Congo that "the extinction of the African elephant is inevitable". The painful examination of life in Africa overlaps with the tortuous experience of following the trail of the ivory poacher and his paymaster - the trader - from the rotting carcass on the ground to the expensive tourist shops of Hong Kong. The complexity of a thousand differing viewpoints which surround the great African Elephant cannot diminish a few obvious facts:

- 1) Elephants are disappearing and will become extinct
- 2) the ivory trade is the major cause of decline
- 3) all efforts to regulate or control the ivory trade have been terrible failures.



A million elephants have died in the last 10 years.

Those people who have opposed a ban on the ivory trade have had their chance to demonstrate that the ivory trade could be controlled. A million elephants have died in the meantime. Now a total ban on the ivory trade must be agreed and implemented.

The encouraging signs of rapidly falling ivory prices in numerous African nations, in response to the closure of the European and American markets, and restrictions in Japan, validate the value and effectiveness of a ban in aiding anti poaching efforts on the ground. As ivory prices have crashed in east and central Africa, so too, have the arguments against a ban.

* Convention on the International Trade in Endangered Species of wild fauna and flora.

Besides for the quest for survival of the African elephant, is the fight for the survival of the integrity of CITES which should be one of the most effective weapons in our armoury to counter threats to endangered species.

That the Secretariat of the world's most important wildlife conservation convention is a place where poached ivory dealers feel more comfortable to visit, than most conservationists are likely to be, is a sobering reflection of the loss of credibility and effectiveness of CITES.

The widespread distrust inspired by Secretariat staff seriously weakens the already inadequate global efforts to protect the ever growing number of endangered species.

The responsibility for the alienation of CITES from many of its Parties must fall squarely on the shoulders of the Secretary General, Eugene Lapointe and a number of his senior staff. Determined to reduce the influence of conservationist non governmental organisations (NGO) on CITES and its Parties, Lapointe has delivered CITES on a silver platter to the poachers and smugglers. The fundamental direction that he has sought to take CITES has been away from conservation to one that is totally pro trade - whatever the cost to the species CITES is charged to protect.

The African elephant issue has been illustrative in confirming the worst suspicions of many people. The tenacious determination of the Secretary General and some of his staff to do everything in their power to obstruct a ban on the international ivory trade is an unprecedented breach of the accepted codes of conduct for international civil servants administering important international conventions.

Greater men, such as the former Secretary General, Peter Sands could rise to the responsibility of making recommendations on proposed listings of species on Appendix 1 or 2, as authorized under the constitution of CITES, without overstepping the boundaries of that authority. Sands was able to express his opinions with fact and diplomacy without being seen to take sides for or against proposals by any Parties. He was trusted by conservationists and traders alike.

But the present Secretary General, while acknowledging his own deep unpopularity has been distinctly unable to rise to the challenge of providing the needed leadership and diplomacy that CITES is crying out for.

The CITES Secretariat's unilateral legalisation of poached ivory stockpiles in Burundi, Singapore, Somalia and other countries in 1986 destroyed any hope that ivory controls might work. This incredible blunder was a disaster for African elephants, in that it rewarded dealers for their investments in elephant poaching. On its own, this decision should disqualify those Secretariat staff involved from further employment with CITES.

Poached ivory traders have contributed to the CITES Secretariat to run the very system that so handsomely rewarded them. The Secretariat has subsequently been doing the ivory trade's bidding, by defending their interests at every opportunity and stacking the deck of the 1989 CITES meeting to ensure a ban is not agreed, or is as limited as possible.

There is a crucial need for a major investigation of what is going on in the CITES Secretariat, with particular reference to the 1986 ivory "Amnesty" and the subsequent policies and activities of the Secretariat. A thorough house cleaning of the Secretariat is essential if CITES is to regain its integrity and re-establish itself as an effective convention to protect endangered species from the depletion caused by international trade.

THE ECOLOGY AND IMPORTANCE OF AFRICAN ELEPHANTS

The magnificent elephant is an intelligent, graceful and sensitive creature whose mysterious ways have fascinated observers for centuries. In the endless discussions about illegal ivory trading and the issues which surround it, the elephant is often left out, like some unnecessary appendage attached to the valuable ivory.

Although ivory has a material value, that value is 100 times greater in a live animal than its tusks alone will ever be.

Elephants are a living and breathing part of the African environment. As a keystone species they play a crucial role in the health of the ecosystems which they inhabit and sustain for the benefit of many other species. The role of elephants within the ecosystem consists of path making, tree felling, soil aeration and seed dispersal as well as the opening up and maintenance of waterholes.



Low elephant densities result in loss of species diversity.

Consequently, the well being of many other animals depends on elephants. Keystone species are believed to play a crucial role in maintaining the linkages in food webs. The removal of such a species may have catastrophic consequences.

In Amboseli Park, studies reveal that low elephant densities result in a loss of species diversity. In Uganda's Murchison Falls Park, it was found that all the important grazing grasses disappeared when elephants were excluded. Grazers such as wildebeest, Thompson's gazelles and buffalo disappeared because they were deprived of their primary food source.

The depletion or extinction of African elephants has far greater environmental effects than has been previously realised. The monotonous architecture and species poor composition of the forests of the Central Congo Basin reflects "the absence of rejuvenation owing to the extermination of elephants."

Elephants act as architects of the forest and savannah environments by opening up dense woodlands which allows the generation of plants on the forest floor. Such vegetation provides a food supply and hospitable environment for large herbivores such as forest buffalo, antelope, hogs, okapis, duikers, bongos, bush pigs and sometimes gorillas, which in turn represent potential food supply for large carnivores such as lion and cheetah.

Food passing through elephants results in the transfer of nutrients, organic matter and seeds from elephant droppings into the soil. A study in the Ivory Coast found that 21 of 71 species sampled in Tai Forest were dispersed by elephants.

Tree felling by elephants can lead to the release of nutrients and increased productivity in the ecosystem. Tree clearance in woodlands may also result in the opening up of springs and an increase in ground water which may then become available to other plants and animals. Elephants also open up swamp pastures to other herbivores by trampling down tall sedges and promoting growth of high quality grasses.



Elephants disperse seeds - vital to the ecology of Africa.

Some scientists believe the megafaunal extinctions in the late Pleistocene age resulted in a loss of dispersal agents for a number of tree species in the Central American dry forest, resulting in habitat impoverishment.

The disappearance of keystone herbivores can account for the cascade of extinctions among smaller mammals during the Pleistocene where 50% of mammalian genera were lost, producing a domino effect as vegetation closed up, eliminating the habitat of smaller mammals.

There is increasing evidence that suggests the possibility of a similar development in the African savannahs and forests as elephant populations are destroyed.

Ivory trading interests and their allies argue that the further depletion of Africa's elephants is not important because "if there are 5,000 elephants left in Africa, the species is not in danger of extinction".

This argument is based on a total ecological

ignorance of the importance of elephants to the ecosystem. CITES is intended "to maintain a species throughout its range at a level consistent with its role in the ecosystems in which it occurs." (Article 4, para 3).

Any continued depletion of elephants throughout their remaining range in Africa will produce serious environmental degradation. The full consequences of such degradation cannot be fully predicted, but a loss of biodiversity and the parallel depletion or extinction of other species cannot be ruled out.

Africa suffers more from environmental degradation than any other continent in the world. The loss of elephants represents not only a material impoverishment of Africa, but also of serious ecological degradation. The ecological, cultural, spiritual and economic value of elephants requires that all possible measures beginning with a total ban on the ivory trade, are necessary to protect Africa's remaining elephants, the ecosystems which they inhabit and the other species which share these same ecosystems.



Elephants open up water holes.



Elephants - more valuable alive.

THE CITES SECRETARIAT AND THE AFRICAN ELEPHANT DISASTER

The scale of abuse of the responsibilities entrusted to the Secretariat by the Parties has become so widespread, and the extensive manipulations to prevent a ban on the ivory trade's so obvious and desperate, that there is no longer any doubt about the ivory trade's grip on major decisions being taken by the Secretariat.

The Secretariat has been a major contributor to the African elephant disaster in the past few years. Just like General Custer at his last stand, the Secretary General and his senior aides have been sealing their own fate through their tenacious and diabolical efforts to preserve the ivory trade.

The Secretariat is fighting against history in its efforts to protect the ivory traders at the expense of the African Elephant. The tide has turned away from the depressing history of failures which has surrounded CITES inability - or unwillingness - to control the ivory trade.

In 1988 in Africa, the elephant situation was as depressing and hopeless as it could be. People who had strived their whole lives to protect elephants in Africa, could see nothing in the future but a continuing saga of slaughter and heartbreak. Elephants were being wiped out in one area after another to provide ivory for the illegal trade. Extinction loomed on the horizon like an apocalyptic messenger delivering yet another blight to the continent of Africa.



Tonnes of ivory is confiscated from poachers in Africa, but most is for sale in consuming countries.

The African elephant disaster was already happening and was getting worse. The same failed efforts by the same people who had overseen African elephant policy for ten years were brought to the first meeting of the African Elephant Working Group of CITES, held in Nairobi in November. These failed efforts had already resulted in a spectacular increase in the price of ivory which fuelled demand and intensified poaching.

A few rays of light penetrated the gloom. In Kenya, Richard Leakey bravely spoke out against the poaching. The formation of the Wildlife Conservation Society of Tanzania was given Presidential blessing. Details of the extent of the illegal trade in southern Africa were made public. EIA had managed to film Poon's infamous carving factories in Dubai and were tracking his and similar operations around the world. Across Europe and north America and Asia, conservationists were rejecting the opinions of "experts" who claimed that a ban on the ivory trade would be counter productive.

The Appendix 1 proposal for African elephants (a proposal for an international ivory trade ban) provided a surge of hope and optimism which has already resulted in a rapid drop in the prices of ivory in Zaire, Congo, Kenya and Tanzania. It has swept away the failed

policies of the past which saw a million elephants die in the previous ten years.

The African elephant disaster is reflected by the tragedy of CITES. The world's most important wildlife conservation convention has fallen into the hands of traders, many of whom have a long involvement in illegal wildlife trade. Money has been the key to the traders power over the Secretariat.

The ivory trade's influence over the present Secretariat is rooted in the implementation of the supposed new generation of controls approved by the Parties in 1985.

Some of these traders giving money to CITES Secretariat are known dealers in large amounts of poached ivory. Most of them will have relied on illicit suppliers at one time or another for poached ivory because of the near monopoly position established by the Hong Kong syndicates. That monopoly was facilitated by the CITES Secretariat's legalisation of their mountains of poached ivory stocks in 1986.

Rather than increase control over the international ivory trade, the "ivory control system" gave the major poaching syndicates the opportunity to rapidly inflate prices by withholding newly legalised stocks from the market. Ivory prices increased by 100% or more in the two years from 1986 to 1988. This increased demand for ivory and inspired increased poaching pressure on Africa's elephants.

The same ivory syndicates earning huge profits from the legalisation of their poached ivory stocks are welcomed into the offices of the Secretary General where he tries to persuade them to provide funding for the CITES Secretariat.

The 1985 draft resolution which outlined the new system was drawn up by the CITES Secretariat. It included an innocuous sounding paragraph "1" which provided for the Parties to take stock of ivory presently held and to advise the Secretariat of such stocks. The new system also created major new responsibilities for the Secretariat in overseeing the ivory trade. But in using these massive new powers, the Secretariat fell at the first hurdle - the "registration" of ivory stocks.

This registration was later referred to as an "amnesty" by the Secretariat for poached ivory stocks. Neither the Secretary General or his deputy, nor anyone from the Secretariat explained this "amnesty" in any paper, or memo, or advice to the Parties. Nowhere was the registration described as an amnesty. But they explained it at length to major dealers in poached ivory. Why?

The Poached Ivory Amnesty of 1986

The CITES system of controls was so riddled with loopholes that they were easily circumvented by the major poached ivory syndicates. It is necessary to ask if these loopholes were the result of incompetence or whether the ivory trade had some influence in drawing them up.

The basic outline of the controls were drawn up by Rowan Martin under contract to the CITES Secretariat. Several recommendations in his report concern proposals that poaching be legalised and that elephants be put under the control of poachers, who would be legally allowed to hunt elephants.

Martin also argues for an "Ivory Producers Export Cartel" which would serve to greatly drive up the price of

ivory. It is unclear how Martin thought such measures would conserve elephants when higher prices could only result in increased poaching pressure.

The proposal to set up an ivory cartel is one highly favoured by the Hong Kong ivory trade. Besides Martin, its chief proponent has been Ian Parker, who admits to having represented the interest of major dealers in poached ivory. Parker asserts that conservationists should support K.T. Wang's efforts to get a monopoly on the ivory trade because "Wang would stabilise the market, then drop the price!"



Eugene Lapointe, Secretary General of the CITES Secretariat.

Martin states in his 1985 report to the CITES Secretariat that "I value very highly Ian's pragmatic advice on all issues relating to the ivory trade and regard Parker as a

major philosopher."

How much influence did the ivory trade have in drawing up the new controls?

The CITES "ivory trade controls" implemented in 1986 had numerous major flaws which left major loopholes intact:

- confiscated ivory could be legalised by governments. From Africa to China, dealers could easily collude with government officials to get their ivory confiscated and legalised with CITES permits for a price.
- worked ivory was not controlled. This was too great a burden on the ivory industry, it was said. This led directly to the setting up of carving factories in Dubai in the UAE, Singapore, Taiwan, Macau and Zaire to partially carve ivory for movement onto the Hong Kong and Japanese markets.
- ivory should be registered. The Secretariat made a unilateral decision to legalise some 350 tonnes of ivory held in Burundi (89 tonnes) and Singapore (270 tonnes), and other amounts in Somalia, Djibouti and other countries. This decision to legalise hundreds of tonnes of ivory was made without reference to the Standing Committee of CITES. The Secretariat interpreted the registration to mean an "amnesty" for such poached ivory.
- the "quota system" for limiting ivory exports had no mechanism whereby quotas could be set. The entire system was designed to ensure that no meaningful restrictions were imposed on the ivory trade.

How Cites was trapped by poachers

Zulfakar Rahemtullah is one of the traders, referred to in a CITES press release, dated May, 1986, who offered bribes to CITES Secretariat staff to get his ivory legalised. He owned over 60 tonnes of ivory held in Burundi through certain local dealers, known to be his agents. He is also the reputed owner of most of the present stocks held in Burundi.

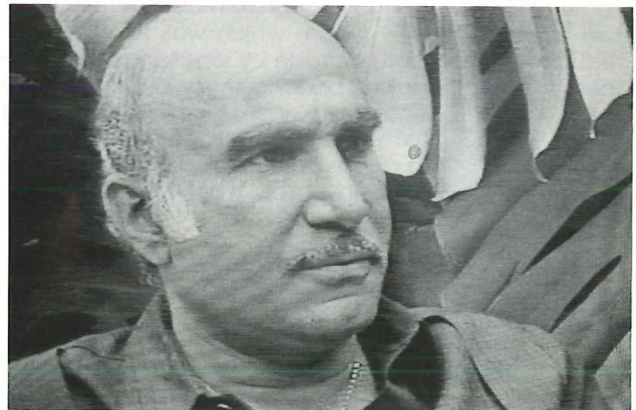
The first response to overtures from Burundi apparently, was that the Secretariat wouldn't rubber stamp ivory that did not have proper documentation. In early 1986, Rahemtullah went to CITES in Lausanne and offered money to get his ivory legalised. Eugene Lapointe and Jacques Berney gave him a detailed briefing on how to get the ivory legalised under Conf. 5.12 which allowed for the "registration" of stocks. Rahemtullah offered certain Secretariat staff a bribe of \$50,000 if his ivory was legalised.

Later, Rahemtullah and another ivory dealer from Uganda, George Ebola, is said to have flown to Mogadishu where they met Chris Huxley, from the CITES Secretariat staff. Rahemtullah offered Huxley \$50,000 to get CITES to legalise the Burundi ivory.

The Secretariat then referred Rahemtullah to Ian

Parker. Parker agreed to help Rahemtullah get his Burundi stocks legalised by CITES for a fee of 3% of the poached ivory in Burundi. When Rahemtullah agreed to the fee, Parker explained that Burundi would have to join CITES and give an undertaking to abide by the new ivory control system.

Rahemtullah went to Bujumbura and bribed government officials and got them to send a letter to the CITES Secretariat saying they wanted to join CITES and wanted to register the ivory.



Zully Rahemtullah who attempted to bribe CITES officials to legalise the 1986 Burundi ivory.

In September, 1986, Ian Parker went to Bujumbura to register, on behalf of the Burundi Government, some 17,800 tusks from poached elephants. Although Parker had been the consultant to the Secretariat in 1981 whose recommendation that all raw ivory should be stamped with punch dyes that include a set of identifying numbers, and this was later included in Conf. 3.12, Parker did not punch stamp the 17,800 tusks. He merely wrote the numbers on the tusks with indelible pen.

At the 1987 CITES meeting, the USA strongly criticised the Secretariat for both the "amnesty" and the fact that the Burundi tusks had been marked with a felt tip pen thereby increasing the possibility of dealers committing fraud by removing the pen marks.

The Burundi dealers wanted to extend the registration deadline of 25th September because they had more poached ivory being delivered from Zaire, Tanzania and other countries. Parker states he was offered \$750,000 to extend the date. The Secretariat were already starting to panic, Parker said, because they were already being criticised for proceeding with the registration.

Once the poached ivory, with a value of \$40 to \$50 a kilo, received CITES "legal" permits, its value increased overnight to at least \$100 a kilo. Some Japanese traders later bought these same stocks for \$170 to \$300 a kilo. Overnight profits in the order of \$20 million were earned by the owners of the stocks.

The Burundi "registration" proceeded before that of Singapore, where Chris Huxley, from the Secretariat staff "registered" some 270 tonnes of poached ivory - just part of the stocks that were actually in Singapore. Lapointe asserts that he was unaware of the amount of ivory, but this is denied by Huxley who said the Secretariat heard regular rumours that they were very substantial. Huxley also visited Singapore annually, and had contact with traders there.

Just before the deadline in Singapore, 26 tonnes of ivory were flown from Burundi to Dubai in the UAE. When the UAE decided not to bother "registering" ivory with CITES, this 26 tonnes, belonging to KT Wang, was flown into Singapore, 18 hours before the expiry of the deadline, and was duly legalised by the CITES Secretariat.

Lapointe said it was not up to him to refuse to legalise poached ivory regardless of the amounts involved. Jacques Berney and Chris Huxley express disdain for countries like the USA and Germany which, in 1987, expressed strong concern at the legalisation of the poached ivory stocks. Lapointe considers the whole "registration" process to be a tremendous success.

He and the Secretariat staff boast that they have "cleaned up the legal ivory trade"; that legal ivory trade has dropped from 1,000 tonnes to 175 tonnes in the past six years. But poached ivory is from illegally killed elephants, and Lapointe's decision to legalise the ivory of Rahemtullah, Wang, Poon, Lai, and other major criminals, provided handsome financial rewards for these international wildlife crooks.

Thanks to Lapointe, they achieved control of the international ivory trade, pushed ivory prices through the roof, and caused further destruction of Africa's elephants. Some of them were kind enough to make a small donation to run the CITES system which was so effectively reducing the illegal ivory trade by legalising it. None of them stopped acquiring poached ivory, and all of them were able to spend their windfall profits by making further advances to middlemen and dealers, who in turn paid the poaching gangs across Africa, and equipped them with weapons and bullets to go out to kill more elephants.

The Secretariat's last stand

The flow of ivory into Burundi continued unchecked after the 89 newly legalised tonnes of ivory were flown off to Hong Kong and China via Belgium, as noted above.

As a result of the Secretariat's "amnesty" the owners of the Singapore stocks obtained CITES permits for ivory that was then carved and sent openly into Hong Kong, which then did not require permits for worked ivory imports. More ivory was smuggled into Hong Kong in containers. The CITES permits were available if the smuggled shipment was detected, but when they weren't the permits were applied to new imports of poached ivory.

Singapore continued imports of ivory from Dubai, both raw and worked. Parts of the Singapore and Burundi stocks of newly legal ivory have made their way into Japan - perfectly legal. Japan continued to import worked ivory from Dubai via Singapore and Taiwan.

The Japan Ivory Importers Association (JIIA) collect a 1.2% surcharge on all ivory imports to make donations to the CITES ivory unit. The Secretariat therefore has a direct financial benefit from the legalisation of poached ivory.

The Secretariat's activities in trying to prevent an international ivory ban are being viewed with increasing suspicion by a growing number of Parties, conservationists, and journalists - with good reason.

Problems with Total Trade Ban on Ivory Adequate Supply is Necessary for Conservation of Elephants

by KANEKO, Yoshio (CITES Secretariat, Switzerland)

One after another, Western nations announced they were enacting measures to ban the import of ivory. Their reason is that ivory consumption is driving the African elephant to the brink of extinction. The tone of the world media is more critical toward Japan than toward the other ivory-consuming nations for using ivory in personal seals and amulets plectrums, and the media are in hot pursuit of Japan, the ivory mass-consumption nation. The Japanese media have begun to march lock-step with them.

For the conference of CITES signatories to be held in October, Kenya and other countries have submitted a proposal to transfer the African elephant from its current listing on Appendix II (commercial trade authorized on the condition that the country of origin issues an export permit) to Appendix I (all commercial trade forbidden). If this is adopted, international commercial trade of ivory will be totally prohibited. However, this transfer has some problems. For example, only CITES signatories will be bound, while non-party countries are able to continue commercial trade. Also, after commercial trade is banned, conscientious traders will be obliged to surrender their livelihood and find new jobs, while wicked traders will carry on as before with their illegal trade. Without a legal supply the price will vault to new heights, possibly resulting in the even greater flourishing of wicked traders. Zimbabwe, Botswana, and South Africa have established conservation and management systems for African elephants, with the animals being culled regularly. This is because when elephants increase too much, the vegetation is damaged and the ecosystem is adversely affected. Culled elephants are processed domestically; the meat becomes food for local people, and ivory and leather products are exported. Elephant culling provides local people with contribution to their field of nature conservation. Additionally, the foreign currency thus obtained makes a significant transfer of the elephant to Appendix I will rob them of these possibilities. We must give separate consideration to these countries, and those such as Kenya and Tanzania which advocate a total ban on commercial trading because of the precipitous drop in the elephant population.

The cooperation of the conscientious industry is essential to the protection of the elephant. In the past, when Japan used to import a large quantity of ivory, the industry, which was concerned with the depletion of ivory resources, formed an association under the guidance of the Ministry of International Trade and Industry (MITI). Since the time that industry representatives first visited the CITES secretariat five years ago, Japanese industry has abided by the convention and actively supported it.

The CITES secretariat firmly believes that their cooperation has indirectly contributed to elephant conservation and the elimination of illegal traders. However, such conscientious traders are now the target of international criticism, and are apprehensive over the possibility of surrendering their livelihoods and finding new jobs.

As a critical world public opinion builds against Japan, MITI on June 19 took the step of no longer allowing ivory imports from countries other than African countries of origin which are signatories. This might be termed a landmark action in that it eliminates transactions with the intermediary countries, which accounted for an overwhelmingly large volume, and until now comprised a hothead of illegal trading. It also seems as though some people closely associated with Prime Minister Uno argue for a total ban, but in view of the fact that the African nations do not agree on this issue, the fact that direct trade with Africa was not prohibited can be credited as Japan's consideration toward the ivory-producing nations.

