

BACK IN BUSINESS



Elephant Poaching and the Ivory Black Markets of Asia



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Introduction	1
The Singapore Seizure	2
China's Emerging Ivory Market	13
The Impact on Elephant Populations	19
Illegal Ivory on the Move	22
Conclusions and Recommendations	24
References	25

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Above: Elephants in
South Luangwa
National Park, Zambia



*In Memory of Christine Stevens
1918-2002*

This report is dedicated to the memory of Christine Stevens the founder and President of the Animal Welfare Institute of Washington DC for over 50 years. It was Christine who first encouraged EIA to investigate the illegal ivory trade in 1987. She had a vision of treating animals and people with kindness and consideration and spent her life tenaciously pursuing her ideal. Christine was determined, motivated and had a fine sense of humour. She gave strength and inspiration to all those who had the good fortune to know her or work with her. She will be greatly missed and never forgotten.

Allan Thornton 17 October, 2002

Introduction

As the international community once again meets to decide the future of the elephant there are disturbing signs that demand for ivory products is on the rise. Widespread poaching in elephant range states is being driven by resurgent market demand in several Asian countries.

A catalogue of seizures in 2002, including the seizure of over six tonnes in Singapore, provides stark evidence of a renewed threat to elephant populations. The largest single seizure since the international ivory trade ban was agreed in 1989, this was only one of many consignments intercepted en route to the markets of the Far East. In April 2002 the Chinese authorities smashed a smuggling ring responsible for bringing 14 tonnes of illegal ivory into the country. In February 2002 the Tanzanian police seized 1,255 pieces of ivory in the capital Dar Es Salaam, the country's largest ever haul of poached ivory.

It is against this troubling background that five Southern African nations – Botswana, Namibia, South Africa, Zambia and Zimbabwe – are petitioning parties to the Convention on International Trade in Endangered Species (*CITES*) for legal sales of ivory, elephant products and live animals.

Proponents of a legal ivory trade claim that verification procedures exist to ensure that illegal ivory cannot leak into the system. Investigations by EIA into the principal ivory markets in Asia show this contention to be absurd.

The seizure in Singapore lifted the lid on a well-organised ivory smuggling network that had been operating, undetected, since the mid-1990s and which had successfully shipped huge amounts of ivory from southern Africa, much of it from Zambia, to China and Japan. Furthermore, investigations reveal that some of the individuals involved in the syndicate were involved in the ivory market of the 1980s, when legal trade prompted a catastrophic decline in African elephant populations.

In 1999 Japan was legally sanctioned to import 50 tonnes of ivory from Botswana, Namibia and Zimbabwe. The sale was allowed to proceed on the grounds that Japan, as the sole buyer, had a watertight system that excluded the possibility of illegal ivory entering its market. Yet documentation indicates that since 2000, those implicated in the Singapore



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ivory seizure were able to despatch five shipments to Japan.

EIA investigations into China's ivory retail market also reveal a total absence of meaningful control. Ivory products are widely available, despite the fact that legitimate supplies dried up a long time ago. In the years since a one-off sale of ivory was agreed by *CITES* in 1997, China has emerged as the main destination for smuggled ivory.

With this significant body of evidence in mind, it is imperative that the Parties to *CITES* reject proposals for further legal trade in ivory, which would reward an industry sustained by illegal supplies. Instead, stronger measures are urgently required to eliminate the black markets in Asia where the continuing demand for ivory, coupled with the relative ease with which controls are circumvented, does not bode well for the long-term stability of elephant populations.

The recent rise in ivory seizures is a disturbing echo of the 1980s, when poached ivory formed the bulk of legal trade and caused the decimation of elephant populations in many range states. To allow further legal ivory sales against the present backdrop of rising demand and unregulated markets would inevitably lead to history repeating itself.

Allan Thornton
EIA Chairman
October 2002

Of the 19 suspected ivory shipments from the syndicate since 1994, 15 were destined for Singapore

The Singapore Seizure

After almost two weeks at sea, the cargo ship *MOL Independence* docked at Singapore on 27th June 2002, its first port of call since sailing from Durban in South Africa. Every day around 40,000 containers pass through Singapore, one of the world's busiest ports, but one of the containers offloaded from *MOL Independence* held a unique consignment.

According to the Bill of Lading, container number MOLU 2857596 was carrying six wooden boxes of stone sculptures from a company in Lilongwe, Malawi, to a company in Singapore¹. However, advance intelligence prompted the Singaporean Authorities to inspect the container and instead of sculptures they found contraband. Tightly packed into six wooden crates were 532 elephant tusks and over 40,000 blank ivory hankos (traditional Japanese name seals)². Weighing in at 6.2 tonnes, and equivalent to as many as 600 elephants, this is the largest seizure of ivory since the international ivory ban was agreed in 1989.