In the future Japan should carefully note what will truly work for elephant conservation — without being led astray by emotional arguments — and should aggressively state its opinions in international society. Moreover, Japan should use ODA to play a central world role in the field of wildlife conservation, including elephants, and should make the training of personnel a priority of vital importance. This is the responsibility of Japan as an ivory consumer and an economic power.

(Translated from the *Asahi Shinbun* Speaker's Forum, 25 July 1989; a service of JAPAN ENVIRONMENT MONITOR)

Article written by Mr Kaneko of the CITES Secretariat in Japanese press opposing the international ivory trade ban.

Secretary Generals, their deputies, and staff of international conventions are supposed to be neutral administrators, not lobbyists protecting the interests of a trade. In the past year, the Secretariat has:

- attempted to dissuade major US groups from promoting a boycott on buying ivory;
- pressed for the legalisation of another 90 tonnes of poached ivory in Burundi;
- dismissed as "impractical" the return of these Burundi ivory stocks to the countries of origin;
- ignored Tanzania's claim of ownership of part of the Burundi stocks;
- sought arrangements with the Burundi government that part of the proceeds from the sale of the stock would go to the Secretariat
- is seeking to overturn provisions of Conf. 5.12 to allow legalisation of the Burundi stocks and continued ivory trading;
- received substantial funding from traders who benefited from the 1986 Secretariat legalisation of poached

ivory - and who continue to trade in poached ivory:

- publicly opposed the Appendix 1 listing for African elephants through public campaigning including TV, radio, newspaper and magazine interviews; also wrote an article for a major Japanese newspaper opposing the ban and advocating continued Japanese ivory trading;
- misused CITES resources to distribute biased information materials opposing an international ivory ban, to the Parties and press;
- paid for an all expense paid trip for French journalists to come to Lausanne to receive an anti Appendix 1 press briefing;
- in so doing, contravened a resolution proposed by Canada which establishes clear restrictions and criteria whereby the Secretariat is allowed to make recommendations to the Parties on Appendices listings;
- discouraged participants from attending the two meetings of the African Elephant Working Group, without reference to the Chairmen of the meetings - if such participants were supportive of an ivory ban;
- produced pro ivory trading resolutions for the second meeting of the AEWG, without any consultation with the Chairman of the meeting or of the Standing Committee,

with the intention of obstructing and manipulating debate, after Appendix 1 proposals had been received from Parties for which the Secretariat was rebuked by the USA, Germany and Tanzania:

- attempted to insert a misleading statement into the minutes of the second AEWG meeting by incorrectly stating at the very end of the meeting that "I note there is a consensus that Conf. 5.11 must be changed"-J. Berney- (ie which would allow continued ivory trading in existing stocks) - which was successfully challenged and repudiated by the USA;
- has actively colluded with the Japanese management authority to oppose an ivory ban, by providing them with a written brief of points against such a ban;
- has drafted and distributed a resolution proposing to overturn Conf. 5.11 or exempt ivory from its provisions, without any mandate or direction to do so from the AEWG;
- commissioned a report on the ivory trade, which was paid for by the ivory trade, and carried out by an ivory trader, which produced recommendations that CITES should legally allow the ivory trade to wipe out most of the remaining elephants in Africa - which would be in violation of the CITES constitution;

PLEASE PASS THIS MESSAGE TO MR. S. WADA

和田様

無事、ボツワナまでたどりつきましたか。たぶん、象牙業界に好意的な材料になるのではないかと思つて、以下のメモを送ります。機会をみつけて、自分で言うかあるいはトムに言わせてください。

1. 日本においては、ワシントン条約関係では、象牙業界がいちばんまじめで、協力的である。85年くらい、EQ制度を完全に遵守し、また、制度そのものをサポートするために、ワシントン条約事務局のアイボリーユニットに資金援助してきた。日本政府は日本の象牙業界は世界でもっとも善良な業界のひとつだと思つている。
2. 日本では、象牙のほかさまざまな業界があるが、必ずしも、すべての業界がまじめであるとは言えない。そういった業界とワシントン条約の遵守に関して交渉するときはいつても、象牙業界のことを例に出して、彼らを見習って、こういういい業界になるようにと繰り返して説教にあつてきた。
3. しかし、象牙のような善良な業界が、なぜか不当に国際的に非難されており、また、失業問題に悩んでいる。
4. このようにまともな業界が批判されつづけているかぎり、管理当局でありまた国内産業を管轄する通商省としては、他の業界に対して、象牙のようにまじめにやれとは言いがたいし、言うことができたとしても説得力の弱いものとなってしまう。
5. 日本はワシントン条約上の数々の問題を抱えており、通商省はいろいろな業界と話し合いをつうじて、着実にその問題を解決して行っている。日本でのワシントン条約の履行をよくするうえでも、他業界の模範となる象牙業界は潰してはならない。

金子

追伸。あの滝本くんが、しんどい、しんどいと、罵詈雑言を吐いています。とにかくボツワナ会議の結果、日本のとるべき方向が明らかになります。ハンクスは全面禁止に反対のため急遽代表からはずされて、代表はクレーマーだという話をご存じ?ハンクスはやめるかもしれないという話も。

FROM 101

021 20 00 04

TOTAL P. 2:

Dear Mr. Wada,

Have you arrived safely in Botswana? I'm sending you the following memo presuming that it might be useful information for the ivory industry. Please find an opportunity for mentioning them yourself or making Tom mention.

1. In Japan, amongst all the industries concerned with CITES, the ivory industry is the most honest and co-operative. In 1985, it has perfectly observed the Export Quota system and has given financial help to the Ivory Unit of the CITES Secretariat to support the system itself. The Japanese government considers the ivory industry as one of the most dutiful industries in the world.

2. Besides the ivory industry, there are various sorts of other industries in Japan, but not all of them are sincere. Whenever we negotiate with them in observance of CITE, we have tried to persuade them over and over again to follow the good example of the ivory industry by presenting them as an example.

3. However, the ivory industry, which has been dutiful, has been somehow under an unreasonable attack and has felt threatened by with unemployment problems.

4. As long as such a right minded industry as this continues to be criticized, the Ministry of International Trade and Industry, which has jurisdiction over internal industries as well as being an administrative authority, finds it difficult to be right minded like the ivory one, and even if we can say that to them, there will persuasion in it.

5. Japan has got various problems as far as CITES is concerned. The MITI has been steadily solving these problems through negotiations with various industries. For the sake of improvement in implementation of CITES in Japan, the ivory industry should not be wrecked, as it can be a model for the others.

KANEKO

P.S.

Mr. Takimoto is making complaints that the situation is very hard. Anyway, as the result of the Botswana meeting, the course Japan should take will become clear. Do you know that Mr. Kramer will be the representative, because Mr. Hanks was suddenly relieved of position as representative for having been opposed to an overall ban. There is a rumour that Mr. Hanks may resign.

Translation of fax sent to the Japanese delegation by Mr Kaneko of the CITES Secretariat to assist the Ivory Industry July 1989.

The Secretariat has not only been publicly campaigning against an Appendix One listing for African elephants, it has openly and cynically attempted to

manipulate the CITES system to prejudge debate by the Parties and influence the outcome of decisions to be taken by the Parties in Lausanne.

The Secretariat's activities contravene a resolution proposed by Canada and agreed by the Parties in 1985, "Guidelines For The Secretariat When Making Recommendations in Accordance With Article XV". The background to the document introducing the Resolution notes that:

"At no time or for whatever purpose should the Secretariat be perceived as being biased for or against any Party or non governmental organization (NGO) participating or having an interest in CITES. To avoid guesswork and biases entering into Secretariat recommendations, it is necessary to establish guidelines and requirements to be followed by the Secretariat when making recommendations."

The approved resolution requires the Secretariat, when making recommendations on proposed listings of species on Appendices 1 or 2, to cite all references in the text of a recommendation in accordance with a recognized scientific standard for such citations. The resolution provides other guidelines including that "...recommendations shall be limited to general comments concerning the acceptability of the proposed format and whether or not it meets the criteria established by the Parties."

Conclusion

The Secretary General and a number of his staff are guilty of gross incompetence at the very least. They cannot be trusted to objectively implement the decisions of the Parties and have proven themselves untrustworthy and incompetent to carry out the responsibilities entrusted to them by the Parties.

The Environmental Investigation Agency does not consider it part of its job to critically examine the operations of the Secretariat of an international convention such as CITES. However, when the activities of the employees of such a Secretariat become so intrusive and beyond their constitutional mandate, and threaten

the integrity of the convention itself, we feel we have no choice but to publicly provide the information which has been made available to us.

There are many questions which naturally arise from the activities of certain members of staff, both past and present, of the Secretariat.

The solution lies not just in the dismissal of Secretariat staff, or of a United Nations Environment Programme (UNEP) enquiry into their activities. The real answers can only be discovered by thorough police investigations to discover if any irregularities or fraudulent activities have taken place which have broken the law.

Ian Parker - Ivory Trader and Consultant to CITES

Ian Parker was interviewed for Animal Kingdom magazine, in 1980 by Edward Ricciuti.

"Among his other hats have been those of ivory trader, wildlife management consultant and co-author of several respected scientific works on elephant ecology. He also knows how to shoot elephants. Reputedly an expert marksman, he has killed several thousand elephants in culling operations over the years."

When they first met, Parker told Ricciuti, "Before we talk I want you to know I'm being paid to discuss ivory".

Ricciuti continued, "What he means, he explains, is that a loose association of businessmen in the international ivory industry are funding his efforts to bring organisation and, ultimately, self regulation to the trade."



Ian Parker, "I said I would help him get his ivory legalised but it would cost him 3% of the ivory".

Since then, Parker has worked as the agent of various ivory trading interests, including a company trying to sell a major consignment of ivory in Somalia in 1986.

Parker states that he worked for a major Burundi dealer - Zully Rahemtullah - to help get CITES to legalise 60 tonnes of ivory in 1986. His story provides a fascinating insight into the way that ivory traders and their paid agents have achieved powerful influence over the CITES Secretariat.

Ian Parker, told EIA in November, 1988 that: "In 1986, a Burundi ivory trader contacted the CITES Secretariat and said he wanted to legalise his ivory. The CITES Secretariat met with the trader who offered them \$50,000. The CITES official advised them of the Buenos Aires Resolution which provided a means to register ivory. CITES told the trader to call a consultant - me - in Nairobi."

A few days later, I got a phone call from the trader and I went to meet him for lunch. He wanted to know how to legalise his 60 tonnes of ivory. I said I would help him get his ivory legalised but it would cost him 3% of the ivory. He agreed with that. So I told him to get his ivory registered, he would have to get the Burundi government to join CITES. He said getting Burundi to join CITES was no problem, he just had to bribe the right people. So he bribed certain government officials and the guy came with the papers, stamped by the Burundi government, to join CITES.

Then the CITES Secretariat hired me as a consultant and paid me to go to Nurundi to register the ivory stocks. I registered the whole 89 tonnes in 9 days and marked them all myself, giving them their registered numbers.

Then the traders wanted to delay the deadline for registering their ivory beyond the 25th of September, because they had more ivory coming in from Tanzania and Zaire. The traders offered me \$750,000 to extend the registration date.

I had been retained at the same time to work for the Burundi government as their "Ivory Officer" and I stam-

ped the Burundi export permits with the government's seal and signed them myself." - see page 12.

Parker subsequently stated that within a few weeks of the registered ivory being shipped out to Hong Kong via Belgium, large amounts of poached ivory were again pouring into Burundi.

In April, 1988, Ian Parker again went to Burundi with Jacques Berney, Deputy Secretary General of CITES to inspect the new stockpile of poached ivory that the Secretariat has subsequently tried to get legalised by CITES.

Parker has a business colleague, Stefan Hayden, who is a major shareholder in the 'Botswana Game Industries' (BGI) group of companies which has wide interests, stretching from ivory trading to real estate to silk farming. Hayden is a co-director with Ian Parker, of 'Sashe Silk', one of the BGI group of companies. 'Sashe Silk' is located on the company's Francistown premises.

BGI are also active ivory traders and buy ivory from Zimbabwe's huge "culling" programme, from the South African "culls" in Kruger, and from Mozambique.

Around October of 1988, Hayden, who is South African and based in Johannesburg was negotiating to buy 60 tonnes of ivory from Burundi dealers. Hayden sought financing from a local bank to arrange the purchase and shipment of the ivory, but claims the deal fell through because he discovered the ivory was not "legal".

Parker recently produced a report for the CITES Secretariat, "The Raw Ivory Trade, 1979 - 1987", dated 10th May, 1989 for which \$30,000 was provided by the Hong Kong and Kowloon Ivory Manufacturers Association.

Parker attempts to show that other causes such as habitat loss are responsible for the decline of elephants. In his view, the ivory trade is a benign force, repeatedly referred to in the metaphorical imagery of a river; "...the flow of ivory resembles a large slow flowing river..."

This paints a pretty face onto the activities of ivory traders who advance funds to middlemen and dealers who in turn go out and pay poachers and provide arms and bullets which are used to kill elephants.

According to Parker, "The concept of a structured trade directed and controlled by a few 'big fish' has been wrong...Certain prominent traders' names have appeared in the press with the insinuation that they are 'overlords' in the mafia sense. They may have sailed close to the wind" Parker asserts, but "their primary mode of operation has been astute use of bases where their activities are not illegal".

The major ivory syndicates of Wang, Poon, Rahemtullah, Pong, Chan, Bamakramah etc must be bemused to hear Parker's charming defence of them. Even more hilarious is Parker's recommendations to CITES on future ivory controls.

Parker proposes that any new system of CITES ivory control regulations should not be allowed to stand in the way of the Hong Kong ivory trade acquiring the ivory from most of Africa's elephants. That is, CITES should endorse poaching, in the same way that the Secretariat has legalised poached ivory in Burundi, Singapore and elsewhere.

Parker's arguments against a ban on the ivory trade are welcomed at the CITES Secretariat. A document distributed by the Secretariat in June, which opposes the ban on the ivory trade, reads remarkably like Parker had written it or made substantial contributions to this bizarre document.

Parker's arguments against an ivory ban, which are so frequently echoed by the Secretariat and Rowan Martin, are understandable when his active involvement in that trade is considered. His careful concealment of the extent of that involvement does not conceal the major conflict of interest in his working for the CITES Secretariat - a fact that has apparently escaped the notice of Eugene Lapointe and his senior staff.

Fiche de renseignements sur les défenses

DUPLICATE

Numéro du permis de réexportation : B1/03/86
 et date de délivrance :

Nombre total des défenses dans l'envoi :
 Poids total des défenses de l'envoi :

03/10/86

PAGE No 277/86

A. Numéro de la défense				B. Numéro de la défense			
Code ISO	Numéro de série	Année	Kg.	Code ISO	Numéro de série	Année	Kg.
B I.	15251	1986	5.4	B I.	15276	1986	6.8
B I.	15252	1986	5.8	B I.	15277	1986	6.7
B I.	15253	1986	5.8	B I.	15278	1986	6.3
B I.	15254	1986	5.4	B I.	15279	1986	6.3
B I.	15255	1986	5.0	B I.	15280	1986	6.5
B I.	15256	1986	5.4	B I.	15281	1986	6.6
B I.	15257	1986	5.3	B I.	15282	1986	6.2
B I.	15258	1986	5.7	B I.	15283	1986	6.6
B I.	15259	1986	5.4	B I.	15284	1986	6.7
B I.	15260	1986	5.4	B I.	15285	1986	6.3
B I.	15261	1986	5.5	B I.	15286	1986	6.7
B I.	15262	1986	5.6	B I.	15287	1986	6.8
B I.	15263	1986	6.4	B I.	15288	1986	6.1
B I.	15264	1986	6.6	B I.	15289	1986	5.9
B I.	15265	1986	6.3	B I.	15290	1986	6.6
B I.	15266	1986	6.2	B I.	15291	1986	6.0
B I.	15267	1986	6.6	B I.	15292	1986	6.6
B I.	15268	1986	6.9	B I.	15293	1986	6.0
B I.	15269	1986	6.2	B I.	15294	1986	6.6
B I.	15270	1986	6.4	B I.	15295	1986	6.0
B I.	15271	1986	6.9	B I.	15296	1986	6.4
B I.	15272	1986	6.1	B I.	15297	1986	6.3
B I.	15273	1986	6.2	B I.	15298	1986	6.2
B I.	15274	1986	6.4	B I.	15299	1986	6.3
B I.	15275	1986	6.7	B I.	15300	1986	6.1
TOTAL PCS = 25 Kg = 149.6				TOTAL PCS = 25 Kg = 159.6			

RESUME :-
 A = PCS = 25 KILOS = 149.6
 B = PCS = 25 KILOS = 159.6
 TOTAL = 50 = 309.2

NUMERO DE DEFENSE DE 15251 A 15300
 POIDS CONTROLÉ & CERTIFIÉ
 NOM JAN PARKER

SIGNATURE 



F = 5 BAGS

Parker's signature on Burundi Government document listing 1986 'registered' stock.

HONG KONG

THE WORLD'S IVORY MARKETPLACE

Fuelling the poaching:

The Hong Kong ivory trade has been the major driving force for elephant poaching in Africa. Backed by Japanese traders, they have placed orders with agents working in Africa and in recent years have successfully exploited the CITES system to increase their control over the market. The system is so flawed that it is fair to ask whether the trade did not cleverly ensure that loopholes were built into it from the start? It was clear before 1985 that massive amounts of poached ivory were being moved via intermediary countries such as the UAE, Macau, Singapore, and Taiwan and yet the system ignored any control over worked ivory when it was obvious that this would be a major loophole. However, the existence of a system was bound to push prices up which would favour those traders with stockpiles and well established international routes.



Shops specialising in ivory cater to the tourist trade. Tonnes of ivory leaves Hong Kong in personal baggage.

Hong Kong traders have been steps ahead of the CITES system and have moved from one country to another to exploit elephants. In 1984 factories were set up in the Portuguese territory of Macau. Shipments poured into Macau, they were then worked and moved on to Hong Kong. When this became more difficult, most, but not all, traders moved on to Singapore and set up factories. In 1986, when they heard of the amnesty offered by the CITES Secretariat, they flooded Singapore with raw ivory.

Meanwhile merchants working for Hong Kong traders were exploiting Burundi's role to the full. Documented evidence links the Burundi trade, which extracted over 1,330 tonnes of ivory from neighbouring countries' elephants in the five years up to 1987, to Hong Kong dealers. Many of these merchants are still operating today.

When Singapore became a Party to CITES in 1986, carving factories were set up in the UAE and Taiwan by Hong Kong traders. Singapore became an important staging post for worked ivory on its way to Hong Kong. Again, Hong Kong and Japanese money helped to build the empires of the main syndicates by simply exploiting loopholes in the CITES system.

It is reported that there are currently 670 tonnes of ivory stockpiles in Hong Kong, the ivory from about 70,000 elephants. No doubt most of it will have CITES permits or be 'worked' ivory, but nonetheless most of it is from poached elephants at the expense of the country from which it was taken.. **Hong Kong still does not require CITES export permits for worked ivory making it a 'safe' haven from where the ivory can enter legal**

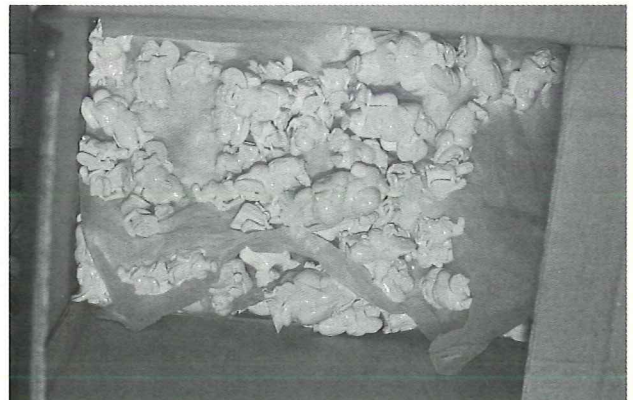
trade and increase in value. The Hong Kong trade cannot legitimise its activities by using a totally flawed and failed system as its defence. The CITES ivory control system has utterly failed to control the slaughter of elephants but has provided the means for Hong Kong families to increase their sphere of influence and wealth. The Hong Kong trade has been aware of the situation but has continued to buy the poached tusks. **There can be no pity now when the traders are faced with a complete loss of markets on which to sell their booty. The pity has to be for the elephant herds decimated to fuel their greed.**

Hong Kong's poached ivory stockpile

As the world's marketplace, Hong Kong is the most important destination for illegal ivory. Once inside the territory it can be carved and sold on to the international market at the top prices. Hong Kong traders are hoping that their ivory stockpile will be allowed into international trade even if an international ban is agreed. Lobbying by the CITES secretariat on their behalf has given them some comfort. **In direct response to this, the Poon family are still looking for poached ivory to transport to Hong Kong in anticipation of continued trade endorsed by CITES.**

Many different methods have been used to build up the current stockpile. Some are described below.

- 1) Containers of ivory have been smuggled into Hong Kong. Less than 1% of all sea container traffic is checked by customs. Sometimes CITES documentation may be available for a shipment if it is seized. This reduces any risk of confiscation. The same documentation would be used for the next container if the shipment was undetected.
- 2) Some of the 1986 Singapore registered stockpile was carved in Singapore and imported into Hong Kong before August 1988 without requiring a CITES permit. Spare permits were applied to poached tusks which had been smuggled into Singapore for shipment to Hong Kong.
- 3) Registered stockpiles from Belgium, Singapore and Burundi were poached ivory. These have been imported into Hong Kong and the owners benefitted financially by the increase in value as well as possessing valuable permits which could be used in other deals.



Semi-carved ivory from the UAE via Singapore in one of the Poon's Hong Kong factories.

- 4) The CITES system has virtually ignored 'worked' ivory, therefore setting up an enormous loophole which has been fully exploited. Carving factories were set up outside Hong Kong to 'work' the poached tusks and until August 1988, when Hong Kong first required CITES permits for 'worked' ivory, it flooded into Hong Kong. Once in the Territory it had entered the lucrative international market.
- 5) Although the closure of the 'worked' ivory loophole cut down the flood of open shipments, the ivory still found its way to the Hong Kong market. Other routes were deployed via Singapore (which still does not require CITES permits for the import of 'worked' ivory) and Taiwan.
- 6) In documented interviews in Dubai, Ajman, Singapore, Taiwan, South Africa, and Hong Kong, traders admit that their poached ivory is destined for Hong Kong.
- 7) Merchants operating in Africa have been known to bribe an African Management Authority to notify CITES that in the coming year a high quota would be required. In one case 10 tonnes of ivory from Burundi was then flown to this African country, issued with permits within the inflated quota, verified by the CITES Secretariat, and flown on to Hong Kong.
- 8) Waste from carving can be up to 40% and yet Management Authorities accept it as 5%. The balance can be applied to worked items imported from countries such as the UAE or Zaire and CITES export permits can be easily obtained when necessary.

The Traders:

This British territory has been the centre of the world ivory trade for decades. In the last few years the key traders have reduced in number to a few influential and very wealthy families. It is these traders that have dominated Hong Kong's ivory business, and because of Hong Kong's role as the major international market, dominated the international trade. **These are the families which have dealt in poached tusks.**

These families have developed syndicates which control the supply of most of the ivory to Hong Kong's ivory manufacturers. The value of Hong Kong to the illegal traders is its market role: once poached ivory is within the territory it can be carved and sold as 'legitimate' ivory at the highest prices. **Hong Kong still does not require CITES permits for the export of**

The Poon Family



George Poon outside his UAE factory in Ajman.