Detailed investigations carried out by EIA

reveal this was not an isolated incident, but one of many such shipments made by a well-organised ivory smuggling syndicate that has been operating with impunity since 1994. It has successfully smuggled tens of tonnes of illegal poached ivory from Africa to the Far East, with the Singapore seizure marking its first operational setback. Such a brazen attempt to smuggle over six tonnes of ivory in a single shipment, with little effort to conceal the contraband, indicates a confidence bordering on arrogance engendered by eight years of successful smuggling.

Of the 19 suspected ivory shipments from the syndicate since 1994, 15 were destined for Singapore and four were destined for Guangzhou in China. However, information gathered in southern Africa and Singapore by EIA confirms that the final destination for many of the shipments routed to Singapore was Japan.

In order to operate undetected for so long the smuggling network has used a series of pseudonyms, fake companies, and false trails to

Right: Part of the six tonnes of ivory seized in Singapore in June 2002



© AVA

cover its tracks. Analysis of business registers and shipping records reveal that the network is controlled by a group of shadowy Hong Kong-based ivory dealers, active in the business since the mid-1980s. Some of the key players can also be linked to the ivory trading empire established by the notorious Poon Family, who used various loopholes in the ivory trade system prior to the international ban to amass a fortune built on poached ivory³.

These ivory traders have gone from exploiting loopholes in the law to outright black market ivory smuggling in order to continue to supply the insatiable demand for ivory in Japan and China. If the Singapore authorities had not been alerted, the six tonnes of illegal ivory would probably have followed the pattern of previous shipments and successfully been subsumed into the 'legal' ivory market of Japan, purportedly the most regulated in the world.

Credit for the seizure and the disruption of one of the world's biggest ivory syndicates is due to a handful of dedicated enforcement officers and investigators from the *Zambian Wildlife Authority (ZAWA)*, the *Anti-Corruption Bureau (ACB)* in Malawi, the *Lusaka Agreement Task Force (LAFT)* and



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Singapore's *Agri-Food and Veterinary Authority (AVA)*.

Whilst there have been arrests connected with the syndicate in Malawi, the key instigators remain at large, free to enjoy the profit from their illicit activities and removed from the corruption and violence that ivory poaching continues to fuel in many parts of Africa.

Above: Elephants in South Luangwa National Park, Zambia

The Lilongwe Pipeline

The seized ivory, like many previous consignments, began its journey in Southern Africa in Chipata, a dusty, trading hub in eastern Zambia, close to the Malawian border. Poached from throughout Zambia, particularly the nearby South Luangwa National Park, the ivory was gathered here which is also, allegedly, a route for poached ivory from other southern African countries like Zimbabwe and Mozambique. It was then smuggled across the porous border into Malawi by road and made its way to the capital city of Lilongwe around 100 kilometres away. The nucleus of the network was based around an ivory factory in the Kawale district of town where the ivory was inventoried and packed for shipment. This was also where the buyers from the Far East came to inspect the consignment and complete payment.

Once stowed in a container the ivory moved across a series of border crossings to eventually reach the South African port of Durban and in this instance, it was routed via the port of Beira in Mozambique and then on to Singapore.

To date, the syndicate have often used the same freight company, *Manica*, which operates across Southern Africa. From Durban the containers were then dispatched to Singapore or southern China, often aboard vessels owned by the Japanese company *Mitsui OSK Lines*.



Zambia – Ivory Poaching

The events leading to the Singapore seizure began a continent away and nine months earlier with the arrest of a notorious ivory poacher in Mfuwe, gateway to Zambia's flagship *South Luangwa National Park*.

Benson Nkunika was well known in the area as an active ivory poacher and was initially apprehended in November 2000 by ZAWA game scouts for illegal possession of firearms and an illegal ivory trophy. Rather than take Nkunika to court, and because he pleaded poverty as the motivation for his crime, ZAWA decided to employ him as an intelligence source. Yet the poacher turned 'trainee scout' soon reverted to his previous profession.

In April 2001 a private anti-poaching unit operating in the park received information that Nkunika was active again. Set up and funded by concerned individuals and private enterprises as a back-up for the flailing ZAWA, the *Rapid Action Team Zambia (RATZ)* managed to place one of their scouts in the poaching group organised by Nkunika. The undercover operation resulted in his arrest and detention in

Below right: Sindikani Banda, one of the main players in trafficking ivory from Chipata to Lilongwe

Below: Prolific Zambian poacher, Benson Nkunika, arrested by anti-poaching team



May at ZAWA's local headquarters in Mfuwe⁴.

While in custody Nkunika revealed the existence of widespread corruption among ZAWA staff, and alleged that he had been contracted by the then warden of *South Luangwa National Park*, Rodgers Nkhoma, to poach 100 elephants from the park and surrounding areas. At the time of his arrest he said he had killed 58 elephants. Nkunika also described how the ivory was moved to Lilongwe in neighbouring Malawi via Chipata. However, in spite of efforts to bring Nkunika to justice, a series of court adjournments, suspected cover-ups and red tape meant that he was still awaiting prosecution in 2002. During a reshuffle in late 2001, Rodgers Nkhoma was transferred and a new warden appointed.