'Africa Hydraulics' consignee for Poons' ivory from the UAE - by using 'front' companies the Poons keep their activities hidden from prying eyes.

worked ivory. It therefore has become the target destination for most poached ivory. Since as much as **94% of all ivory in trade began as a poached elephant**, Hong Kong bears the greatest responsibility for legitimising this elephant slaughter.

The names of some of the illegal traders have been known to governments, the CITES Secretariat, the ivory trade, and conservationists for many years. Yet throughout the last few years they have been allowed to build up their empires, based on CITES registration of their poached stocks. Their influence has permeated every part of the trade with their money invested in businesses in Africa, the Middle East, Europe, North America and the Far East.



Poon Tat Hong in Hong Kong.

THE POON FAMILY

This is probably the most important international network so far set up. Headed by two brothers, Poon Tat Wah (George), who travels on a French passport, and Poon Tat Hong, a Hong Kong Resident, their activities stretch across the globe. They benefitted from the amnesty given by the CITES Secretariat to the poached ivory stockpile in Singapore in 1986. They are reported to have made over US \$7.5 million overnight. They have had factories operating in Dubai and Ajman, in the UAE, run by George Poon, as well as operations in Hong Kong, Taiwan, Macau, France and Singapore. They control the entire trade from the purchase of raw tusks to the sale of jewellery to the public, maximising profits.

George Poon sets up businesses all over the world. He registered the Dubai companies and runs the Ajman factories in the UAE. He lives in Paris with his wife and baby, but is rarely to be found in his Paris apartment above the ivory shop. Besides dividing time between Hong Kong, the UAE and Paris, he has been to inspect confiscated ivory in Tanzania, owns shares in the family's Singapore 'Fung Ivory Factory' and a Singapore investment company set up in 1988 called 'Tat Hing Investment', attempted to set up factories in Zaire and Congo, bought ivory from the Kruger National Park in South Africa, and recently speculated in property in Vancouver and Toronto, Canada.

Poon Tat Hong is based in Hong Kong with shares in 'Tat & Co' and 'Tat Hing Ivory Wares Factory' in Hong Kong and Kowloon. He organises the import and marketing of the illicit ivory provided by his brother's activities. He is also a director and shareholder of 'Fung Ivory' and 'Tat Hing Investment' in Singapore.

Many other ivory businesses are owned or controlled by the Poons but are often fronted by associates. One such company 'Kyomi Ivory Factory' in Hong Kong is fronted by Choi Tak Hing, former manager of the Poons' 'Dubai Ivory Factory' and shareholder in 'Fung Ivory Factory' in Singapore. 'Kyomi' is said to have been the front used by the Poons to receive a 20% down payment from three Japanese ivory companies to buy ivory from Africa or from Dubai. Fellow shareholder Chan Chun Por fronts 'Min Hing Ivory', another Hong Kong company within the Poon family's influence.

121 ^{EXB} - 25026282		121 - 25026282	
Shipper's Name and Address M.K. JEWELLERY FACTORY, P.O. BOX 16792, DUBAI, U.A.E. C/O GULF EXPRESS FREIGHT.		Shipper's Account Number Not negotiable Air Waybill (Air Consignment note) Issued by BRITISH CALEDONIAN AIRWAYS LIMITED Caledonian House, Crawley, West Sussex England, United Kingdom RH10 2XA Member of International Air Transport Association 	
Consignee's Name and Address MR. CHAN LIM TO 28 SHAN TUNG STREET, G/F, KOWLOON, HONGKONG. TEL: 3-886077.		Consignee's Account Number It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.	
Issuing Carrier's Agent Name and City DNATA, DUBAI		Accounting Information I:O : 20173/88.	
Agent's IATA Code 86-4-7291		Account No	
Airport of Departure (Addr. of first Carrier) and requested Routing DUBAI			
to HKG	By first Carrier RR	to HONGKONG.	Currency ADH
Airport of Destination HONGKONG.		Flight/Date For Carrier Use only / Flight/Date	Declared Value for Carriage NVD
Handling Information 6 CTNS/ADDR. CU. TOM NO 020370. PLS NOTIFY ON ARRIVAL. FTZ 710 DT. 21-3-88.			Declared Value for Customs LOC : BRW.
No. of Pieces RCP	Gross Weight	Rate Class Commodity Item No.	Chargeable Weight 183.0
			Rate AS AGREED
			Total
			Nature and Quantity of Goods (Incl. Dimensions or Volume) BONE BEAD AND IVORY JEWELLERY AND CARVINGS. DIM: 17x10x15"/6

Airway bill showing ivory from Dubai consigned to Chan Lim To at the address of 'Africa Hydraulics'.

EIA has followed shipments from Dubai to Belgium, Germany, Singapore, Hong Kong, South Korea and Taiwan. Even before Hong Kong required permits for 'worked' ivory imports in August 1988, the Poons were importing semi-carved ivory from Dubai via Singapore to two 'cover' addresses belonging to Chan Pik Wah and Chan Lim To. The semi-carved ivory was traced from the UAE to 'Keimi Ivory Factory', one of the Poons' many factories in Hong Kong. **The Poons have always been steps ahead of the CITES system, hedging their bets and providing themselves with maximum opportunities for the future. By opening up a network of routes, any seizures have a minimal effect on the empire.**

The Poon family operation includes other members of the family including the brothers' father Poon Chu, a director and shareholder of 'Tat and Co'. Other family members include Poon Moon Kee, Poon Tze Hi, Poon Chi Kong (Sam) and Poon Chi Naug (Danny). Between them they own dozens of companies and have vested interests in dozens of others. They are involved in some legal ivory dealing as a way of laundering poached ivory into the system. As financiers of ivory operations outside the CITES system they have a very extensive and powerful network.

The Lai Family



Lai Yu Key runs 'Sun Cheong' in Singapore for the Lai family.

THE LAI FAMILY

Headed by Michael Lai, a Hong Kong resident, they own 'Kee Cheong Ivory Factory', 'Yat Cheong Ivory Factory' and other interests in Hong Kong. The family set up 'Sun Cheong Ivory Industries' in Singapore before it joined CITES and shipped large imports of poached ivory. They owned large quantities of the 1986 registered stock. Lai Yu Key, Michael Lai's nephew who carries a British passport, admitted in an interview in March 1989 that they set up in Singapore to "avoid CITES". They have since exported most of this poached ivory to themselves at 'Kee Cheong' and 'Yat Cheong' in Hong Kong (about 30 tonnes), as well as 12 tonnes to 'Kitagawa' in Japan and 4.5 tonnes to the Poon's 'Tat Hing Ivory Wares Factory' in Hong Kong.

A number of sources have named Michael Lai as being involved in trafficking ivory through Dubai for the last few years. The Dubai operation sent ivory to Taiwan and Hong Kong, much of it destined for Japan. Poon Tat Hong has stated that Lai works with Chan Pui Ming in Dubai and that in the first half of 1988 they had 30 tonnes of raw ivory made into 180,000 ivory seals in Dubai and sent to Hong Kong destined for Japan.

The Lai family have been rumoured to be connected to both the Poon family and K.T. Wang, and some sources suggest that Wang is the true head of this operation. It seems more likely that Lai has co-operated with all the other main illegal dealers whenever it was mutually beneficial for them to do so.

In 1988 Kee Cheong donated a large sum of money to the CITES Secretariat.

'Kee Cheong' and 'Yat Cheong' have both exported raw ivory to Thailand, Germany, Malaysia, the USA, Japan and Taiwan. They both operate from the same building as 'Poon's Ivory Factory' and 'Yan Kee Ivory', a company associated with imports of poached tusks to Macau.

K.T. Wang (Wang Kuo Tong)

K.T. WANG (Wang Kuo Tong)

Known as the Godfather of the illegal trade, this businessman is a Hong Kong Resident and was involved in shipping hundreds of tonnes of poached ivory in the last fifteen years. He has strong connections with French speaking African countries developed while working for 25 years with French diplomats and for the French Consulate in Hong Kong. He trades in other commodities, often bartering Chinese goods for ivory in Africa. His powerful position was considerably strengthened by the amnesties applied to poached tusks during the 1986 registrations.

His Hong Kong company 'Hua Fung Trading' received the bulk of his Singapore stockpile believed to be in the region of 150 tonnes. Japanese companies such as 'Kitagawa' and 'Takaichi' also received amounts in excess of 20 tonnes. He is said to have an interest in Burundi stockpiles. His ivory often passes through Belgium. He has business arrangements in all these countries.

Form AR (I) Continuation Sheet 7

**12 PARTICULARS OF THE DIRECTORS, SECRETARIES,
MANAGERS AND AUDITOR(S) OF THE COMPANY
AT THE DATE OF THE ANNUAL RETURN**

**FORM
AR (I)**

Name of Company. **CHATELET TRADING PTE LTD**

Company No: **01878/1984-C**

The particulars of the directors of the abovenamed company are as follows (Please use Continuation Sheets if space provided is insufficient):

(1) (a) Name: **WANG KUO TONG**

(b) ~~HONG KONG~~ ^{HONG KONG} Passport No: **01956** Nationality: **HONG KONG RESIDENT**

(c) Residential address: **116 ARGYLE STREET, C1 KOWLOON, HONG KONG**

(d) Designation in the abovenamed company: **DIRECTOR**

(e) Date of appointment: **MAY 22, 1984**

(f) Occupation: **COMPANY DIRECTOR**

(g) Particulars of other directorships in public companies or subsidiaries of public companies incorporated in Singapore (Please use Annexes if space provided is insufficient): **N.A.**

Document showing K.T. Wang as director of 'Chatelet' who owned the lion's share of the Singapore registered stock in 1986.

He states that he is chairman of 'Compagnie Franco-Chinoise de Commerce', whose co-director is Jacques Lewcovitz, the owner of 'Societe Nouvelle France Croco' (SNFC), an ivory and skin trading company with a web of contacts throughout Africa, Belgium and France. He has often been named in illegal deals. Wang also owns 'Hong Kong & Macau Traders'.

In the 1970's Lewcovitz and Wang were the most influential ivory traders in Belgium and France, handling hundreds of tonnes of poached tusks mainly from Congo, Zaire and the Central African Republic. They were responsible for fuelling the heavy poaching at that time and are heavily implicated in the African elephant disaster.

Wang's relationship with Lewcovitz is a very important one because SNFC is still very active. A Belgian company, ABF, recently bought 16 tonnes of confiscated ivory from Tanzania which was destined for Lewcovitz. Wang's involvement is unknown, but having been involved in business with Lewcovitz, it seems likely that they still co-operate.

Wang's companies have traded raw ivory with the other syndicates, and he started trading poached tusks with 'Yan Kee Ivory' through Macau. He is reputed to still own some of the Singapore stockpile having held it back from the market. In 1988 he donated US \$20,000 to the CITES Secretariat.

Other Traders

OTHER TRADERS

The business dealings between the Hong Kong traders are complex and certainly impossible to completely unravel. However, it is known that many other traders operate within these syndicates and sometimes operate unilaterally.

In Taiwan, William Chan receives Dubai ivory at his company 'Advance Jewel'. He has a business in Hong Kong and operates his own network of contacts. Once supposed to have been closely linked with the Poon syndicate it now seems that he works with the Lai family.

Chan Ka Keung, not believed to be related to William Chan, has boasted of his Zairean factory carving ivory with Hong Kong and African labour.

The working week

'Sunday Morning Post'
Aug. 28th 1988, Hong
Kong.

After an apprenticeship in the ivory-carving trade, Mr Franky Chan Ka-keung set up on his own account, and now has six factories – including one in Zaire – and two shops. But his company, China Arts, is being dealt a blow by strict regulations governing the import of elephant tusks. The result will be redundancies among his skilled craftsmen, as he explains to
MARIANA WAN

Other companies have received ivory from the stockpiles including 'Tai Yip' and 'Shui On', companies that trade a great deal with Japan. 'Shui On' has been named as being involved in illegal trading.

Mainly dealing with South Africa, 'Rand Corp' based in Hong Kong is the Pong family's company receiving ivory from 'A.H. Pong & Co' in Pretoria run by Chong Pong, his son.

WORKED IVORY

Hong Kong imported enormous quantities of worked ivory from the factories carving poached tusks in Macau, Taiwan, Singapore and the UAE. The fact that worked ivory was considered too difficult to monitor was (and remains) a major flaw in the CITES system. It provided a perfect loophole for traders to exploit. At the CITES meeting in Ottawa in 1987 the Hong Kong delegates on the UK delegation strongly argued against requiring permits for worked or small pieces of unworked ivory even though this loophole was clearly being exploited at that time by Hong Kong traders.

In the last three years a large proportion (40% of



Semi-carved ivory from the UAE being finished in one of the Poons' Hong Kong factories.

declared value) came from these sources. It is likely that due to under-declaration, smuggling and the lower value of the mass produced items (seals, bangles, beads, etc) compared to the intricately carved tusks from China, these countries supplied most of the carved ivory imports.

The Hong Kong Government belatedly attempted to stop the flood of worked ivory into Hong Kong by requiring CITES import permits for worked ivory from August 1988. However, it is clear from interviews with traders in different parts of the world that most worked ivory produced in these countries is still destined for Hong Kong by one route or another. In taped interviews with dealers and workers in the UAE between February and May 1989, Hong Kong was named as a major destination for worked ivory.

- On 4th May 1989, Simon Li, manager of 'Belhon Trading' in Dubai admitted "we finish the semi-finished products here and the finished product will be finished in the other factory...in Hong Kong or Taiwan..."
- On 6th February 1989 Abdulla Yamvi, employee of 'Al Redha', the major ivory dealers in the UAE, said the worked bangles, earrings and necklaces were exported to "Europe,...Paris and Hong Kong."
- On 7th February 1989 a Bangladeshi worker from 'Coral Jewellers' in Ajman admitted the carved ivory was "going to Hong Kong."

These shipments are unrecorded in Hong Kong, but even after the change in law in August 1988, customs statistics do show imports from the UAE in October 1988.

Hong Kong still does not require CITES export permits for worked ivory.

JAPAN - THE WORLD'S LARGEST IVORY CONSUMER

Not an innocent bystander

In Tanzania on August 9th 1988, it is said that Suleiman Haji of 'Mohamed Enterprises Ltd.', Dar Es Salaam, was filling in the shipping documents for tonnes of ivory consigned to Mishizawa Ltd., Osaka, Japan. It seems that he carefully filled in the cargo details as "pigeon peas" - once again concealing from the customs and CITES statistics the true extent of the international ivory

trade, and once again contributing to the African elephant disaster.

Despite joining CITES in November 1980, Japan's imports of ivory throughout the 1980's have been closely associated with Hong Kong and poached tusks. As the world's largest consumer of ivory, Japan provides a home market, largely for seals (64%) which once manufactured are impossible to identify with a particular tusk. This means that ivory smuggled into Japan can be carved and sold on to the domestic market removing any of the restrictions (and therefore risk) imposed on re-export.



Seals or 'Hanko' account for 64% of the 'worked' ivory sold in Japan.

The trade links between Japanese traders and the Hong Kong syndicates are cemented by years of co-operation. Between 1981 and 1986 CITES statistics show that over two thirds of Japan's reported raw ivory imports came from Belgium and Hong Kong, with Belgian re-exports to Japan peaking just **before** Belgium joined CITES. In a similar demonstration of Japanese traders' willingness to receive poached tusks, over 250 tonnes of raw ivory was rushed into Japan from Portugal, Singapore and the UAE in anticipation of new restrictions.

The African elephant disaster was well advanced by the time Japan attempted to bring its ivory traders under control. Besides developing their links with the Hong Kong trade, the Japanese imported the large tusks from Congo, Zaire, Central African Republic and Sudan - notorious for their poached ivory. Even today, the Japanese industry seeks out the larger tusks, depriving the remaining elephant herds of the older mature bulls so necessary in the normal breeding patterns of the herds.

The flow of ivory has not always been into Japan from Hong Kong. The Japanese trade have played their part

when international attempts to control their activities have threatened. Between 1983 and 1985 Japanese traders laundered poached tusks through their weak system to provide ivory for the Hong Kong trade. Whenever a loophole has been seen to exist Japanese and Hong Kong traders have together exploited it.

Japanese permit data shows that between 1986 and 1988 over 80% of raw ivory imports were from Hong Kong, Singapore and Belgium. The Singapore trade is virtually monopolised by the same Hong Kong traders who benefitted from the 1986 Singapore registration/amnesty. The Belgian trade is also run by individuals connected to the Hong Kong trade with a past record of poached ivory imports long enough to convince any sceptic of their unreliability.

Worked ivory imports largely come from Hong Kong, although as if to emphasise the illegal origin of much of this, after the August 1988 restriction imposed in Hong Kong, a sharp increase in worked ivory imports from Singapore was experienced. Both Hong Kong and Singapore are major laundering centres for worked ivory from the factories of the UAE and other illegal sources.

The main Hong Kong companies that have provided Japan with its ivory in the last three years are:

Tai Yip Trading Co.	Main buyer of Singapore registered ivory.
Rand Co Ltd.	Pong company, dealing out of South Africa.
Kee Cheong	Lai family, working out of Hong Kong, Singapore, Taiwan and the UAE.
Yat Cheung	Lai family, working out of Hong Kong, Singapore, Taiwan and the UAE.
Master Trading	Poon 'front' company (see 'Hong Kong').
Tat Hing	Poon company - Hong Kong and France.
Hua Fung	Wang's company (see 'Hong Kong').
Bold Lad	Poon 'front' company (see 'Hong Kong').
Shui On	Chan company - known to have dealt with Burundi dealers.
Hollander	Buy from Somalia, Mozambique, South Africa and Zambia.
Kwong Fat Cheung	A main buyer of Singapore registered ivory.

Accusations against the Japanese ivory trade have come from Hong Kong traders aware of the relationship between the Hong Kong syndicates and major Japanese companies. Dominic Ng of 'Nathan Ivory', stated "I am sure that all the Dubai dealings were backed by the Japanese. They used Hong Kong traders as front men who got the blame when things go wrong."

Another Hong Kong trader said that the Hong Kong traders worked in different groups and were supported by Japanese trading companies such as 'Kitagawa Ivory Company', 'Nippon Ivory' and 'Vendome Jewellery', a

chain store. He claimed that 'Kitagawa' put down a 20% deposit for every order and Poon Tat Hong would use the down payment to buy ivory from agents in Zaire or Tanzania, or from Bamakramah of 'Al Redha' in the UAE. Dominic Ng added that "the Japanese paid the money and they did not want to know how the ivory go into Japan."

Poon is said to have representatives acting as his agents in Japan but working for two Hong Kong based companies. The agents are named as Mr Loo who works for 'Kyomi Ivory' and Mr Yau from 'Bold Lad'.

ZIMBABWE - POACHING AND THE ILLEGAL IVORY TRADE

In September, 1989, the Government of Zimbabwe made a formal request to the US Agency for International Development for additional funding for anti poaching work because "we are not keeping pace with the poaching." It is also known that the Wildlife Department of Zimbabwe is under investigation by the police.

At the same time, Zimbabwe and South Africa are leading efforts to oppose an international ban on the ivory trade. A document drawn up by Zimbabwe, representing "several southern African nations" seeks to keep elephant populations for the entire southern part of the continent including states not supporting the position paper, on Appendix 2, in order to maintain a legal international ivory trade.

We review the situation concerning elephants, poaching and illegal ivory trading in these countries and show how their proposals would cause the African elephant disaster to move into another more critical and dangerous phase.

Poaching in Zimbabwe has followed the classic pattern established in countries to the north. All around Zimbabwe's borders, elephant poaching has shown its ugly face: in the Zambezi Valley, the Hwange National Park and Matetsi complex.

Rowan Martin admits (1989) that "in the past two years the escalation of illegal hunting for ivory within Zimbabwe is very noticeable. As elephant populations decline in countries to the north, the pressure on elephants is expected to intensify."

The carcasses of 1,000 poached elephants presently litter the Gonarezhou National Park, on the border with Mozambique, accounting for almost a quarter of the Park's (1987) estimated population of 4,500 elephants.

Rowan Martin is leading the Zimbabwe Wildlife Department in an attempted cover up of the situation in Gonarezhou, because it shatters Zimbabwe's claims in support of keeping its elephant populations on Appendix 2. An Appendix 2 listing will result in the extermination of the Gonarezhou populations, before the poachers move more heavily into the Zambezi and Hwange.



Rowan Martin claims that "our elephants start to breed at the age of seven and give birth at nine years!"

The Gonarezhou disaster proves that the power of the Hong Kong ivory syndicates and their never ending demand for ivory will stop at no border in Africa as long as there is a legal ivory trade to launder their poached ivory into.

The unprecedented poaching in Gonarezhou of both elephant and rhino has grown progressively more intensive in the last year. For this reason, Zimbabwe's latest count of elephants in Gonarezhou, will not identify the live animals to dead carcass ratio which is normal

procedure in such counts. The Wildlife Department is terrified that news of the poaching crisis in Gonarezhou will leak out and undermine their efforts to oppose an ivory ban.

Inquiries confirm that the poaching is being carried out by Zimbabwe paratroopers, apparently attached to the "Red Berets", formerly known as the infamous Fifth Brigade which was trained in North Korea. The distribution of the 1,000 carcasses clearly indicates that intensive poaching is occurring from the Zimbabwe side. Only the Park staff and the Zimbabwe army are in a position to undertake poaching on this scale in the areas where the carcasses are found. The warden of the Park is said to be implicated in the poaching of elephants and the illegal trade in their ivory. He is known to be a powerful and feared man with many influential friends in Zimbabwe and people are afraid to speak out against him.

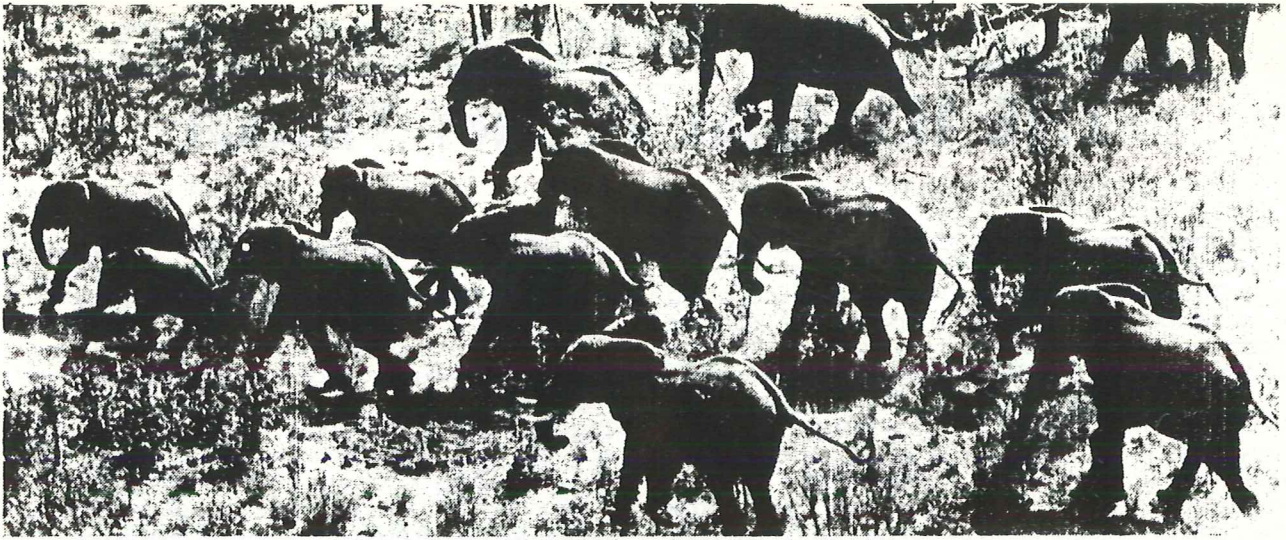
Reports of the poaching crisis in Gonarezhou surfaced in numerous places about a year ago, including in the "Zimbabwe Wildlife" magazine in December, 1988. The Society which published it states that it is "genuinely distressed by stories of heavy poaching and the apparent mysteries surrounding it". They state that "something very nasty has been happening in the park".

The Red Berets have been in the area for some time as they play a primary role in fighting Renamo (MNR) along the border. The MNR, who are supported by South Africa, have been fighting a vicious civil war in which they have killed some 100,000 Mozambique citizens. They have also been killing many elephants in the Gonarezhou.



Zimbabwean Red Beret paratroopers implicated in poaching.

The names of several senior ministers tend to be mentioned in connection with elephant poaching and the rhino horn trade. If their involvement is true, it provides a further insight into Zimbabwe's opposition to a ban on the ivory trade. If the trade is banned, who would buy the poached ivory from Gonarezhou?



The elephant population in the park appears to be diminishing.

Poachers jeopardising the future of Gonarezhou

GONAREZHOU, Zimbabwe's second-largest and most diverse national park, is felt to be in great jeopardy if the alleged excessive poaching continues.

stantial weights of ivory. It also has populations of mammals uncommon to other parts of the country, including the nyala and suni, and is known for its

ivory, has posed a number of questions surrounding the situation in the park.

With the current security oper-

difficult to obtain. The cause of Kabakwe's death is unknown and the ivory has never been recovered. The elephant's death has been

'Financial Gazette', Zimbabwe, Jan 13th 1989.

THE NORTH KOREAN CONNECTION

The North Korean connection with the Red Berets is an important one as the North Korean embassy staff in Harare are deeply implicated in the illegal ivory and rhino horn trade. The Daily Telegraph of London reported as long ago as 1985, details of the embassy's involvement. The Telegraph notes that it was one of many illicit activities which North Korean embassies undertake because their embassies have to be self financing.

North Korea provides military training to the Zimbabwe army, including its elite regiments, and also sends medical teams to outlying areas. Young intelligence agents are also sent to Zimbabwe to learn English and gain experience in a more western style of society. The combined North Korean presence provides an extensive network of contacts for the embassy in its rhino horn and ivory trading activities.

In 1988, one shipment of 150 lbs of rhino horn is known to have left the country, sent by the North Koreans. But the North Korean connection stretches back to the time of independence. At that time the North Korean embassy in Lusaka was the centre of the rhino horn collecting.

In 1981, 5 North Koreans were apprehended at the Chirundi border post en route to Zambia with 5 rhino horns and an elephant tusk. The Koreans claimed diplomatic immunity so the horn and ivory were not recovered.

Even after the Zambian rhino was poached out, Lusaka was the main collection point. But ever since the advent of heavy poaching on the Zimbabwean side of the Zambesi, the North Korean embassy in Harare seems to be the primary smuggling centre for rhino horn.

Virtually the entire staff of the diplomatic missions of North Korea in these two countries are involved in the illegal rhino horn trade. Horn is brought from Lusaka to the Harare embassy and is then sent by diplomatic bag to Addis Ababa and from there to South Yemen.

Some 70 to 80% of the rhino horn traded by the North Korean embassy in Harare is said to originate from rhinos killed in Zimbabwe.

In 1986 KIM TAE SONG, a former commercial attache sent 40 kgs of horn from Harare to Pyongyang. He is also known to have purchased another 30 kgs.

In 1987, KIM MIIN SAN acquired a large amount of rhino horn and travelled to North Yemen soon after to sell it.

KIM SON GOK and LIM TAE DOK went to Lusaka to buy rhino horn and LIM TAK BOK flew to Yemen soon after to sell it. KIM SON GOK later travelled to Lusaka to collect more poached horn. LIM TAE DOK was offering \$14,000 for 2 horns from the same rhino or \$2,500 for individual rhino horns.

In October, 1987, some pressure was put on the Korean diplomats in Harare in an attempt to stop them from carrying rhino horn to Yemen. They responded by using couriers from North Yemen to come to Zimbabwe to collect the horn on two occasions in late 1987. But at the end of January, 1988 LIM TAE DOK met a Yemeni official in Addis Ababa.

IL CHAN IK was trying to buy rhino horn from a Korean doctor in Chimoyi in January, 1988.

CHONG IN SONG, a third secretary at the North Korean embassy in Harare attempted to recruit a rhino horn poaching team and said he was willing to finance and equip a 5 to 8 man team to poach in Mozambique or "anywhere they like". He is said to have obtained 10 rhino horns from an unnamed National Parks official in 1988. He is also suspected of bribing government and party officials.

The North Koreans have now turned to smuggling ivory as the supplies of rhino horn dwindle.

The strong political ties between North Korea and Zimbabwe demonstrate the difficulties of combatting poaching when senior foreign diplomats are involved. As the rhinos become more depleted, such diplomatic poaching is more likely to turn to elephants.

Hwange National Park and the mismanagement of elephants

Zimbabwe boasts that it has the best elephant management programme in Africa, but refuses to allow anyone outside its own wildlife department to review the data upon which it bases its estimates and consequent management decisions.

Martin claims that the elephant population of Hwange increased from 13,000 in 1987 to 21,600 in 1989. The estimate treats the many thousands of animals migrating in from Botswana as resident animals. The movement of elephants from Botswana into Zimbabwe was confirmed by radiocollar tracking.

In 1987, Dr Cumming, of the Zimbabwean Wildlife Department, stated "During the 1950's when there was a major development programme in eastern Botswana, there may have been a large movement of elephants into the parks at that time...which would have shifted numbers up to the higher level which tied in with our later and more accurate estimates." The question of present immigration was avoided.

The six year drought which has plagued Botswana's northern regions where most of its elephants occur is paralleled by the increased provision of artificial watering points in Zimbabwe's Hwange Park.

The historical migration route of the elephants took them to the Gwai River which is now blocked off by communal lands. Elephants get shot if they roam outside of the Park onto the communal lands. The watering points are apparently intended to offset this access to their natural watering place. The provision of the watering points may in fact be attracting increasing numbers of elephants from Botswana, explaining Zimbabwe's "rapidly increasing" elephant population.

Concerning Hwange, Martin comments that "In Hwange National Park... the current culling programme entails reducing the population from some 18,000 to about 13,000 to achieve this density. **The problem is further complicated by an uneven distribution within the Park caused by water availability.**"

The validity of such counts and the potential enormity of error - especially without any kind of peer group review is worrying. Are extrapolations being made of elephants in higher density areas around watering points to give a higher density across the Park's territory?

The uneven distribution of elephants around watering points raises a further concern. Assuming that credible long term vegetation monitoring programmes are the basis for such claims, the possibility exists that such monitoring around select areas, ie waterholes - where elephants have a higher density, is extrapolated to predict greater impact than exists. No published studies have been produced to back Zimbabwe's claims that the elephants are beyond the carrying capacity of the available habitat.



Are extrapolations being made of elephant numbers in high density areas around watering points?

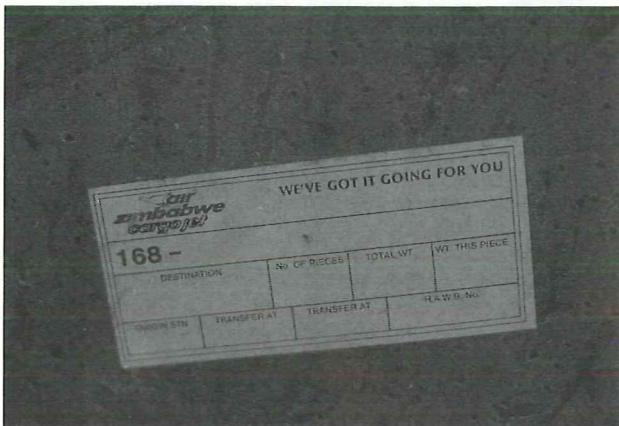
tation period of 15 months, a well-planned poaching campaign could win the rhino to extinction. What is even more worrying is the involvement of North Korean diplomats from both Lusaka and Harare; they are paying for rhino horns and shipping them out of Africa in diplomatic bags. Recently, game rangers in Zimbabwe caught North Koreans from Zambia red-handed, in possession of horn. The rangers were then reprimanded by their political overlords and instructed not to search North Koreans again, indicating that there may also be high ranking Zimbabwean involvement.

In Harare all this information has been carefully swept under various carpets, and I had to wait

Daily Telegraph,
17th August 1985.

In the Zambezi Valley, elephant poaching has steadily increased. Poachers seeking rhino are increasingly turning to elephants which are more available. The Zimbabwe Wildlife Magazine stated in March, 1989:

"In almost all areas where rhinos have been heavily poached, elephants have swiftly followed suit when killing rhinos becomes more difficult and elephants are widely distributed throughout the (Zambezi) valley. The elephants then effectively subsidise the killing of rhinos 'on the side' as and when the chance arises."



'Air Zimbabwe' sticker on crate outside 'Belhon Trading' ivory factory in Dubai in March 1989.

Tourists complain that culls and sport hunting have eliminated elephants in many areas they formerly occupied. In a letter to the London Times, on June 8th, 1989 a reader stated:

"Perhaps the National Parks in Zimbabwe could be persuaded to stop the annual culling of elephants and the selling of hunting camp leases in the Zambezi Valley. I am not a hunter but have visited a hunting camp in the Zambezi Valley for five successive years since 1983. Last year there was hardly any game to be seen at all compared with five years ago when many big bull elephants roamed the area."

The writer's sentiments are reflected by tourist operators who run tourist safaris from England to Zimbabwe. They confirm that elephants do not occur in many areas which they formerly occupied. The safari operators are concerned that the loss of elephants could negatively affect Zimbabwe's tourist industry if it became widely known that culling, poaching and sport hunting was wiping out their elephants.

There are indications that this may well be what is happening. In 1987, Dr Cumming, of the Wildlife Department stated:

"We quite obviously have not had all the parameters and done the full background of research before taking action. (ie killing elephants). Our **perception** has been in each case that there has been major environmental damage and that we needed to take action... You do not wait until you have got every last little bit of scientific information buttoned up..."

The "culling" programme takes no account of the fact that large numbers of the elephants are not resident animals - an obvious major flaw in their management of elephants. The same approach applies to the Zambesi population where elephants from Zambia swim across the river into Zimbabwe.

Zimbabwe's culling of immigrant elephants has generated much hostility in Botswana. Although the Wildlife Department has its own plans to cull the same herds of elephants that move into Zimbabwe, there is strong opposition within the government cabinet in Botswana to killing elephants.

Rowan Martin makes a big fuss about not being consulted before other African countries proposed Appendix 1 for African elephants. But what consultations has his department initiated with their counterparts in Botswana to address the issue of immigration? Or to discuss the potential impact of Zimbabwe's aggressive elephant killing programme on the Botswana population? None whatsoever!

Does Zimbabwe consult with Zambia before culling elephants in the Zambesi or before it allows sport hunters to shoot the big bulls that swim across the river? Absolutely not!

Martin also casts doubts on the scientific validity of elephant population estimates produced by scientists, which "are no more than guesses". Having had the opportunity to review the data upon which such counts are undertaken, Martin is entitled to his opinion.

But Zimbabwe refuses all requests for access to the raw data upon which it bases its own population estimates. The double standard of Zimbabwe's scientists criticising other scientific research while obsessively refusing access to Zimbabwe's data casts doubts on the credibility of Zimbabwe's public statements that its elephant populations are as abundant or increasing as they claim.



Zimbabwean delegation at the AEWG meeting in Nairobi, Nov 1988.

The sharing of information, data, and the scientific techniques, analysis and interpretations of such data is a normal part of the consultative process between scientists of one's own peer group working within the same field of studies.

The "culling" programme is a deeply unpopular slaughter in Zimbabwe, both with the public, the Parks and Wildlife staff, with tour operators and tourists. In July, 1984, it was suspended after the public outcry forced the government to act. If information became public that

the scientific validity of the "culling" programme was in question, Zimbabwe's Wildlife Department might have to reconsider the controversial and experimental programme devised by Martin.

But Rowan Martin doesn't like debate, or free exchange of information. His 1985 report refers to his visit to Kenya; "I found it a somewhat alien experience to be in a country where there are so many additional spokesmen (ie NGO's) on wildlife matters over and above the official government agency, and learnt that this frequently leads to embarrassment of the authorities. Such a state of affairs cannot aid conservation."

What happens when the Wildlife Department has collected its data?

Is a brief calculation performed on the back of an envelope to decide that in 1990, more than 4,300 elephants will be shot to death in Zimbabwe?

Do these calculations have any more validity than the recent killing of a bull elephant in Zimbabwe that was shot dead not because he was "excess" to the ecosystem, nor because he was the object of a day's delight for an ageing American hunter intent on displaying his masculinity in the true Hemingway style, and not because he was raiding crops, or hurting villagers, nor because he was part of the legalised poaching quotas, but merely because he was passing by a crocodile farm which had run out of food?

Road. in Zimbabwe, be persuaded
doing to stop the culling of
the in elephant and the selling of hunt-
ing leases in the Zambezi
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ay be

Whole families of elephant are
culled every year because it is
believed that by so doing it con-
serves the plant ecology of the area.

I am not a hunter but have
visited a hunting camp in the
Zambezi Valley for five successive
years since 1983. Last year there
was hardly any game to be seen at
all compared with five years ago
when many big bull elephants
roamed the area.

The hunter to whom the car
belongs has this year bought
another hunting area, which has
not been hunted for years, if ever.
The price: ZW\$300,000 - about

whom
cyclin
prov

Letter published in the London 'Times', June 8th 1989.

No one knows, because the wildlife department of Zimbabwe is shrouded in secrecy.

At the July 1989 meeting of the CITES African Elephant Working Group in Gaborone Martin made the remarkable statement that "Our elephants start to breed at the age of seven and give birth at nine years." The statement generated howls of laughter from other scientists in the room, as all other female elephants in Africa outside of Zimbabwe give birth at the age of 12 years.

But the situation facing Zimbabwe's elephants is not funny.

If Martin can be so wrong about such a basic biological fact; if he can ignore the mass immigration of thousands of elephants from a neighbouring country and count them as resident animals; if he refuses to provide basic data on elephant counts in Zimbabwe and refuses to enter into scientific debate, but remains totally critical of other scientists' published information; if he actively covers up the terrible elephant slaughter in Gonarezhou and is blind to the disastrous failure of CITES ivory controls, why should anyone believe the claims that Martin uses to justify Zimbabwe's efforts to oppose an ivory ban?

SOUTHERN AFRICA

THE PONG CONNECTION

In mid October last year, a major shipment of ivory and rhino horn was en route for South Africa's biggest dealer, Chong Pong. The vehicle, owned by Tony Viera from Johannesburg was registered in the "independent homeland" of Bophuthatswana and was driven by Patrick Mufumbi, a Zimbabwean. Viera received a message from Botswana that his truck had broken down and he borrowed Pong's BMW to meet the truck there.

The Botswana customs officials had intercepted Viera's vehicle at the Kazungula border with Zambia and had tricked him into coming there. Inside the truck, they found 382 raw ivory tusks, 34 carved tusks, 94 black rhino horns, 50 ivory bangles, 73 ivory necklaces, 10 pairs of earrings, 20 elephant sculptures, 10 items of malachite and a load of copper ingots. The shipment was worth at least \$1 million and had been transported from Pong's warehouse in Zaire and driven on a route through Zambia to Botswana - the same one the truck has used on the previous ten trips in the five months before the seizure.

Mr Pong had a cunning strategy that outwitted the Botswana customs and courts and allayed suspicions in South Africa. The ivory and rhino horn, he said, were not his - only the copper ingots. "I am an importer and exporter in the retail clothing business. If I were a smuggler, would I be so foolish as to put my real name on the consignment note?"

This brilliant ruse worked, for Mr Pong is moving about freely in South Africa, where he and his father A.H. Pong, who reportedly holds two seats on the Hong Kong stock exchange, continue their massive trade in illicit ivory and rhino horn.

Viera, the owner of the truck, was fined US\$2,000 and forfeited the truck. Viera had worked regularly for Pong, delivering his ivory and rhino horn from Zaire and Zambia into South Africa to one of Pong's companies; 'Rand Co. Ltd'; 'A.H. Pong & Sons' and 'Lattex', all located in Pretoria. Pong's 'Rand Co. Ltd', has offices in Pretoria and Hong Kong. The company's warehouse on the fourth floor of the Tack Building, at 43 Gilman Street in Hong Kong contains some 40 tonnes of ivory stockpiled. Some sources say that Pong has a stockpile of 1,000 pounds of rhino horn hidden away in Hong Kong. Other business concerns of the Pongs are located in Macau and Taiwan.

Johannesburg Sunday Times 16 October 1988

Ivory in truck: man arrested

of Mr Pong

R5M HAUL OF TUSKS AND HORNS WERE ON WAY TO PRETORIA

By DE WET POTGIETER
The Sunday Times exposé of a massive smuggling ring this week led to the interception of the biggest contraband haul in Botswana's history.

Now startling new information on the Pretoria link in the international chain has been uncovered.

This week, an incredible mass of illegal ivory and rhino horn, being brought through our neighbouring states to South Africa, was confiscated by Botswana customs officials.

Since the Sunday Times recently exposed the vast network that extends

across Africa, desperate smugglers have hurriedly tried to get rid of their stores of tusk and horn - before a clampdown by the authorities.

Early on Monday morning, the first major break came at the Kazungula border post between Botswana and Zambia, when customs officials found almost two tons of ivory and 94 black rhino horns being transported to Pretoria.

A prominent Chinese businessman, Mr Chong Pong of A H Pong and Sons in Pretoria, confirmed this was that the consignment note for the confiscated truck was made out in his name.

He added that he had previously had "legitimate" dealings in ivory but vehemently denied any knowledge of the contraband - worth well over R5-million - found hidden in a secret compartment in the custom-built truck.

Hidden

Concealed were 382 elephant tusks, 34 carved tusks, 94 rhino horns, 50 python skins, 2 leopard skins, 3 crocodile skins and 50 ivory bangles.

Also found were 73 ivory necklaces, 10 pairs of earrings, 20 elephant sculptures and 10 items of malachite.

From his Marabastad premises, Mr Pong said a load of copper ingots on the truck was due to be delivered to him.

"I am an importer and exporter in the retail clothing business. If I were a smuggler, would I be so foolish as to put my real name on the consignment note?" he said.

The Sunday Times investigation found that Mr Pong had brought 10 consignments of copper ingots through the same route at Kasane since July this year. Maia Transport and Avelar Transport were used.

Mr Pong confirmed this, saying he did not know who owned the contraband found on the truck. He added that he was worried about when his copper ingots would be returned to him.

It was also learnt that the owner of the confiscated truck - it is registered in Bophuthatswana - Mr Tony Viera of Yeoville, Johannesburg, borrowed Mr Pong's BMW to meet the truck in Botswana.

Said Mr Pong: "Tony came

to me on Monday and asked to borrow my car to go up to Botswana. Tony told me the truck had broken down and that his own car was out of order."

● Tony, Mr Pong believes, was lured into the country under the pretence that his truck had broken down. He was arrested by Botswana police at the Gaborone Sun.

Court

Mr Viera and the truck driver, Mr Patrick Mufumbi appeared in the Francistown Magistrate's Court on Thursday.

● The Zimbabwean driver had instructions to park the truck with the contraband next to a place called Cassim's near Pretoria's Asiatic Bazaar. The driver would then have been taken to a local hotel where he would have spent the night.

The next morning another fully laden truck would have been ready for him to take back.

● Soon after the Botswana authorities discovered the contraband, Transvaal Nature Conservation officials raided Mr Pong's premises.

It was also reliably learnt that Botswana and South African authorities have known of the contraband consignment bound for Pretoria for some time.

for some time.

Pong's family came to Johannesburg from Hong Kong in 1956 and has thrived ever since by exploiting his business links in Hong Kong and nearby countries with trade contacts in South Africa. Pong is by far the biggest dealer in rhino horn and ivory, although the illicit South African market for the products of these two endangered species is enormous.

Ivory and rhino horn smuggling are just some of the commodities Pong deals. Others include marijuana, whiskey, mandrax, malachite, tourmaline, aquamarine, amethyst, cobalt and of course copper. In the sanctions plagued environment of South Africa, smuggling and black market activity is a way of life, and Pong is one of the professionals.

He uses trucks with concealed compartments, produces forged documents or gets legal documents signed illegally, and pays lots of bribes to facilitate his illegal activity. In South African smuggling circles, his activities are well known and it is an open secret that Pong transports his ivory and rhino horn to Hong Kong by ship and by plane, marked as other goods like machinery, general cargo and so on. Chong Pong's father, A.H. Pong has substantial influence in Hong Kong through his position on the Hong Kong stock exchange. Although the Hong Kong authorities show little interest in the Pong's regular imports of ivory and rhino horn - as is the case with the entire infrastructure of the illegal ivory and rhino horn trade in the colony - it is always useful to have high level contacts if something should go wrong.

In the 1970's the Pongs would buy tusks that were legally sold by the South African government from the Kruger Park cull. The tusks were very small, so Pong would sell them off and replace them with much larger tusks from poached elephants. An official in the Transvaal permit office who was on Pong's payroll, would provide permits to allow the legal export of this ivory. In 1979, a son of Pong's, Law Kong Gee Pong of the 'Rand Co. Ltd', was reportedly prosecuted and convicted of illegal rhino horn imports originating from Botswana.

Johannesburg Star Oct. 12th 1988.

Ivory in truck: man arrested

The Star's Africa News Service

GABORONE - A man has been arrested at a Gaborone hotel following the seizure of a South African-registered truck carrying elephant tusks and rhino horn.

A police officer said the man was white but declined to identify him or say whether he was a South African national.

Police said the doors of the truck's engine compartment were open after it had crossed the Kazungula ferry from Zambia.

In addition to the tusks and rhino horns, customs officers found python skins, ivory bangles, malachite necklaces, bags of zinc and lead, video recorders and diesel engine parts. Some of the items were in concealed compartments.

The driver, a Zambian, told police he thought the truck was carrying scrap copper. He was detained for questioning but later released.

Police identified the owners of the truck as A H Pong and Sons, of Johannesburg.

The quantity and estimated value of the tusks and rhino horns was not immediately known.

The seizure of the goods followed reports of a thriving trade in smuggled ivory, rhino horn and python skins through South Africa from countries to the north.

The Kazungula ferry crossing over the Zambesi River is the major road link between Botswana and Zambia and Zaire.

It carries relatively heavy road traffic to and from South Africa.

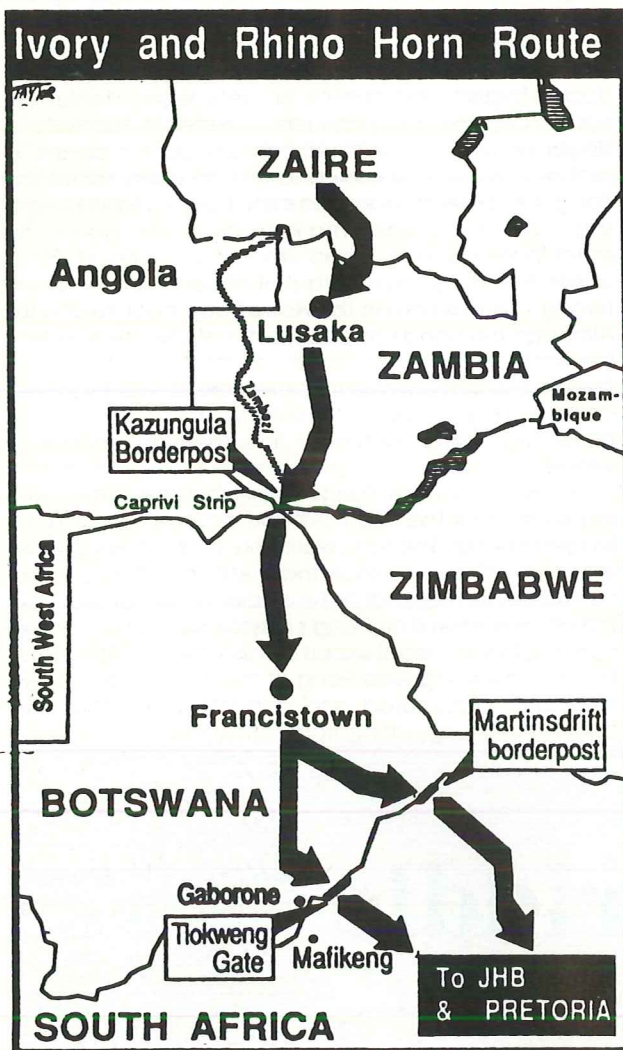
One of Pong's business associates started smuggling various goods for Pong in 1979, using two old chevrolet El Caminos. Then this associate moved into smuggling ivory, he was able to invest in a bigger truck. Soon after, a major shipment of four tonnes of ivory was sent to Pong in Zambian registered trucks, organised by Menelaos Constantinou, who operated 'Pafos Transport'. In 1986, A.H. Pong, Chong's father, shipped 230 kgs of horn to Macau in 4 different shipments.

A huge network of dealers, middlemen and transporters is available to Pong and other dealers in South Africa. Hans Beck, a major dealer in poached ivory has deliveries sent both to his Francistown factory in Botswana where it is carved as well as to his curio shop in Johannesburg.

Mulungeni and his driver Mulenga smuggle ivory from Kenya, Tanzania and Zambia and were helping Pong to move a shipment of rhino horn when the

Botswana seizure occurred in October, 1988. Pong, by matching the going price of \$800 per kilo for rhino horn offered by several Senegalese dealers in Lusaka, was competing with Burundi based dealers. A first shipment of 100 kilos was completed, but a second shipment of 28 horns was stalled because of the Botswana seizure. Pong is the main recipient of ivory from Botswana, which is a major transit centre for poached ivory from Zambia and Zaire. Pong also trades with the infamous Poon brothers and is said to buy "legal" ivory from 'Botswana Game Industries'. (BG)

The Pong's regularly advertise for ivory in a South African magazine called "Farmer's Weekly"
 "1. Ivory and Cattle gallstones required. Contact A.H. Pong & Sons. Tel: 012 - 26-6304 or 012-32304774
 2. Ivory - still paying the highest prices for raw ivory. African Game Skins, 121 Mckenzie Street, Brooklyn 0181, 012-468517."



A major breakthrough in the smuggling racket was made in Botswana two weeks ago with the seizure of a large truck and trailer stacked with more than R1 million in contraband which included 94 rhino horn and 382 elephant tusks, Mr J Ebby, head of investigations at Botswana's department of Customs and Excise, told the Saturday Star.

The truckowner, Mr Tony Vieira of Cyrildene, Johannesburg, and the driver, Mr Patrick Mufambi, of Zimbabwe will appear in court to face charges under the Customs and Excise act on October 28.

The confiscation of the smuggled goods is said to be the largest made in Botswana but, according to wildlife officials, it represents only the tip of the iceberg.

Members of the public have expressed outrage at the contents of the truck which, apart from the rhino horn and tusk, included three python skins, two leopard skins, three crocodile skins and 12 bags of cobalt which Botswana officials believe came from Zaire.

A VW engine, car radio, TV, video recorder and a bag of pepper were also found in the truck.

Mr Ebby said if the men were found guilty they could face two years in prison or a fine equal to three

...where
rhino,
elephant
are
blasted
to death

'Johannesburg Star', Oct. 22nd 1988.

After the Botswana seizure last year, Pong's premises at Marabastad were raided by a Transvaal Nature Conservation official. No details have been given of what they found and the case is said to be sub-judice at present.

It comes as no surprise that the Pong family has high level political protection from the South African authorities because he is involved in sanctions busting imports. Pong is said to import much needed computers from Japan and the People's Republic of China and is protected from investigation or prosecution by South Africa's wildlife enforcement authorities.

Pong's political protection is said to be provided by people close to Craig Williamson, a member of the Presi-

dent's Council, who is closely involved with the South African security services. Williamson is somewhat of a folk hero in the white Afrikaans community, having successfully infiltrated the African National Congress for a number of years in the 1970's. He emerged as South Africa's most successful spy.

Williamson is now deputy chairman of the Johannesburg based 'GMR Worldwide' a holding company used to arrange sanctions busting imports, especially oil. Oil is shipped from the Middle East in Norwegian tankers with the stated destination being the Seychelles but the tankers deliver the oil to South Africa. Citrus fruits are also exported through 'GMR's' network of companies. 'GMR' is also said to control various small airlines, such as Air

Lesotho which flies to the Seychelles.

One of 'GMR's' companies is the 'Longreach Security Company' which shared the same offices as 'GMR' until 1987 and has an office in the Channel Islands. Established in 1986, 'Longreach' has a number of directors with dubious backgrounds, including Anthony "Ant" White, a former member of the Rhodesian Secret Services. White spent much of his time as an agent of Rhodesia in Zambia. In 1980, White was part of a group that raided into Lusaka in an attempt to assassinate then guerrilla leader Joshua Nkomo. They blew up Nkomo's house, but hadn't realised that Nkomo was out of the city at the time of the raid.

White is an important figure in the illegal ivory trade and has been smuggling ivory into Mozambique from Burundi. Just before the 1987 coup, White arranged for a major shipment of ivory to be flown out of Bujumbura to Beira, Mozambique on a private airline called 'Trans Afrik'. Known as a smugglers' airline, it is based in Sao Tome.

'Longreach' has a close relationship to A.H. Pong, Williamson and the other directors provide cover for Pong and make sure he escapes prosecution if Pong is caught with ivory or rhino horn.

Since Pong's warehouse was raided almost one year ago, there has been no word of any prosecution against him. His activities are a source of concern to many dedicated conservationists in the country.



100,000 elephants have been killed in Africa each year for the last 10 years because of the ivory trade.

Pong is so confident that South Africa and Zimbabwe will convince the 1989 meeting of CITES to continue legal ivory trading by allowing southern African elephant populations to remain on Appendix 2, that he recently boasted to colleagues that "In 1990, I will control the world's ivory trade." Pong appears unconcerned by the increasing publicity that he is attracting in South Africa. He is said to carry a gun in a shoulder holster as well as an "ankle" gun.

However, in early August 1989, a shipment of 106 tusks weighing 673 kg and 1 rhino horn was seized by Cape Town police. It was being delivered to a Taiwanese citizen, Michael Chen who said it was sent to him by a person in Johannesburg who wanted the ivory sent to Hong Kong. The police say the network behind the ivory shipment operates internationally and have asked their counterparts in Hong Kong to investigate the proposed recipient.

The address on the crates holding the ivory was 12 Tugela Crescent, Gallow Manor, Sandton - an exclusive suburb of Johannesburg. A man from Hong Kong, called Mr Lang claimed to be house sitting there for the past month. He claimed to not know anything about the owner of the house.

The house is believed to be owned by Mr Pong and the court case is scheduled to be heard in late September.

South Africa

South Africa is the undoubted regional superpower of southern Africa - politically, militarily and economically, it dwarfs the resources and capabilities of its neighbours and has been in a virtual state of war with half a dozen of them since the mid 1970's when Angola and Mozambique obtained independence, followed by Zimbabwe. With Namibian independence apparently close to hand, a political agreement at hand in Angola, and the Mozambique government still entwined in a bitter civil war, it is no wonder that the poached ivory and rhino horn trade have proliferated in and through the country.

SA is main outlet for smuggled ivory

By DAVID CRARY, JOHANNESBURG, Wednesday
Big-time smugglers, capitalising on South Africa's openness for international trade, are using the country as a major transit point for rhino horns and ivory. The rhino horns are being smuggled from the Far East, usually in the form of small, light-weight shipments, or in larger quantities from the Far East. The rhino horns are being smuggled from the Far East, usually in the form of small, light-weight shipments, or in larger quantities from the Far East. The rhino horns are being smuggled from the Far East, usually in the form of small, light-weight shipments, or in larger quantities from the Far East.

Mr Edmond Bladon, a Johannesburg-based expert on the ivory trade, says the biggest demand for rhino horns is in Taiwan, which has close economic and political ties with South Africa. He says that the demand for rhino horns is in Taiwan, which has close economic and political ties with South Africa. He says that the demand for rhino horns is in Taiwan, which has close economic and political ties with South Africa.

Mr Lester and his colleagues say South Africa and foreign conservationists are collaborating in operating vast international smuggling rings. They are among the savagely rich, who have played the main role in ending Africa's rhino population from about 100,000 to 4,000 and the elephant population from 1.7 million to about 400,000.

Mr Lester said customs workers at Jan Smuts airport are expected to have proper permits for high-value goods. He said, customs officials, checking incoming goods from neighbouring states are anxious to find weapons and explosives that elephant tusks or rhino horns.

Also, in a bid to encourage regional trade, South Africa has a customs agreement with several of its neighbours which results in undesignated goods entering without some containers pass through South Africa without ever being inspected.

"We've developed a good network of trading because of our political isolation," said Mr Lester. "We've been used by smugglers who have found a convenient way of doing business with a good degree of safety."

A major problem, Mr Lester said, is light penalties for smugglers who face no more than a \$500 fine if found in possession of contraband rhino horns. "It's an easy option for a crook," he said in an interview. "The penalties are a fraction of what they'd be for drug smugglers."

Parliament is considering legislation that would increase the maximum penalty to a \$400,000 fine - 15 years in prison. The extent of ivory smuggling in South Africa is shown in statistics reported recently in a document by the state-run South African Broadcasting Corporation. That emphasised the scope of the problem.

It said 50 tonnes of ivory was stored from South Africa last year, accompanied by 100,000 S.A.R. permits. However, the S.A.R. permits are issued to be accounted for officially, so South Africa's ivory trade could be from elephants killed in a large number of programmes at the Kruger National Park.

A South African environmental group - the Conservation, Environmental and Animal Welfare Consortium - alleged last year that South African military had helped smuggle ivory. The group said it had found ivory in a market intended to provide South Africa with foreign exchange. The ivory was said to be from South Africa's own elephants.

A South African board of inquiry revealed a range of illegal military involvement in Angola and the arms deal. The board said that the arms deal had been a major factor in the South African's involvement in Angola.

Two South African arms dealers were among six people indicted last year in connection with the arms deal. The indictment was filed in 1988. The indictment was filed in 1988. The indictment was filed in 1988.

Referencing all those involved in smuggling, Mr Lester was highly critical of the role of South African officials in the ivory trade. He said that the role of South African officials in the ivory trade is highly critical of the role of South African officials in the ivory trade.

While we have a high level of protection in the world's richest countries, South Africa's conservationists have destroyed our reputation and our pride. They have to be stopped. (AP)

'Daily Nation', Kenya, April 27th 1989.

Ivory traders exploit a major loophole which exists in the customs union that South Africa shares with Botswana, Swaziland, Lesotho and Namibia to import shipments of poached ivory from neighbouring states. Once a container is inside the customs union, it cannot be opened, thereby depriving wildlife enforcement authorities the opportunity to intercept such consignments. Besides for the porous frontiers of the Namibian border, Botswana, Swaziland and Lesotho are weak points through which traders move poached horn and ivory. Taiwanese businessmen have been encouraged to invest in the "independent homelands" of Ciskei and Transkei and are suspected of using these business links to send illicit shipments to Taiwan.

The trade in ivory and rhino horn serves a number of useful functions for the white minority regime which runs the South African state: poaching is a part of an overall destabilisation strategy aimed at paralysing the economic and political development of governments in the countries stretching in an arc to the north - Angola, Mozambique, Zambia, Tanzania and to a lesser extent, Zimbabwe and Botswana.

The impoverishment of these countries through the destruction of their wildlife resources diminishes their potential economic independence in the medium to long term. They are therefore more likely to fall into the economic orbit of South Africa's powerful economy. The prevailing poverty in the black frontline states and the willingness of senior politicians and party officers to act as controllers of the illicit ivory and rhino horn trade in their countries plays into the hands of the South African strategy and facilitates the achievement of their goals.

The ivory and rhino horn trade is also a useful economic incentive to reward or even finance surrogate insurgents, or other allies, who perform military, political or economic services on behalf of the minority white government. In the black market economy of South Africa - as in the rest of the continent - ivory is a preferable alternative to cash as it can be traded for highly valued foreign currencies, allowing traders to get money out of the country's tightly controlled banking system.

SA Mafia linked to killing fields

RUTHLESS highly-organised syndicates which run a smuggling business through

JUNE BEARZI, Star Line

'Johannesburg Star' Oct. 22nd, 1988.

to transport the illegal cargo from

South Africa - The Future

The elephant policy of South Africa can be seen as a reflection of what is happening on a larger scale in that country. The political isolation of the minority government there ensures that intense scrutiny of all activities, policies and developments are made in the world's press. No one was surprised, therefore, when South Africa opposed an international ban on the ivory trade, especially when considering the wider strategic and military overtones that it has assumed in government circles.

Anthony Hall Martin, the chief research officer of the National Parks of South Africa states "The fashion of blaming South Africa for every problem that besets the continent has now forced its way into conservation circles." He continues "It is true that perhaps as much as 40 to 50 tonnes of ivory are illegally exported from South African ports each year" then goes on to blame Zaire, Zambia and Botswana for allowing such exports.

"The zealots, mostly North American, somehow expect South Africa with its limited budget, manpower and facilities to successfully intercept all the illegal ivory passing through the country each year."

Hall Martin cleverly omits to say that it has been his government's policy to allow the illicit ivory and rhino horn trade to flourish and to give carte blanche to Mr Pong and his cohorts to do as they will as long as it serves the government's perceived interests.

The increasingly effective campaign of a group of dedicated South African conservationists, journalists and wildlife enforcement agencies to crackdown on the poachers paymasters is winning enthusiastic support and eroding the government's ability to continue to protect major ivory dealers.

John Ledger, of the Endangered Wildlife Trust has proposed that the South African government support an ivory ban for three years and offer assistance to train wildlife staff in other parts of Africa. It is hoped that Ledger's proposal is taken up by the recently elected government which has promised a new era of changed policies.

South African support for an international ban on the ivory trade would increase continental efforts to end elephant poaching and distance the new government from the shabby policies of its predecessors. Such a policy review should be accompanied by top level backing for the country's enforcement agencies to close down the serious damage being caused by the activities of people like Pong.

Such a move would be applauded internationally and significantly enhance the effectiveness of a ban. The infrastructure of the illegal ivory and rhino horn trade will be seriously damaged and put increased pressure on neighbouring countries to crackdown on such operations.

Angola

In 1988, Craig van Note, of the Washington DC based Monitor consortium gave detailed testimony to a US congressional committee which detailed the massive elephant and rhino poaching undertaken by UNITA in Angola. Ivory was taken in trucks belonging to the South African Defence Forces to Rundu on the Angola - Namibian border and then transported across Namibia to South Africa, where it was sent on to Taiwan or Hong Kong on boats and planes.

The charges outraged many people in South Africa, and the SADF was compelled to set up an internal inquiry which, not unsurprisingly cleared itself of all wrong doing. But dedicated work by a group of conservationists, journalists and wildlife officials, slowly began to force out the truth.

In the past year, an increasing number of major seizures of ivory and rhino horn in South Africa and Namibia have both validated Van Note's allegations and provided more detail as to the mode of operation of the major dealers. The seizures are a victory for a dedicated group of people in South Africa who bypass

Did 100 000 elephants die to pay for the war in Angola?

An American conservation group has told the US congress that Unita systematically killed off half the elephants in Angola and smuggled the ivory abroad to pay South Africa for its aid in the war. The SADF has set up a board to investigate the claims. EDDIE KOCH reports



Magnus Malan (left) and Jonas Savimbi ... at the centre of a row over illicit ivory

'Weekly Mail', South Africa, Sept. 2nd 1988.

the political controversy surrounding South Africa's position to press for effective enforcement of wildlife laws.

UNITA spokesmen such as Jonas Savimbi confirmed that UNITA used ivory to pay South Africa for military assistance. Another spokesman told an American reporter in 1988 that UNITA earned US \$1 million from ivory sales the year before. A major shipment of ivory was flown out of UNITA's headquarters to the Seychelles. UNITA was recently known to be seeking advice on how to set up an ivory carving factory, because worked ivory is much easier to move into South Africa, and from there into Hong Kong.

Ivory trafficking respects few political or ideological

boundaries. Even the Cuban soldiers in Angola fighting against the South African backed UNITA forces, traded ivory with South African dealers. Recently, a Cuban General admitted to smuggling ivory from Angola before he was executed by a firing squad in Havana.

Much of the ivory coming out of Angola is sent through Namibia, either to South Africa, or to Walvis Bay. Several major seizures of ivory have taken place in the past two months. One shipment of 145 tusks was seized in August. On September 14, police followed a truck loaded with vegetables as it crossed the Angolan border into the Caprivi Strip.



980 tusks seized in Namibia as they were driven in a container truck towards Walvis Bay on Sept. 16th 1989.

The truck contained 980 tusks weighing almost seven tonnes, and 14 rhino horns, valued at some US \$2 million. When the police stopped the vehicle in Okahanja, north of Windhoek, they arrested 6 men in the vehicle, five of whom spoke Portuguese. Another 21 people have subse-

quently been arrested in connection with the huge shipment.

Poaching has been increasing in Namibia in recent months, and police have been making increasing arrests of dealers, middlemen and poachers.

Mozambique

Mozambique is a country that has all the right conditions for the ivory trade; wretched poverty, famine and is at war with Renamo, a South African sponsored surrogate that has killed up to 100,000 of its citizens. The chaotic conditions surrounding the civil conflict there are no deterrent to the ivory traders from further north or from further south.

Renamo is aided by former members of Rhodesia's Selous Scouts, who are heavily involved in ivory and rhino horn trading from South Africa, Mozambique, Zambia, Tanzania and Burundi. Renamo is said to finance part of its war effort by selling poached ivory and rhino horn. They are also being aided by former Portuguese colonialists who left Mozambique after independence. South Africa is said to have ceased its formal support of Renamo after signing an agreement with the Mozambique government, but right wing elements are allowed to continue to provide supplies and military equipment to Renamo.

Mozambique is increasingly being used as the latest

convenient point of export for poached ivory and rhino horn. The country is increasingly reliant on South Africa economically which makes it an ideal entrepot for the dealers.

Burundi traders are redirecting ivory exports to Mozambique and there are persistent rumours that the 90 tonnes of stockpiled ivory in Burundi will be moved out through Mozambique. Mozambique is said to be willing to issue CITES permits to allow Burundi transitted ivory to be legally exported - for a price. One substantial shipment is said to have moved this way, apparently without the ivory even moving to Mozambique.

Anthony White (see above) was said to have a large stock of ivory in Beira a few months ago awaiting export. White is also said to be moving rhino horn into Mozambique from South Africa.

Some 98 rhino horns from the mainland were being offered for sale on the island of Bazaruto, in the Mozambique Channel, 15 kms east of Inhassoro, 50 kms north of Ponta Sao Sebastio as well as 100 leopard skins.

Robert Zolho, chief of the Wildlife Conservation Department in the Ministry of Agriculture said that the country's elephant population dropped from 54,800 in 1979 to an estimated 16,600, with more than 20% lost in 1985 - 86.

He claimed last year that some 60 tonnes of ivory was seized from Renamo, but in fact the ivory is actually from Burundi. The timing of the claim co-incides with a deal agreed between the Johannesburg based businessman Stefan Hayden, who owns shares in Botswana Game Industries (BGI), and Burundi dealers who offered Hayden 60 tonnes. Hayden claims he was promised the ivory would be legal - with CITES permits and withdrew when he discovered that no permits were available.

Mozambique filed quotas for 1988 and 1989 of 18,045 tusks and 17,961 tusks respectively. In 1988, Mozambique apparently exported less than 2,000 tusks and as of July, 1989 the Mozambique authorities claim to have only exported some 400 tusks. The quota has been filed solely to arrange the legalisation of poached ivory from Burundi.

Mozambique is being set up as the next major African entrepot to move poached ivory in anticipation that the 1989 CITES meeting will agree to allow continued legal ivory trading from southern Africa.

If this is allowed to happen, Mozambique will open a new chapter in the history of the African elephant disaster.



Tusks found in secret compartment in truck.

Botswana

Botswana is known as an easy entry point for poached ivory from Zambia and Zaire. Hans Beck, a Francistown dealer is said to have been bringing one tonne of ivory a month into his Francistown carving operation as well as delivering other amounts to South Africa for export, and for sale in his curio shop.

The attitude of the authorities appears to be one of disinterest in ivory smuggling. When Tony Viera was caught with the huge haul of some two tonnes of ivory and 94 rhino horns, he was given a tiny fine of \$2,000.

Botswana is part of the South African customs union. There are no customs control at its border with South Africa, which explains why it is so appealing to move ivory into the country.

Botswana is economically wealthy compared to many other African states, thanks to its diamond exports and a small population. It has an important population of elephants which have recently started to be hit by poachers.

Numerous carcasses have started to appear in Chobe National Park. The peace settlement in Angola

and the independence elections in neighbouring Namibia will result in thousands of homeless and jobless, but well armed, men looking for a way to survive. The elephant herds in northern Botswana will provide an appealing opportunity for such men.

Observers say that the recent outbreaks of poaching in Botswana do not appear to be of much concern to the Chobe Park staff.

Botswana is now proposing to implement a two year old management plan which calls for an annual "cropping" of at least 2,500 elephants. There is a great deal of hostility towards Zimbabwe to be found in Botswana because of that country's massive killing of elephants in Hwange Park. Thousands of elephants from Botswana cross into Zimbabwe and they are subsequently treated as if they are resident animals.

It is known that a number of cabinet ministers in the Botswana government are strongly opposed to killing elephants, which is the reason the management programme has been shelved for two years.

BURUNDI

BEGINNING OF THE TRAIL

Burundi has been at the centre of the African elephant disaster. Its rise as a major entrepot of poached ivory in 1975 co-incides with the establishment of CITES and the gradual escalation of the poaching tragedy.

At least 2,000 tonnes of ivory was smuggled into Burundi between 1975 and 1988, bringing hundreds of millions of dollars to the traders who invest in extinction.

The available evidence suggests that despite the Burundi Government's efforts to ban the illegal ivory trade, the power of the largest ivory traders is too great, and their influence with government officials is too entrenched to be easily removed. The central focus of the traders' continued hold over the government concerns the 90 tonnes of ivory that the CITES Secretariat has been attempting, with increasing desperation, to legalise.



Burundi delegation at AEWG meeting in Nairobi, Nov 1988.

Promises made by Burundi to western Governments that proceeds from the present stocks would go to conservation projects are meaningless, because the ivory dealers will not tolerate that.

Since 1986 when the CITES Secretariat legalised the 89 tonnes of ivory held in Burundi, and late 1988, some 500 tonnes of ivory was smuggled into Burundi from the surrounding countries.

An undisclosed amount of ivory was sent from Burundi to the United Arab Emirates in 1988, but at least 8.4 tonnes of ivory went to Dubai. A Zimbabwe dealer was also offered a ten tonne shipment. Other amounts of ivory are being moved out in containers by road and some are being flown out. Major shipments are reported in transit to Mozambique where they are exported on Asian bound vessels and planes.

One figure stands out as the major mover in the Burundi based ivory trade. Although the Al Capones of the ivory trade - George Poon and K.T. Wang (See Hong Kong section) - and a host of other smaller middlemen, dealers and agents have infested Bujumbura for years, the name of Zulfakar (Zully) Rahemtullah is always spoken in hushed whispers and only with great reluctance, while they look nervously over their shoulders.

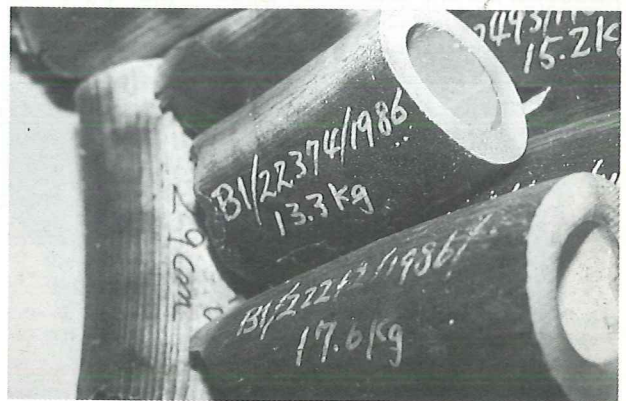
One man on Rahemtullah's trail was a senior CID officer in Tanzania, who was given the task of tracking a mysterious figure known as Zaidi Baraka. Mbonga Juma discovered that "Zaidi Baraka", controlled a major poaching and smuggling network in his country.

Baraka's real name, Juma discovered, was Zulfakar Rahemtullah. Mbonga Juma, around 40 years old, suddenly took sick in December, 1988, and died soon after.

Rahemtullah has two companies and a house in Bujumbura; 'Ashams Gemstones' and 'Super Marche Dimitri'. In Nairobi, he also has an office for 'Ashams Gemstones', plus two restaurants - The Khyber and The Chinagate. This latter restaurant, being one of the most exclusive in Nairobi, can be viewed most evenings surrounded by bright shining BMW's and Mercedes. He has relatives in Dar es Salaam, and a network of contacts that comprises a massive poaching empire stretching across central and east Africa.

Rahemtaullah's operations and contacts stretch into the adjoining countries of Zaire, Kenya, Tanzania and Zambia amongst others. Rahemtullah was the owner, through his local agents, of some 60 tonnes of the ivory in Burundi that was legalised by the CITES Secretariat. He is believed to own through his agents, most of the stocks presently held in Bujumbura.

His Bujumbura agents are well known traders, like Tariq Bashir and Jaffer Habib. When the government ordered all ivory to be brought to a military camp, pending its legalisation, Bashir got caught bribing the man at the weighing in scales in the hope of getting his stock declared to be much greater than it really was to cover new shipments already en route for Bujumbura from neighbouring countries.



Ivory from 1986 Burundi stockpile marked with an indelible pen in a factory in Hong Kong.

As soon as Rahemtullah's ivory was legalised by the Secretariat and flown to Hong Kong and mainland China, via Belgium, his network of agents, middlemen and transporters were in action. Ivory was flooding in from Tanzania and Zaire.

A great deal of ivory moved by Burundi dealers is sent out by road in containers. The containers are loaded onto Somali owned trucks or ivory is packed into false compartments. The vehicles change their licence plates frequently as they travel through Tanzania. Trucks carrying major shipments are usually escorted by two other vehicles, both carrying large sums of cash. One vehicle goes ahead to pay off police at roadblocks en route and the second follows the truck carrying the ivory shipment. If trouble occurs, the men in the second vehicle try to buy off officials.

Rahemtullah has close links with Egyptians working in Tanzania who are involved in gold smuggling frauds and ivory trading. They all work closely with the Egyptian military attache in Dar es Salaam.

Five of Rahemtullah's trucks arrived at the Egyptian military attache's residence in two months. Rahemtullah's local agents, including one man who was identified as a family relation, work closely with 'Mwanambokah Transport', a firm which operates a major fleet of trucks around eastern, southern and central Africa.

In December, 1986, Tanzanian police acted on a tip and tried to arrest a truck with 25 people in it. The truck refused to stop and there was an exchange of gunfire before the vehicle stopped. The police seized 224 tusks and arrested 12 of the people.

The driver of the truck, Iddi Omari, admitted that he had made 23 trips in the previous two years to Burundi carrying 210 to 265 tusks each time, on behalf of Rahemtullah in his Zairean based vehicle.

Two of Rahemtullah's trucks carried ivory to Burundi in early October, 1987, with 308 tusks and 274 tusks respectively.

Earlier that year, in January, a Fiat truck overturned near Dodoma in Tanzania, killing a Mohamed Abdullah, a Somalia national, who was the owner and driver, as well as injuring two other Somalia nationals in the truck. Abdullah's suitcase was packed with over 500,000 Tanzanian shillings (about \$2,500 US) and another 400,000 (\$2,000) was found in his briefcase. The two accomplices were sentenced to five years in prison.

Rahemtullah's secret transit route was revealed by the accident when 477 tusks were discovered, weighing 2,295 kg in a container carried by the truck. Another 92 tusks were found in a secret compartment. The Burundi export documents seized from the vehicle showed the cargo as cotton and cottonseed, but the ivory was from the region of Dodoma, identifiable because of the heavy ivory typical of elephants in that region which feed on vegetation growing in soil with a high mineral content.

A Burundi government official had flown into Tanzania to attach a customs "in transit" seal to the container and to issue fraudulent Burundi government documents for the shipment.

From Burundi to Dubai

Rahemtullah's poached ivory business thrived following the windfall profits derived from the CITES Secretariat "amnesty" of his 60 plus tonnes. The money was reinvested in buying the favours of high priced officials and consultants, and to pay the chain of middlemen who advanced money, arms and ammunition to the poaching gangs in Zaire, Zambia, Kenya and Tanzania. The mass butchery of tens of thousands of elephants con-



Container full of ivory from Burundi arriving in Dubai.

tinued unabated, from Tsavo to the Selous to the Zambezi.

The Poon syndicate's ivory carving factories, 'M.K. Jewellery' and 'Dubai Ivory Factory' that were located in the Jebel Ali Freezone in Dubai, UAE, were thriving too.

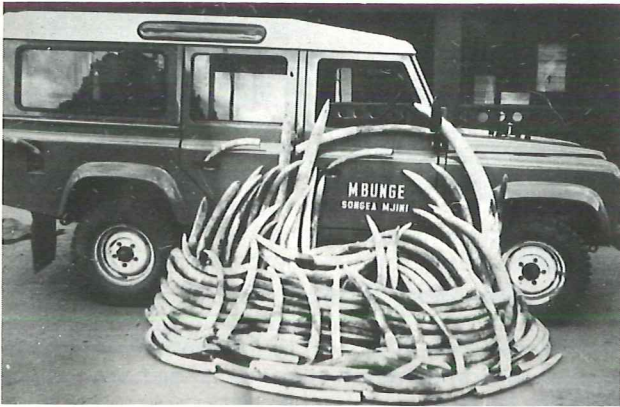
The shipments from Burundi were arriving regularly on flights from Bujumbura, while other shipments arrived by dhow in Dubai's Hamriya port, and others came in containers through Dubai's Port Rashid.

Two days after the first shipment noted below arrived, George Poon and his brother Poon Tat Hong welcomed two Burundi middlemen well known to Rahemtullah, Ali Suleiman and Jamal Nasser to the Jebel Ali operation. A selection of the shipments going only to one of Poon's factories - 'Dubai Ivory Factory', reveals the extent of the continuing African elephant disaster.

- 1) 27/12/86 28,885 kg on Ethiopian Air flight ET 8864, airwaybill No. 071-02957849
- 2) 29/12/86 2,150 kg addressed to Ali Suleiman arrived from Bujumbura, on ET 812, airwaybill No. 071-02957850
- 3) 11/1/87 1,000 kg shown on a bill of entry, shipped from Madrid.
- 4) 19/1/87 2,150 kg arrived from Ali Suleiman from Bujumbura on flight ET812, airwaybill No. 71-02957850
- 5) 4/3/87 352 kg arrived on Lufthansa flight 4618 from Bujumbura, airwaybill No. 22039574990
- 6) 4/2/87 an undisclosed amount arrived on ET632 from Bujumbura on 4 February, 1987, airwaybill No. 071-03456014
- 7) 9/3/87 330 kg on flight FR392.
- 8) 22/3/87 two containers of ivory, numbers 03947848 N and 361892-1 arrived at Dubai Ivory Factory.
- 9) 4/4/87 two 20 foot containers delivered by M.V. Al Manack to Port Rashid, numbers OOLU 2306023 and ITLU 6316292.
- 10) 5/4/87 8,579.5 kg arrived in Hamriya port on 5 April, 1987, bill No. 0476, container No. ITLU 624309-7
- 11) 5/4/87 2 containers unloaded at Jebel Ali for Dubai Ivory Factory, numbers INTU 2923200 and UFCU 3961226.
- 12) 8/4/87 an undisclosed amount arrived on Lufthansa flight LH680, from Bujumbura.
- 13) 20/6/87 11,675 kg arrived from Bujumbura on ET flight 8464 on 20 June, 1987.
- 14) 2/8/87 4,030 kg arrived on 2 September from Bujumbura on an unidentified airline.
- 15) Two containers arrived in Port Rashid from a "Mr Aguila"

The evidence is that the Burundi government's undertaking to close down the ivory trade remains unfulfilled. The Secretariat's plan to legalise almost 90 tonnes of ivory in Bujumbura was statedly based on the premise that such illegal exports had ceased.

Ivory from Burundi is now being exported through Mozambique following crackdowns in Kenya and Tanzania that have caused serious damage to the illegal ivory trade which sponsors the poaching gangs. The corruption that ivory traders rely on in every situation, whether in Africa, Hong Kong or Switzerland is not working so well anymore in east Africa.



Seizure from the M.P. for Songea in Tanzania. He was sentenced to 12 years imprisonment.

Tanzania's enforcement has become increasingly effective since 1987 when the internal ivory trade was banned at the personal insistence of President Mwinyi. Regular large seizures of ivory in Tanzania in 1987 and 1988 amounted to almost 20 tonnes in those two years, with more than 10 tonnes confiscated in 1989. Ivory traders have been forced to move south into Mozambique.

Poachers are being killed, dealers and middlemen are being arrested, politicians are being imprisoned, confiscated ivory is being stored, or burnt, but not being traded and not being spirited away to Burundi in the dead of night. The tide has turned, and the poachers are

on the run, leaving their paymasters bewildered at the unprecedented attack on their previously unchallenged empires.

The personal support of Presidents Mwinyi in Tanzania and Moi in Kenya of radical measures to conserve elephants has resulted in powerful new administrations being installed in their wildlife departments. This has raised the political profile of wildlife departments and encouraged conservationists throughout the continent. The poachers and dealers are on the defensive and scrutiny has now fallen onto poaching and corruption in other countries in central and southern Africa which are opposing an ivory trade ban.

But as long as Hong Kong and Japan are paying the Poons for poached ivory, the elephants continue to die and the ivory moves relentlessly eastward.

Constantius Mlay, the new Director of Wildlife in Tanzania says "We cannot stop the poaching of the elephants as long as the big men in Hong Kong, Taiwan, Singapore and Japan are going to buy ivory. As long as they buy ivory, an African will go out to kill an elephant." Paul Sarakiky, the head of Tanzania's eastern region anti poaching forces said "We pray to the international community to totally suppress the ivory trade to help us save our elephants".



Ivory found in a container belonging to the Indonesian Ambassador to Tanzania in Jan. 1989.

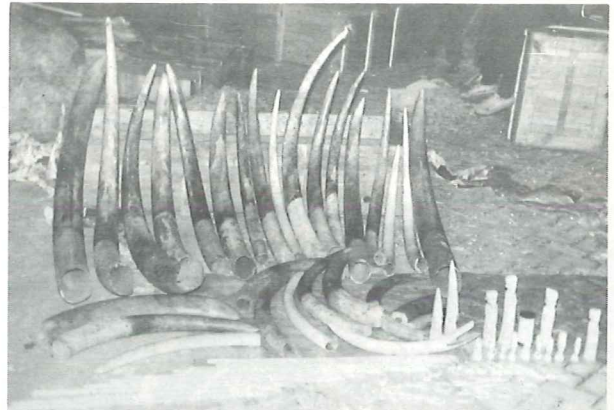
UNITED ARAB EMIRATES - ENTREPOT

On 4th May 1989, EIA took Independent Television News (ITN) correspondent Desmond Hamill into an ivory factory in Dubai. Inside 'Belhon Trading' the tusks from hundreds of poached elephants were being worked by semi-skilled labour, mechanically reduced to seals and jewellery for the Far Eastern market. In a year, the eight semi-skilled workers used thousands of poached tusks and according to Simon Li, the manager, the semi finished products go to "one of our other factories in Taiwan or Hong Kong". Interviewed later, he admitted ivory was also imported from Zimbabwe and that some of the seals were also destined for Japan.



ITN correspondent Desmond Hamill interviewing Simon Li, manager of 'Belhon Trading' ivory factory in Dubai May 1989.

Just 30 minutes drive away in the emirate of Ajman, twelve factory units, each larger than 'Belhon Trading' were churning out ivory jewellery from factories controlled by George Poon. On that day we found a sea container outside the office of 'Pearl Workshop' which had just arrived through Dubai's Port Rashid. Outside one of the factories we confronted Poon who pretended he could only speak Cantonese. He ordered his staff to conceal their activities and even denied being involved in the ivory business. His reaction to the video camera was violent, and his false innocence turned to rage. Quick thinking saved the camera, but Poon jumped on the car and travelled some distance clinging to the door before accepting defeat. His knowledge of abusive English improved considerably and his fist shaking gestures could be seen in the mirror as we accelerated away from his domain. George Poon understands very well that his activities rely upon secrecy and we had the first known pictures of him on our back seat.



Container outside George Poon's Ajman factory, May 1989.

Just weeks earlier a dhow had sneaked into Khor Fakkan, a small port in the emirate of Sharjah, reputed to have 70 tonnes of poached Tanzanian ivory on board. Abdulla Ali Bamakramah, a Yemeni merchant, waited patiently for his shipment as he has done so many times before. He was eager to supply the local factories that, in recent years, had brought customers to his door step.

The UAE has been a major entrepot for the illegal ivory trade for the last seven years. During this period the tusks from over 100,000 poached elephants have been fed through the UAE into the international CITES system to be consumed in the Far East, Europe and the USA.

Always steps ahead of international controls, in 1983 the ivory traders anticipated the closure of Belgium as a major entrepot and started to work through established contacts in the UAE. At the same time they built up Macau and Singapore as simple alternatives. By the end of 1985 in anticipation of stricter requirements in Japan, on raw ivory imports, the UAE had become the most important entrepot for the trade.

The UAE notified its withdrawal from CITES in January 1987, one month after Hong Kong traders had been issued licences to set up ivory carving factories. At the CITES meeting in Ottawa that year the Secretariat and some parties declared that they would pressurize the UAE at the highest level. Despite this the factories continued to operate and in 1989 the UAE allowed expansion of factories in Ajman. At the peak of international concern over the factories, George Poon was hanging new signs over his expanded operation and personally supervising where they were put. At the same time, when help was sought by Tanzania for the recovery of poached tusks, their delegation was met by time-wasting and obstructive UAE officials.

United Arab Emirates
MINISTRY OF INTERIOR
DIRECTORATE GENERAL OF SECURITY AFFAIRS
INTERPOL 480 28881



TELEX 2206 UAEPOL EM
TELEPHONE 37066
P.O. BOX 104

United Arab Emirates
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DIRECTORATE GENERAL OF SECURITY AFFAIRS
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TELEX 2206 UAEPOL EM
TELEPHONE 37066
P.O. BOX 104

Excerpt from a UAE Interpol document authorising the release of Tanzanian ivory to the consignee, April 1989.

United Arab Emirates
Ministry of Justice &
Islamic Affairs & Jurisdiction

PROSECUTION

Memorandum
in case No. 5 for the year 89 Administrative

This case started when the Interpol was informed that a motor boat shipped with elephant tusks had arrived to Ebn-Fakkan sea port loaded with 70 tonnes of smuggled tusks from Tanzania!

Detection of the boat and its crew was requested and investigating the whole case as well in virtue of the international convention of endangered animals, as the U.A.E. is considered to have signed this convention.

When the boat captain was interrogated he stated that he had received the tusks in the middle of the sea and a way from any of the Tanzanian ports.

He added that the quantity of tusks is three tonnes only.

Whereas the U.A.E.'s had joined the international convention of endangered animals and herbs (Union Decree No. 84 for the year 1974 issued on 21.10.74). Then the U.A.E.'s was withdrawn from this convention in accordance with the Union Decree No. 88 for the year 1986, issued on 29.10.1986.

The perusal of the said convention revealed that it impose the prohibition of importing and re-exporting of sample

The public prosecution has nothing but to drop the case and to release the captain on bail.

The remaining part of this case is the administrative one which is the responsibility of the police i.e either to confiscate the shipment or re-exporting it, although such measurements are not obligatory to the U.A.E.'s since the withdrawal has taken place on 20. 2. 1988.

The U. A. E. is not obliged to apply any of the administrative procedures mentioned in the convention.

The Police authorities are free to deliver the shipment to its owner and to release the Boat.

After ITN broadcast three TV News Specials on the ivory trade, EIA supplied considerable information to the international media: amongst them was the British newspaper 'TODAY'. Their reporter, armed with maps of all the factories, went to Dubai and Ajman, entered factories, and was arrested. The resulting publicity around the world embarrassed the Dubai authorities who announced a ban on ivory. The 'ban' imposed in Dubai has not been echoed by all the other Emirates (some within 30 minutes drive from Dubai), and although we must welcome an announcement that the UAE intends to rejoin CITES, recent shipments of ivory from Dubai International Airport give grave cause for concern.

The UAE has been involved in an international crime racket that has contributed greatly to the African elephant disaster. A stated intention to rejoin CITES is not enough. The UAE is a prosperous nation which has benefitted from the wholesale slaughter of one of Africa's most important species - a key to the ecology of African countries and valuable tourism. The UAE should finance programmes to help African countries to increase protection for the few elephants that remain.

In addition to this, the activities of the traders in the UAE should be investigated fully. Their finances should be analysed and documentation relating to ivory imports and exports should be made available to those trying to stop their activities. The UAE owes a huge debt to Africa.

Ivory imports and exports

It is important to remember that shipments of ivory through the UAE have all been outside the CITES system despite the UAE being a Party to CITES when the system was devised. Since January 1984 over 1,000 tonnes of illegally obtained ivory is reported to have passed through Dubai, monitored by the ivory industry. This activity continued with the knowledge of the Rulers and the local Municipalities. Most of it went on to Singapore, destined for Hong Kong and Japan.

The fact that the Dubai statistics do not show this massive amount of ivory is not surprising. The traders, even though they may not be acting illegally in a particular country, have often concealed ivory trading from the international community. The trade is fully aware of the value of customs statistics to conservationists, and it is in their interest to work discreetly. These tactics are used routinely. In 1988, the Poons were importing worked ivory into Hong Kong from Dubai and Singapore, before it was illegal to do so and yet they used cover names and addresses for their imports.

The traders have always been many steps ahead of CITES regulations, monitoring by governments and conservationists. The essence of their business is secrecy. The trade has been operating underground for the last decade and any arguments against an international ivory ban based on the fear that the trade will be driven underground are naive. The trade is already operating this way and the statistics available through Customs and CITES are only the figures that the trade are prepared to reveal. The permits that CITES issue are an endorsement of the illegal trade.

Dubai is a centre for trade in all commodities, both legal and illegal, and the relaxed attitude to bureaucracy speeds up the process for clients. In Port Rashid, the authorities pride themselves on rapid turn around on cargo with a well developed 'Sea-Air' system. Bonded

shipments can be flown out of Dubai International airport hours after being unloaded from a container ship. No record of cargo would appear on customs data.

The traders established in the UAE have a powerful network of contacts and are linked to many suppliers. For example:

- In February 1989 the Indonesian Ambassador to Tanzania, caught red-handed sending a container from Dar Es Salaam, Tanzania, was exporting his ivory to the UAE. Inside his Embassy an illegal carving industry had been set up.



Boxes full of ivory packed in Indonesian Ambassador to Tanzania's container, Jan. 1989.

- 5 tonnes of ivory flown from Zaire to London's Heathrow Airport in 1988 are reported to have been destined for the UAE.
- The 'Dubai Trade and Trust Co' owned by the Al Fayed brothers better known for their ownership of the 'Harrods' store in London, has been shipping ivory from Dubai International Airport to 'Summer International' in Taiwan.
- Shipments from Poon's Ajman factories to Belgium and West Germany bound for Singapore have been discovered in 1989.
- Burundi has exported hundreds of tonnes of ivory to the UAE.
- Traders known to operate in Burundi and Belgium have visited factories in the UAE. One of these, Ali Suleiman, was murdered in Antwerp on September 2nd 1989. Suleiman was known to deal in ivory from Kinshasa, Zaire.
- The dhow 'Khairat Oman' carried poached tusks from Tanzania to the UAE in March 1989.
- Tariq Bashir, a well known Burundi dealer, shipped almost 80 tonnes of poached ivory in ten consignments on forged Zairean permits in 1985. It went to the UAE and was re-exported to Hong Kong and Japan.
- In January 1986 two containers with 1,189 tusks valued at almost US \$1.5 million were seized in Antwerp. The containers were being transhipped from Tanzania to the UAE. The cargo was described as 'beeswax'.
- Between September and December 1983 55 shipments of ivory amounting to over 24 tonnes were shipped from Belgium to the UAE by Poon and Wang in anticipation of Belgium's membership of CITES.

Belgium and West Germany - Transit for poached ivory

Statistics can be concealed by a number of means including bribery of officials, false description of goods, and smuggling.

As an example of this it is known that in 1989 regular shipments of worked ivory were sent from the Ajman factories to Singapore via Belgium and West Germany. These shipments were described as 'fashion' or 'imitation jewellery' and departed from Dubai International Airport, some after the 'ivory ban' was imposed by the Ruler of Dubai.

The Belgian shipments were shipped by Sabena and consigned to Comexas Air Freight in Zaventum, sometimes marked for the attention of "Mr Tony" and the air waybill carried special instructions "Don't mention UAE". They

232 | DXB | 94296576 232-94296576

Shipper's Name and Address AL RAIS CARGO P.O. BOX 4713 DUBAI U.A.E.		Shipper's Account Number 003012		Not negotiable Air Waybill MALAYSIAN AIRLINE SYSTEM BERHAD 37th Floor, Bangunan Mas, Jalan Sultan Ismail, 50250 Kuala Lumpur, Malaysia		
Consignee's Name and Address HERMANN LUDWIG GMBH & CO. FASANENUEG 7 6092 - KELSTERBACH, FRANKFURT TEL: (6107) 77000		Consignee's Account Number		It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.		
Issuing Carrier's Agent Name and City D N A T A DUBAI		Accounting Information P.O. 12417 SCC NO 0657		Agent's IATA Code 36-4-7291		
Airport of Departure (Addr. of first Carrier) and requested Routing DUBAI		Currency ADH		Declared Value for Carriage NUD		
To: By first Carrier FRA MALAYSIAN AIRLIN		Flight/Date FRANKFURT		Amount of Insurance INSURANCE - If carrier offers insurance and such insurance is requested in accordance with conditions on reverse hereof indicate amount to be insured in figures in box marked Amount of Insurance.		
Handling Information 09 CTNS. EXDF NO. 021847 (LOC: MISC.)						
No. of Pieces PCP	Gross Weight	Rate Class Commodity Item No.	Chargeable Weight	Rate Charge	Total	Nature and Quantity of Goods (incl. Dimensions or Volume)
9	360.00		360.00		AS AGREED	FASHION JEWELRY (FASHION JEWELLERY) DIM: 17X15X09 IN/9
Prepaid Weight Charge						

082 | DXB | 71844721 082-71844721

Shipper's Name and Address AL RAIS CARGO P.O. BOX 4713 DUBAI, U.A.E. TEL: 223565		Shipper's Account Number 003012		Not negotiable Air Waybill SABENA Societe anonyme belge member of I.A.T.A. d'Exploitation de la navigation aerienne SABENA 35, rue Carinal Herquier, Brussels-Belgium R.C.B.-2812-U.A.T.-403-451-549 Copies 1, 2 and 3 of this Air Waybill are originals and have the same validity.		
Consignee's Name and Address COMEXAS AIR FREIGHT P.O. BOX 336, B-1931 ZAVENTUM BELGIUM. ATTN: MR. TONY TEL: 2-7518040		Consignee's Account Number		It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.		
Issuing Carrier's Agent Name and City D N A T A DUBAI		Accounting Information P.O. 12388		Agent's IATA Code 36-4-7291		
Airport of Departure (Addr. of first Carrier) and requested Routing DUBAI		Currency ADH		Declared Value for Carriage NUD		
To: By first Carrier BRU SABENA AIRLINES		Flight/Date BRUSSELS		Amount of Insurance INSURANCE - If carrier offers insurance and such insurance is requested in accordance with conditions on reverse hereof indicate amount to be insured in figures in box marked Amount of Insurance.		
Handling Information 10 CASES. PLS INFORM CNEE UPON ARRVL. EXDF NO. 020052 (LOC: SNU)						
No. of Pieces PCP	Gross Weight	Rate Class Commodity Item No.	Chargeable Weight	Rate Charge	Total	Nature and Quantity of Goods (incl. Dimensions or Volume)
10	410.00		410.00		AS AGREED	FASHION JEWELRY (FASHION JEWELLERY) DIM: 17X16X9 IN/10
Prepaid Weight Charge						

were immediately sent on to Singapore with a new air waybill with Belgium names as country of origin. The new shipper was Mme Poon Wo Tai Alice, 'Societe Civile Immobiliere' at George Poon's Paris address. The consignee was 'Sun May Art Industry', a new Singapore company which took over the premises of 'Kyomi Handicraft & Trading' (a Poon front company). 13 consignments are known to have been shipped between January and 15th May 1989, when a consignment was confiscated by Belgian Customs. They weighed 6,213 kg.

The West German shipments were carried by Malaysian Airlines and consigned to 'Hermann Ludwig GmbH & Co' in Frankfurt. These shipments were also destined for Singapore. Three consignments are known to have been shipped between 15th February and 5th March 1989 weighing 746 kg.

Air waybills showing ivory from Dubai consigned to Germany and Belgium, March 1989.

Even though statistics hide the volume of trade, it is revealing to learn the range of trading partners that the factories have been involved with in the last few years. The following table shows statistics for the Emirate of Dubai and its Free Zone only. Statistics for other Emirates have not been kept in such detail.

IMPORTS OF RAW AND SIMPLY PREPARED IVORY FOR DUBAI AND ITS FREE ZONE 1987 AND 1988

Country	kg
Thailand	8
Kenya	28,032
Tanzania	99,860
Indonesia	692
Zaire	3,470
North Yemen	4,000
Burundi	53,683
Zambia	600
Spain	1,404
Greece	108
Zimbabwe	219
Nigeria	6,000
United Kingdom	968
Cameroon	2,900
Total	201,944

EXPORTS/RE-EXPORTS/TRANSIT RAW AND SIMPLY PREPARED IVORY FOR DUBAI AND ITS FREE ZONE 1987 AND 1988

Taiwan	82,312
Singapore	39,373
Hong Kong	14,772
India	600
South Korea	2,220
United States of America	2,323
China	3,736
United Kingdom	90
Saudi Arabia	266
West Germany	136
Unspecified	9,398
TOTAL	155,226

Interviews in 1989 with workers in factories in the UAE revealed that ivory is sent to Hong Kong, Singapore, Japan and Taiwan. Hong Kong customs import statistics show that even after August 1988 when the law required 'worked' ivory imports to be accompanied by CITES permits, shipments were still declared and entered Hong Kong in October 1988 despite no permits having been issued for the UAE.

Abdulla Ali Bamakramah

On August 12th 1988 a shipment of 20 tonnes of raw ivory was shipped to 'Al Redha General Trading Establishment' Dubai. The CITES permit was false and the exporter, 'Ebony & Ivory Trophy Dealers' Lusaka, did not exist. As is often the case, there is no record of the import in Dubai Customs figures. The Zambian export permit and the Zambian exchange control documents show that US \$870,000 was paid by 'Al Redha'.



'Al Redha General Trading Est.' Dubai.

REPUBLIC OF ZAMBIA (This number must not be obliterated or altered) B No. 22506

EXCHANGE CONTROL (Laws, Vol. IX, Cap. 276)

EXPORTS FROM THE REPUBLIC OF ZAMBIA

FOR CUSTOMER'S USE

FOR USE OF BANK OF ZAMBIA, EXCHANGE CONTROL AND AUTHORISED DEALERS

BANK OF CREDIT AND COMMERCIAL (ZAMBIA) LIMITED P.O. BOX 31910 LUSAKA

D/E Export No.: 4611/BB

1. Are the goods exported in pursuance of a Contract of Sale? YES/NO (Delete whichever is inapplicable)

2. Export Licence No. 0024206

If so, give name and full business address of:

(a) seller, and (b) buyer

(a) Ebony and Ivory Trophy Dealers P.O. Box 50105, LUSAKA ZAMBIA

(b) Al Redha General Trading Establishment P.O. Box 1110 DUBAI, UNITED ARAB EMIRATES

3. Name and full business address of:

(a) consignor, and (b) consignee

(a) Ebony and Ivory Trophy Dealers P.O. Box 50105, LUSAKA ZAMBIA

(b) ..

4. Short description of goods, including quantity. The value of the goods (how also be stated if different from the amount shown in paragraph 4 below.

20 TONS RAW IVORY ELEPHANT TUSKS

\$7,000,000.00

5. Amount received and to be received in settlement stating in what currency. If the amount is not exactly known state so and give an estimate.

Approximately US \$870,000.00

6. Approximate date on which payment is to be made.

27th July, 1988

7. Precise details of the manner in which payment will be received in Zambia. (Mark x in the applicable square.)

Payment in Zambian Currency from a Non-Resident Account.

Payment in Zambian Currency from an External Account.

Payment by Bank Draft in a Foreign Currency.

Payment by Bank Draft in Zambian Currency.

Payment by drawing under a letter of Credit in Zambian Currency.

Payment by drawing under a letter of Credit in a Foreign Currency.

Payment by Mail Transfer.

Payment by Telegraphic Transfer

Engrain; no movement of funds involved.

Other methods of Payment - Specify: ... Bank Draft

BANK OF CREDIT AND COMMERCIAL (ZAMBIA) LIMITED P.O. BOX 31910 LUSAKA

8. Name and Address of exporter's bank in Zambia

Bank of Credit and Commerce (Zambia) Ltd. P.O. Box 14940 LUSAKA ZAMBIA

9. I declare that the above particulars are true and correct and that I will ensure that payment is made by the due date in the form indicated above.

Signature: _____ Date: 15th June, 1988

Zambian exchange control document showing 20 tonnes of ivory consigned to 'Al Redha', Dubai, June 15th 1988.

The head of 'Al Redha' is a man who calls himself a Sheik and has been ordering poached tusks from Africa for years. Abdulla Ali Bamakramah is an elderly Yemeni merchant who has offices run by his brother in Jeddah, Saudi Arabia, Kampala, Uganda, Bujumbura, Burundi and offices in Dubai where he lives. He is well known on the Gulf as 'the man who runs ivory' but outside the

region he has kept his dealings secret, as part of the undercover operations of the international trade. His business has been central to the UAE's significance as a major entrepot.



Abdulla Yamvi (left) who admitted "I smuggle ivory", February 1989.

Bamakramah is said to be mean with his money. His offices are small and dingy and his boats are poorly maintained. His penetration of Africa can be seen by walking into the clothes shop which he owns beneath his Dubai offices. There beneath the glass top of a desk are currency notes from all over Africa. His Indian assistant Abdulla Yamvi, when asked why there was so much African currency gleefully announced "I smuggle ivory!" Yamvi, who operates the telex and deals for Bamakramah, admitted to visiting Tanzania, Kenya, Rwanda, Burundi and Zaire. When asked where ivory came from he explained "Tanzania, Kenya and Zambia. Now only Tanzania is good. Tanzania is more elephants, Kenya is finished...Tanzania is closed but it is smuggled." Yamvi explained that the ivory was sold to the factories in Ajman and Dubai.



'Fadhil Allah' regularly shipped poached ivory from the East African coast for Bamakramah.

For the last seven years Bamakramah's coastal vessel the 'Fadhil Allah' has shipped ivory and rhino horn from Kenya, Tanzania, Mozambique and Somalia. This 532 tonne ship regularly sailed between Dubai, Gizan (Saudi Arabia), Djibouti and East African ports such as Lamu and Mombasa in Kenya and Tanga and Dar Es Salaam in Tanzania. The captain pretended to leave port destined for the Middle East, but after a day or so doubled back and anchored off the Tanzanian coast. The vessel was supplied with tusks and rhino horn by small dug out canoes at night. On one voyage in January 1986 it is known that the 'Fadhil Allah' carried about 9 tonnes of poached tusks and 200 rhino horns. On this occasion the shipment was unloaded in Gizan, Saudi Arabia: the horns went to Bamakramah's brother in Jeddah and the tusks by road via Qatar to Dubai. The 'Fadhil Allah' was sold by Bamakramah earlier this year.

Bamakramah's East African agent was Said Faraj, a

Kenyan based in Mombasa. Said Faraj operated a dhow called the 'Fadhil Al Karim' which also supplied Dubai. This vessel is still owned by Bamakramah and is known to still operate between Dubai and Mombasa.

Bamakramah also charters vessels for the transportation of huge quantities of ivory. He has ordered major shipments from Tanzania which have been supplied by dhow. Most of the dhows dock at Hamriya Port in Dubai where traditional craft are encouraged. Although Customs are present, vehicles are able to drive up to the dhows and unload ivory without any checks.

Khairat Oman incident

In March 1989 Tanzanian officials sought assistance from the UAE Government to return ivory illegally taken from Tanzania, and to interview the crew of the dhow 'Khairat Oman'.

EIA discovered a trading relationship between 'Al Waffa Enterprises', Dar Es Salaam, Tanzania and Bamakramah's 'Al Redha General Trading Est.' Hippo teeth were exported by 'Al Waffa'. From information later supplied by Bamakramah, it was discovered that 'Al Waffa' also trade with Bin Khalas, a Dubai trader known to deal in rhino horn. The Tanzanian authorities obtained information on a shipment from 'Al Waffa' of 70 tonnes of ivory consigned for Bamakramah in Dubai.

AL-WAFFA ENTERPRISES LIMITED						
(GENERAL IMPORTERS AND EXPORTERS)						
NYAMWEZI ST. PLOT No. 7 KARIAKOO AREA						
P.O. Box 15354 DAR ES SALAAM/TANZANIA (EAST AFRICA)						
TEL. No. 35044, 30413, 28375						
CABLEGRAM: ALWAFFA						
TLX: _____						
FAX: _____						
INVOICE						No.
BUYER: AL REDHA GENERAL TRADING & CONTRACTING						006
P.O. BOX 1110						
DEIRA DUBAI						
Date						05 Jan, 1989
ORDER No.	ITEM No.	DESCRIPTION OF GOODS	QUANTITY	UNIT PRICE	CURRENCY	
4	1	HIPPO TEETH	704 Kg	3.00	2112	00
		FREIGHT CHARGES			847	05
					2959	05
					2959	05
TOTAL F.O.B. US \$ 2112.00						
TOTAL C.I.F. US \$ 2959.05						
INSURANCE CHARGES:						
OTHER CHARGES:						
AMOUNT IN WORDS:						
TWO THOUSANDS NINE HUNDREDS AND FIFTY						
NINE CENTS FIVE DOLLARS ONLY						

PACKINGS:

1. PAYMENTS:
2. METHOD OF SHIPMENT:
3. DATE OF SHIPMENT:
4. OFFER VALID UNTIL:
5. PORT OF SHIPMENT:
6. COUNTRY OF ORIGIN:
7. ALL OFFER SUBJECT TO FINAL CONFIRMATION FROM SUPPLIERS AND TO OUR CONDITIONS OF SALE

Invoice for 704 kg hippo teeth which establishes trade link between 'Al Redha' and 'Al Waffa', Jan 5th 1989.

Tanzania notified INTERPOL and the UAE Government informed Tanzania that they had seized the vessel and 70 tonnes of ivory on 14th March. Tanzania sent a delegation to the UAE to investigate the incident and request the return of the ivory.

The delegation had their Passports removed on arrival and heard nothing from the local Police for two days. When they finally met with the Director of Federal CID in Abu Dhabi he refused to let them speak to the Police who had seized the 'Khairat Oman' or to see the vessel and its cargo until their lien, a request for the return of the ivory had been translated from English to Arabic.

From this moment on a web of misinformation was fed to them and for nearly three weeks the Police pretended that the dhow and its cargo was still in their custody. The lien had still not been translated three weeks later.

EIA discovered that the dhow had been seized on 14th March, 24 hours after it berthed in the small port of

Khor Fakkan in the Emirate of Sharjah. The ivory was discharged to Bamakramah three days later. The dhow and its crew were released on 1st April, three days after the Tanzanian delegation had arrived in Dubai. The cargo was said to be only 1,740 kg ivory and Bamakramah claimed to have sold it but couldn't remember who to!

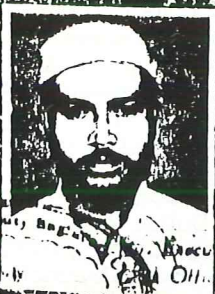
मनव एचओ फॉर्म 16
FORM S. V. 16

नाम **JUSUB MAMAD JUNEJA**
Name

पञ्चान पत्र सं.
Identify Card No. **MMNV 359**

(नोट :- मारिफ संख्या के साथ जारी करने वाले पत्र के पञ्चान पत्र संकेत समान हों।)
(Note :- The number of the book shall be the same as the letters of the Identify Card.)

No. PL
13-10-1988



उपर का फोटो, हस्ताक्षर करने वाले अधिकारी के कार्यालय की मुहर, पंजाब: प्रिंट, पञ्चान पत्र संख्या और जारी करने वाले अधिकारी द्वारा प्रस्तावित संख्या प्रमाणित किया जाय।
This card should be authenticated by impressing the official stamp of the issuing authority partly on the photo and partly on the Book and by affixing signature of the issuing officer.

Duplicate card issued on 3-12-88

31/1/88
By Executive Engineer (C) Post Office, Mumbai-Kutch

प्रमाणित किया जाता है कि

यह _____ का _____ का नाम है।
This is to Certify that **Jusub mamad Juneja** son of Shri **Mamud gulmamad** whose signature and/or left hand thumb impression and photograph are attached and whose particulars are entered herein (as Seaman of a Sailing Vessel.)

उसकी पञ्चान पत्र संख्या है **MMNV - 359**
His identify card No. is

यदि नवीकरण नहीं किया तो वैधता _____ तक वैध।
Valid upto **31-3-88** only, unless renewed.

भारत सरकार के अधिकार द्वारा जारी किया गया।
Issued under the authority of the Government of India

तारीख : **31-3-88** हस्ताक्षर *sd/-*
Date: Execut v. Signature

पंजाब : **Mumbai** पोस्ट ऑफिस, मुंबई-कुच्छ
Port: Post Office, Designation and Stamp

* (यह संख्या बही होगी जो पञ्चान पत्र संख्या के अंदर की ओर दी गयी है।)
(The card number shall be same as on inside cover proceeding.)

नाविक का नाम (पास) **Jusub mamad**
Name of the Sea man (Sails)

पिता का नाम **Mamud gulmamud**
Father's Name

जन्म तारीख (यदि ज्ञात हो) **10-12-1948**
Date of birth (if known)

जन्म स्थान **Mota-sulaya Mumbai-Kutch**
Place of birth

स्थायी पता **Mota-sulaya Mumbai-K**
Permanent Address

ग्राम **Mota-sulaya** डाक पर **Mumbai**
Village Post Office

थाना **Mumbai-Kutch** जिला **K.**
Thana District

राज्य **Gujarat**
State

राष्ट्रीयता **Indian**
Nationality

धर्म **Islam**
Religion

ऊँचाई Height	रंग Colour of	वदन Complexion
फुट 5:6 Feet	इंच 6 Inches	Brown

भिन्नता चिह्न
Distinguishing Marks

1 आँखों का Eyes	2 बालों का Hair
Blue	Black

उत्तराधिकारी का पूरा नाम, पता और स्थायी पता
Full name, relationship and permanent address of next of kin.
Rukiabai Jusub - wife

ग्राम **Mota-sulaya** डाक पर **Mumbai**
Village Post Office

थाना **Mumbai** जिला **Kutch**
Thana District

राज्य **Gujarat**
State

नाविक के हस्ताक्षर/बायाँ हाथ के छाप के प्रिंट की मिलावट
Signature/L.H.T. Impression of Seaman.

Passport details of captain of 'Khairat Oman'

After support from local Embassy staff from a number of countries, some official co-operation was received and the delegation was able to interview Bamakramah. However, even then they were refused permission to go to Khor Fakkan port because it was a "restricted area". In fact Khor Fakkan is a small dhow port with a new container port. The 'Khairat Oman' had berthed alongside the customs berth, an area with open access.

This incident could have provided the Tanzanians with valuable information in their attempt to tackle

poaching and ivory dealing. The lack of co-operation from the UAE officials demonstrated the attitude of their Government to the theft of Tanzania's natural resources by individuals resident in the UAE.

Bamakramah admitted "I ordered 3 tonnes of ivory from Tanzania but the Captain brought only 1,740 kg...after leaving the coastal strip of Tanzania the dhow did not anchor at any of the ports. They used small dhows to transport the ivory from where it was stored and properly kept to 'Khairat Oman'."

Ivory carving factories

On 7th February 1989 EIA entered the 'Coral Jewellers' in Ajman, an ivory factory employing skilled Chinese and semi skilled labour from the Indian sub continent. It was Chinese New Year and only one Chinese worker was left behind, the rest were in Hong Kong and Singapore celebrating. The semi skilled labour were working on drilling machines making ivory beads for necklaces. There were 13 drilling machines in two rooms.



Inside Poon's 'Coral Jewellers' ivory factory, Ajman, Feb. 1989.

The staff became very agitated by our presence and a Bangladeshi man explained that we were not supposed to be there. Meanwhile the Chinese man, who spoke no English, ran out of the shop and returned ten minutes later with two telephone numbers written on a scrap of paper. There were (5) 443720 and (3) 685343 ('Tat Hing Factory' in Hong Kong and shop in Kowloon - both owned by the Poon family).

For the next twenty minutes he continuously tried to dial these numbers. Meanwhile other workers explained that his boss was "Mr Poon...one week come back...(ivory) going to Hong Kong." In a corner a box full of ivory beads was marked "Fung Fcty": this is the Poon factory in Singapore.



Inside 'M.K. Jewellery Factory' in the Free Zone, Dubai, April 1988.

Following the registration of stockpiles of ivory in Burundi, Singapore and Belgium, the illegal traders had increased capital to invest in carving operations. Anticipating future developments and fully recognising the potential for huge profits and increased power to be gained from exploiting worked ivory, they moved into the UAE. In December 1986, George Poon obtained a licence for the 'Dubai Ivory Factory' in the Jebel Ali Free Trade Zone in Dubai. Three months later he opened a second carving factory called 'M.K. Jewellery'. This second factory was run by another member of the family, Sam Poon. About 65 Hong Kong Chinese carvers were brought to Dubai and housed in Jebel Ali village and Dubai. In addition to this, semi-skilled workers from the Indian sub continent were also employed. The factories worked from early in the morning to midnight.

These factories received regular shipments of ivory from Burundi and other countries throughout 1987. Documentation at the Free Zone shows that ivory was shipped by air from Bujumbura on **Lufthansa** and **Ethiopian Airways** with country of origin stated as Tanzania. In addition to this containers of ivory were shipped into Port Rashid or by dhow to Hamriya Port, both in Dubai. Ivory was exported to Singapore, Taiwan, South Korea, India and Hong Kong. All the ivory sent to Singapore was consigned to different people at 71 Ayer Rajah Crescent, No. 06-14, Singapore: the address of 'Fung Ivory', owned by the Poon family.

121 LXH - 25026271

121 - 25026271

Shipper's Name and Address DUBAI IVORY FACTORY, P.O. BOX 16792, DUBAI, U.A.E. C/O GULF EXPRESS FREIGHT DUBAI		Shipper's Account Number		Not negotiable Air Waybill (Air Consignment note) Issued by BRITISH CALEDONIAN AIRWAYS LIMITED Caledonian House, Crawley, West Sussex England, United Kingdom RH10 2XA Member of International Air Transport Association		
Consignee's Name and Address MR. CHAN PIK WAH, 44 HUNG SEK ROAD, TAI PAT YUEN, HUNG SIU KUI, YUEN LOHONG N.P., HONGKONG. TEL: 758003.		Consignee's Account Number		It is agreed that the goods described herein are accepted in apparent good order and condition (except as noted) for carriage SUBJECT TO THE CONDITIONS OF CONTRACT ON THE REVERSE HEREOF. THE SHIPPER'S ATTENTION IS DRAWN TO THE NOTICE CONCERNING CARRIER'S LIMITATION OF LIABILITY. Shipper may increase such limitation of liability by declaring a higher value for carriage and paying a supplemental charge if required.		
Issuing Carrier's Agent Name and City DHAP, DUBAI		Accounting Information LPO: 20174/88.		Copies 1, 2 and 3 of this Air Waybill are originals and have the same validity.		
Agent's IATA Code 86-4-7291		Account No.		Declared Value for Carriage NVD		
Airport of Departure (Addr. of first Carrier) and requested Routing DUBAI		Declared Value for Customs		Declared Value for Customs		
to by first Carrier Routing and Destination HKG BR		Currency ADH		Declared Value for Carriage NVD		
Airport of Destination HONGKONG		Amount of Insurance		INSURANCE - If carrier offers insurance and such insurance is requested in accordance with conditions on reverse hereof indicate amount to be insured in figures in box marked Amount of Insurance.		
Handling Information 3 CARTONS / ADDR. CU TOM NO 020371. PLS NOTIFY CHEE ON ARRIVAL. LOC: BRH. I'TZ 711dt. 21-3-88.						
No. of Pieces RCP	Gross Weight	Rate Class Commodity Item No.	Chargeable Weight	Rate Charge	Total	Nature and Quantity of Goods Incl. Dimensions or Volume
3	174.0	X	174.0	AS AGREED		BONE BEADS AND IVORY JEWELLERY AND CARVINGS. DIM: 28x17x11"/2 18x17x11"

Air waybill showing ivory from Poon's factory consigned to Chan Pik Wah, Hong Kong, March 1988.

Shipments to Hong Kong were carried by **British Caledonian Airways** to Chan Pik Wah, at a residential address, or Chan Lim To, at a machine shop 'Africa Hydraulics' owned by 'Eddie' Chan. Both these addresses were used by the Poon family and the ivory ended up in one of their Hong Kong factories or shops. EIA obtained evidence that 1,250 kg of worked ivory was shipped on this route in about seven separate shipments each month for much of 1988. **Cargolux** airline regularly flew ivory to Taiwan and South Korea.

In addition to these factories, others were set up by other Hong Kong traders in Dubai. At one time six factories were believed to be operating.

In September 1988 the Poon factories in the Free Zone closed down. The operations were moved to another Emirate: Ajman. Here small units were rented, later to be expanded. In the first five months of 1989 the Ajman factories expanded from three units to twelve units and operated under the names of 'Pearl Workshop', 'Coral Jewellers Manufacturers' and 'Ajman National Handicraft Factory'. Ivory was still exported in the name of 'M.K. Factory', with the address changing to PO Box 1807, Ajman, UAE. Ivory was sent to Hong Kong, Taiwan, Singapore, Germany and Belgium.



'Belhon Trading' ivory factory, Dubai, May 1989. Ivory sent to Hong Kong, Taiwan and Japan.



'Fung Factory', the Poons' Singapore factory and the destination for ivory from the UAE, March 1989.

Other factories have also operated in Dubai. 'Belhon Trading', owned by Abdulla Mohamed Belhon but financed from Hong Kong, worked ivory for two years. Eight employees worked smuggled ivory into ivory seals and jewellery. Enquiries revealed shipments on **Air Zimbabwe** and a crate marked up "Made in Burundi, KeeLung, Taiwan."

The Hong Kong traders were once again steps ahead of international efforts to control them. Instead of sending all their shipments direct to Hong Kong, they developed other staging posts: Singapore, South Korea and Taiwan. By spreading their influence, the scale of their operation could easily be underestimated, and they would have newly developed contacts in anticipation of further restrictions.

SINGAPORE STAGING POST FOR HONG KONG

The attitude of the CITES Management and Scientific Authority came as a surprise. First the security check through immigration before our meeting - and then their lack of interest in the wildlife trade. Although we described ivory imports from the UAE and methods that the traders were using to circumvent CITES, the officers were uninterested, suggesting that these were problems for CITES to sort out: **"We are concerned with the big issues, like rabies in dogs and cats, not with details like these."** The fact that Singapore did not require CITES import permits for worked ivory did not bother them at all. Their attitude was that if they changed their laws the traders would simply move elsewhere.

The two officials were hostile to any foreign interest in wildlife trade in Singapore, and considered wildlife groups and journalists to be interfering. They considered that everything was fine in Singapore and boasted that they had just passed legislation to bring CITES into Singapore law.

This country has played an important role in laundering ivory into Hong Kong for the last six years. Traders set up here to circumvent CITES and a number of companies were established after 1983, at the same time as the ivory trade in Macau.

Traders from Hong Kong moved to Macau to use it as a staging post for poached tusks going into Hong Kong. The customs data for raw ivory imports for Macau show a sharp increase in trade starting in 1983. Traders are reported to have admitted that countries of origin are falsified on larger shipments, and the ivory came from Dubai. At its peak in 1985, Macau import statistics show total raw ivory imports of 97,272 kg, 91,223 kg of which is recorded to have come from Uganda. This was probably ivory from Burundi via the UAE.

Singapore customs' ivory statistics include other products, but it is fair to assume that most of the imports from Africa and the UAE were ivory, especially because of their high stated value. Trade sources confirm this. Imports increased considerably in 1984 when about 93 tonnes of ivory were imported. In 1985 this had risen to 164 tonnes and in the peak year of 1986 recorded imports were 285 tonnes.



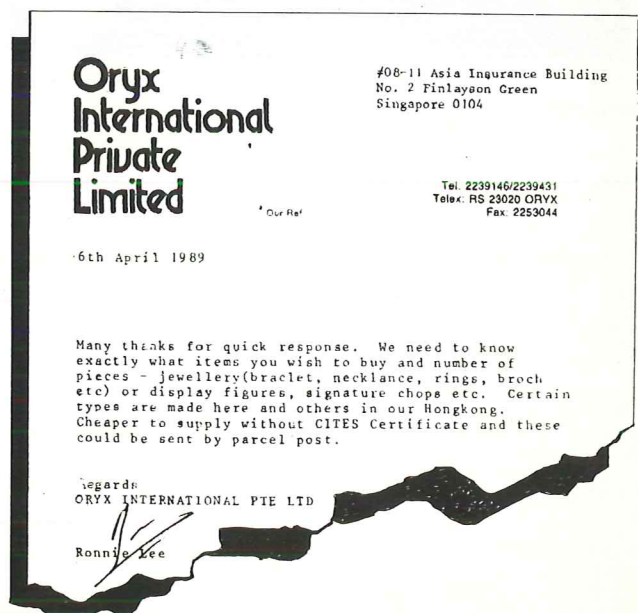
Tusks owned by 'Sun Cheong' in Singapore, part of the 1986 stockpile.

This peak was reached because the trade understood that the CITES Secretariat's registration of poached ivory would be an amnesty, even though members of the CITES Standing Committee were not aware of this at the time. The trade therefore exploited the situation to the full, flooding Singapore with ivory stolen from Africa. In this year 223 tonnes were imported from Tanzania. It is understood that this ivory was NOT part of the registered stockpile, but was traded outside the system.

When Singapore joined CITES in November 1986, the stockpiles of over 270 tonnes of raw ivory (almost 30 tonnes of worked ivory) were registered by the CITES Secretariat. The value of this ivory doubled overnight, providing its owners with windfall profits of millions of dollars.

Recent developments in international trade show how the beneficiaries of this registration have built on these profits by continuing to manipulate the trade with the power they gained through ownership of the stocks:

- 1) By withholding raw ivory from the Hong Kong trade, they have forced the price of ivory up and fuelled poaching.
- 2) By using profits gained through the CITES registration they have created carving businesses in Dubai and Taiwan and continued to operate from Singapore.
- 3) By carving registered stock in Singapore they have exported ivory to Hong Kong without permits and 'applied' the permits to new ivory smuggled into Singapore by container or overland through Malaysia.
- 4) By smuggling registered stock to Hong Kong in containers, with permits available in case it is detected, they have operated a risk free smuggling route. The permits can be used again and again.
- 5) By using companies already established in Singapore to continue to circumvent CITES. One method is to buy 'ivory fragments' for bead manufacture for US\$20/kg with documentation from Hong Kong. The Management Authority expects only 5% wastage and yet it can be up to 40%. The balance - up to 35% - on the permits can be used to import worked ivory from the UAE.
- 6) By exploiting the fact that Singapore still does not require permits for worked ivory. Imports from the UAE and other countries enter Singapore, sometimes via intermediary countries to conceal the origin of the worked items.



Fax from Singapore to the UK offering ivory without CITES permits, April 1989.

The importance of the 1986 registration/amnesty process in fuelling poaching of elephants in Africa cannot be overstated. The owners of most of the stock were three companies representing Hong Kong trade interests. It has been reported that K.T. Wang owned over half of the stock and that the Poon family also owned some of it. The companies that exported the stock were 'Domus Development', believed to be a Poon 'front' company run by Wong Ka Lok from Macau, 'Chatelet Trading' with K.T. Wang as a director and shareholder, and 'Sun Cheong Ivory Industries' owned by the Lai family of Hong Kong. It is significant that these three groups, by their ownership of the stockpile in 1986 were seen to be guilty of dealing in poached ivory, and now dominate international ivory trade.

The Hong Kong ivory trade in Singapore

The entire trade is dominated by Hong Kong interests which set up in Singapore to avoid CITES so they could continue to deal in poached tusks. They have succeeded in using Singapore as a staging post for worked ivory and a transshipment point for raw ivory. A Hong Kong trader explained that if there was any trouble getting ivory into Hong Kong after the August 1988 requirement for permits for worked ivory imports, then he would ship

his Dubai ivory to Singapore via Malaysia. He could then use one of a number of other methods to get the ivory into Hong Kong.

The Singapore contacts made in the early 1980's by Hong Kong traders have proven invaluable over the years. The trade is totally dominated by the families that benefitted directly from the 1986 amnesty and most of them can be shown to be using their position to continue to circumvent CITES.



Residence in Faber Crescent, Singapore, used as destination address for ivory from Dubai.

The 1989 Singapore Ivory Trade:

- **FUNG IVORY:** Owned by the Poon family and their associates, this company regularly deals with other Poon companies. It has been the destination for a great deal of the ivory from the UAE. In 1987 over 39 tonnes of ivory is shown in Customs statistics to have been exported from the Poon factories in Dubai to Singapore although no such record has been made in Singapore. Documents in the Jebel Ali Free Zone in Dubai confirm huge shipments to Fung Ivory using different contact names including Sally Ong, Johnny Kiong and Siu Sek Kong.
- **TAT HING INVESTMENT PTE LTD:** Established in January 1988 by the Poon family and believed to invest money from the ivory business in property in Singapore.
- **SHUN YAN JEWELLERY & CRAFT PTE LTD:** All directors are Poons including Poon Chi Kong who ran one of the factories in Ajman, UAE. The Shun Yan business card gives Poon Chi Naug's (Danny) address in Hong Kong.
- **KINGDOM TREASURE PTE LTD:** This company is also owned by members of the Poon family and is linked to 'Hong Kong France' in Paris.
- **YING FATT TRADING CO PTE LTD:** Also owned by Poons with Hong Kong connections.
- **DOMUS DEVELOPMENT PTE LTD:** Owned some of the 1986 stockpile and believed to be a front company for the Poon family.
- **CHATELET TRADING PTE LTD:** Owned most of the 1986 stockpile. Shareholders are K.T. Wang and Li Ka-Yan who shares ownership of **SINGAPORE IVORY ARTS** with Mdm Poon Wing Chun whom he lives with.
- **SUN CHEONG IVORY INDUSTRIES PTE LTD:** Owned by the Hong Kong Lai family who own 'Kee Cheong' and 'Yat Cheung'. Exported some of the 1986 stockpile. Reported to have operated out of Dubai. Also operating from this address until October 31st 1988 is **SENG KEY IVORY**.
- **KYOMI HANDICRAFT & TRADING:** Based in Hong Kong and Singapore, it has strong association with the Poon family. Recently changed address with its old Singapore address taken over by **SUN MAY ART INDUSTRIAL PTE LTD**. This company has been receiving shipments of semi carved ivory from Ajman, UAE via Belgium and Germany.



Ivory beads packed in a box marked 'Fung Fcty' in one of Poon's UAE factories, Feb. 1989.

The importance of Singapore to the Hong Kong syndicates has been firstly to give them the wealth and power to take control of the market, and secondly to exploit the new CITES system through Singapore to 'legitimise' poached tusks. They have achieved both, adding to the African elephant disaster.

TAIWAN

On 14th August, 1989 customs officials in Taipei seized ivory and skins smuggled from Swaziland to Taiwan. The shipment of 169 tusks (raw and carved), 577 carved ivory items and 11 lion skins was sent by 'Hou Import and Export Co.' in Swaziland to 'Himmar International Co.', Taipei. It has since been discovered that 'Hou Import and Export Co' does not exist, but a 'First Import and Export Co' has the telephone number supplied with the shipment.

Throughout 1989 rumours have circulated of large shipments bound for Taiwan, but they have all avoided detection. It helps to demonstrate the significance that Taiwan has taken on in the ivory trade. As a state without international recognition, it is no surprise that it has built up trading relationships with South Africa, another country with an uneasy international reputation. Taiwanese businessmen have been encouraged to set up businesses in the independent homelands. Southern African poached ivory seizures have increasingly been destined for Taiwan.



Endangered species openly displayed in Taipei, July 1989.

The importance of Taiwan for the illegal ivory trade has grown since Singapore joined CITES. It provided traders with another haven for carving poached tusks in a Chinese society. Carving factories developed during 1986 and raw ivory flooded in, reaching at least 80 tonnes in 1987. In addition to ivory trading, Taiwan is notorious for other trade in endangered species. Recent studies have revealed the open availability of rhino horn powder in pharmacies throughout Taiwan.

From documentation acquired by EIA it is clear that Taiwanese Customs data does not include some imports from the UAE. For instance, companies known to have received ivory from UAE factories are not listed as having imported ivory. The exact quantities under-declared are

unknown, but basing an estimate on the size of the UAE factories, they must amount to tens of tonnes.

Different sources describe at least ten factories set up by Hong Kong traders in 1986/7 employing Hong Kong carvers. During this period it is known that the UAE operations exported at least 80 tonnes to Taiwan.

172 DXB 07590660	
Shipper's Name and Address DUBAI TRADE AND TRUST CO P O BOX: 9243 DUBAI UAE TEL NO: 373030	Shipper's Account Number 003048
Consignee's Name and Address SUMMER INTL CO LTD 20 NANKING E ROAD, SEC 2 TAIPEI TAIWAN TEL 2-5633973	Consignee's Account Number
Issuing Carrier's Agent Name and City D N A T A DUBAI	
Agent's IATA Code 86-4-7291	Account No.
Airport of Departure (Addr. of first Carrier) and requested Routing DUBAI.	
to TPE	By first Carrier CARGOLUX
Routing and Destination	to by
Airport of Destination TAIPEI	Flight/Date For Carrier Use only
Handling Information 13 W BOXES ONLY	
Nature and Quantity of Goods (incl. Dimensions or Volume) IVORY CHOPS WORKED CONSOLIDAT ION DIM: 15X18X12/13N	

Air waybill showing ivory from the Al Fayed's 'Dubai Trade and Trust' consigned to Taiwan, Dec. 1988.

Taiwan has continued to be a significant entrepot for ivory destined for Hong Kong and Japan. Evidence from the UAE shows that regular shipments of seals and other ivory products have been sent to four companies in Taiwan:

- 1) 'Fure Dragon Ivory Artistry' receiving ivory from 'M.K. Factory', the company still used by the Poons to export ivory from their Ajman factories.
- 2) 'David and Winson Enterprise Company' also receiving ivory from 'M.K. Factory'. This 'company' is a residential address.
- 3) 'Summer International Co. Ltd', a freight forwarding company, receiving ivory shipped from the UAE by 'Dubai Trade and Trust', a company owned by the Al

Fayed brothers. In December 1988 at least 800 kg was sent.

- 4) 'Advance Jewel' owned by William Chan has received regular shipments from 'Belhon Trading' in Dubai. It has a staff of about 30 employees with exports (according to the Board of Foreign Trade) valued at US\$1.2 million in 1988.

Only the first and last of these companies is listed by the Taiwanese authorities as having imported ivory, and in a one month period monitored in 1988 the documented quantities sent from the UAE to 'Fure Dragon Artistry' exceeded the imports from the UAE recorded by this company for the entire year.

It is significant that three other companies based in Taiwan are owned by the same interests that own 'Fure Dragon Ivory Artistry' which deals with the UAE. They are 'Hui Ho Co Ltd', 'Ivory Country Industry Co Ltd' and 'God of Wealth Co Ltd'. Together with 'Advance Jewel' these companies accounted for 75% of the recorded raw ivory imports in 1987/88.

CARGO MANIFEST (I.C.A.O Annex 9) *****				
For : CARGOLUX				
Regn: Y		Flight no & date :		
Origin: DUBAI		Point of unloading : TAIPEI		
No. of Pieces	Description Of Goods	Gross Wt(Kg)	Org	Des
AIR...CARGO				
P6P 8037 CV				
136	1 COMPUTER PARTS	18	DXB	TPE
3151	3 IVORY TUSKS	1594	DXB	SEL
2311	1 PRINTED MATTER	53	DXB	TYO
-----	5	1665		
-----	TOTALS	1665		
=====		=====		

A cargo manifest showing tusks consigned to Taipei from Dubai shipped by Cargolux, April 1988.

Imports & Exports

As has been shown the statistics published by Customs are incomplete but nonetheless indicate some of the trade. In 1988 worked ivory officially dominated the trade with 26.786 tonnes were exported (almost 9 tonnes going to France and 5.438 to the USA). In the same period 18.333 tonnes were imported with 14.612 tonnes from the UAE and 2.815 tonnes from South Africa. In the same period over 5 tonnes of raw ivory is recorded to have been imported.

In the first four months of 1989 raw ivory waste is shown to have been imported from Cameroon, the UAE, and Tanzania. In the same period worked ivory and articles of ivory were imported from the UAE, Hong Kong, India and the USA. In addition these ivory exports have been to Japan, France, Singapore, Italy, the USA, Australia and one tonne was unidentified. The export to the USA is in contravention of the USA's moratorium on ivory imports from non CITES parties (which includes Taiwan) imposed on December 24th 1988.

TAIWAN CUSTOMS IVORY EXPORT AND IMPORT STATISTICS

	1988	
	IMPORTS TONNES	EXPORTS TONNES
Australia	-	1.952
Belgium	-	0.122
Canada	-	0.234
Cameroon	0.570	-
Congo	0.065	-
France	-	8.876
Hong Kong	0.811	1.715
Italy	-	0.116
Japan	-	2.600
Korea (sic)	-	0.042
Malta	-	0.172
Netherlands	-	0.419
Philippines	0.011	-
Ryukyu	-	0.016
Saudi Arabia	-	0.035
Singapore	0.173	2.804
South Africa	5.879	0.056
Spain	-	0.023
Sudan	0.729	-
Sweden	-	0.270
Switzerland	-	0.024
Tanzania	10.703	-
Thailand	-	1.260
UAE	14.612	-
UK	-	1.092
USA	0.064	5.438
West Germany	-	0.021
Zaire	0.015	-
Zimbabwe	0.506	-
TOTAL	34.136	27.287

	1989 (January - April)	
	IMPORTS TONNES	EXPORTS TONNES
Australia	-	0.750
Cameroon	0.105	-
France	-	8.750
Hong Kong	0.178	-
India	0.065	-
Israel	-	0.683
Italy	-	0.798
Japan	-	0.467
Lebanon	-	0.117
Nepal	-	0.238
Singapore	-	0.068
Tanzania	1.169	-
UAE	5.128	-
USA	0.040	0.299
TOTAL	6.685	12.170

The statistics for 1988 and 1989 include: articles of ivory, worked ivory materials, ivory powder and waste, ivory waste, ivory unworked or simply prepared but not cut to shape.

Taiwan has made a number of announcements concerning ivory bans, but so far they seem to make little difference. It is hoped that the most recent announcement of a ban from August 28th 1989 may be more effective. However, if past efforts to ban other endangered species products such as rhino horn are anything to go by, the Taiwanese trade looks set to continue to contribute to the African elephant disaster.



169 tusks, 577 carved ivory items and 11 lion skins from Swaziland were seized in Taipei on 14th August, 1989.

Conclusions and recommendations

African elephants will only gain increased protection when the consuming blocks of Japan, the USA and Europe, stop buying ivory. Continued ivory trading is incompatible with the conservation of elephants and therefore an immediate and total ban on the international ivory trade is an essential first step towards arresting the rapid decline in the number of African elephants.

Exemptions for the Hong Kong stockpile and the southern African elephant population would seriously undermine and devalue a ban and must not be supported.

The attitude that "unnecessary restrictions" should not be put on the ivory trade, lest it become too bureaucratic for the dealers, has contributed to the long history of failed attempts to control the international ivory trade. This presumption has greatly facilitated the illegal trade at the direct expense of elephant conservation.

The crisis for the elephant is symptomatic of what has happened, and is happening in CITES. At present, the burden of proof is on conservationists and scientists to demonstrate that a species is threatened by international trade to qualify for trade restrictions.

That burden of proof must be shifted squarely onto the shoulders of the would be exploiters: they must demonstrate that trade in a species or its products will not deplete the populations in the wild. This responsibility is ignored by the "quick buck" traders, who almost always ignore the interests of the countries of origin of such species.

This critical situation has been exacerbated by the "sustainable use" school of thought, which has been determined to show that the policy of sustainable use - as far as international trade is concerned - can be shown to work.

Unfortunately, sustainable use does not work except in the rarest of circumstances. Such presumptions in favour of trade are contributing to the rapid depletion of many species in the wild. Those who ignore the evidence

that sustainable use is a terrible failure - as exemplified by the African elephant disaster - must now accept the clear evidence that the policy is not working for most species.

The frivolous and unnecessary exploitation of the world's wildlife is increasing the numbers of endangered species each year. CITES needs a radical overhaul to prevent trade in all species which are being depleted and to require would-be traders to demonstrate that the effects of trade do not deplete species in the wild.

Once the ivory trade is banned, the ivory consuming nations of the world must provide substantial aid to those African countries which demonstrate real political commitment to the conservation of elephants and to the ending of illegal ivory trading.

Japan, Britain through its responsibility for Hong Kong, Singapore and the United Arab Emirates, bear a special responsibility to provide substantial aid to African countries in their anti poaching efforts because of the involvement of the ivory traders in those territories and the damage it has wreaked on Africa's elephants.

The European Community, the USA and other countries must provide significant aid to the wildlife departments of Africa to protect their elephants and other wildlife. This aid needs to be financial - money to pay wardens and park staff, equipment - trucks, tents, uniforms and computers; and training.

In addition to this the records of key traders, such as those named in this report, should be examined by the relevant authorities in co-operation with Interpol. It is essential that their networks are destroyed.

These are the first steps to be taken in the fight to save Africa's elephants for future generations.

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20 September 1989

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This report is dedicated to all our friends in Africa who are working to save the African elephant from extinction. Their courage and determination are an inspiration to us all.

The cover shows elephants killed by poachers, Nov 1988/EIA.

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The Environmental Investigation Agency, 1989.

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2,000 African Elephants
have been killed each week
for the past 10 years.





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