The scale of poaching in South Luangwa prompted the new warden to probe the situation. He was particularly concerned by an incident in November 2001 when three elephants were killed close to ZAWA's Mfuwe headquarters, suggesting that the poachers were privy to the planned movements of ZAWA scouts. The warden reported back to the Regional Manager who decided to conduct further investigations himself. Information obtained through local informants led him to believe that a major ivory poaching operation was active in the area and that it was being aided and abetted by several local ZAWA staff. He promptly assembled an investigations team comprising of ZAWA staff from outside the area and led by a Senior Investigator from Head Office.

One name that kept cropping up during the investigation was that of Chipata-based Sindikani Banda, responsible for trafficking the ivory from Chipata to Lilongwe. Informants alleged that Banda made regular collections of ivory from around the region by truck and moved the contraband across the sparsely populated border using farm tracks. The investigations team also heard persistent rumours about an ivory factory located in Lilongwe that was said to take delivery of ivory from the Chipata network. A joint raid was made on the factory in February 2002 by ZAWA investigators and staff from Malawi's *Anti-Corruption Bureau (ACB)*, resulting in the discovery of documents showing a massive and coordinated ivory trafficking operation.



Zambia's Poaching Problems

Zambia remains one of the world's poorest countries with a major national debt (the highest level of per capita debt in the world), a high level of corruption and a weak economy. There is no doubt that poaching – of all sorts – has been increasing steadily over the past few years and that poaching for meat, mostly done with snares, has risen dramatically. However, whilst opportunistic poaching of elephant occurs, most appears to be organised to some degree.

The new *Zambian Wildlife Authority (ZAWA)* was signed into law on 1st November 1999 and the complex transition to replace the former *National Parks and Wildlife Services (NPWS)* has been in process ever since. The aim of the transition is to turn *ZAWA* into a largely self-funding para-statal body, but internal wrangling, restructuring and conditions set by donor parties have resulted in long-term disarray. This has badly hampered anti-poaching activities, and the fact that *ZAWA* has twice in the space of a year been unable to pay its staff only exacerbates this situation.

There have been no nationwide elephant counts since the early 1990s and the total national estimate in 1996 stood at +/- 22,500⁵ depending on the interpretation of figures. Despite historically taking the precautionary approach, Zambia now wants to sell its ivory stockpile, yet its case is fundamentally flawed due to a chronic lack of enforcement, dubious figures and rising poaching;

- Zambia's entire stockpile, consisting of 8.9 tonnes of ivory, was destroyed in 1992. By 1998 it was reported to be 8.7 tonnes⁶. Now, in 2002, it is said to have reached more than 17 tonnes⁷. Having taken seven years to accumulate 8 tonnes, it has taken less than four years to double.
- EIA has received reliable information regarding poaching in the National Parks of *South Luangwa*, the *Lower Zambezi* and adjacent *Chiawa Game Management Area* and also in *Kafue*, Zambia's oldest and largest National Park. By 1996 *Kafue National Park's* elephant population had recovered to around 4,500⁸, but by 1999 poaching had returned to the park and by the end of 2000 the numbers were as few as 2000 – a catastrophic decline of more than half the population⁹.
- Zambia's proposal states that only 13 elephants were poached in 2001, and that none had been poached in 2002. It reported 16 elephants poached in 2000 although a *USAID/WRMU* abundance survey published in December 2000 states that 156 elephants were poached in and around *Kafue National Park* alone that year⁹. Contrary to Zambia's statistics, EIA has received multiple reports of poaching incidents that have taken place in Zambia this year.

**By 1996
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Left: Poached elephant shot in South Luangwa, Zambia 2001

© RAZZ, Zambia

The Singapore Seizure

Right: RATZ removing a snare in South Luangwa, Zambia 2001



© Mary Rice/EIA

The target factory, in the Kawale 1 district of Lilongwe, was a family business called *Allena Curios*. The family patriarch MacDonald John Gwedeza Zulu had run the business until his death in June 1998, after which it was taken over by his daughter Allena and latterly by her brother Gift Gwedeza.

Despite the illegal nature of his ivory dealing activities, MacDonald John Gwedeza Zulu was a meticulous record-keeper. A series of receipt books from 1994 to 1996 yielded information implicating Sindikani Banda and the involvement of buyers from the Far East. Tables of figures show amounts of ivory received and the value according to a weight system. Names of buyers were written beside the figures – the names Chow, Pang and Peter Onn featured regularly. One notebook revealed that almost ten tonnes of ivory had passed through MacDonald John Gwedeza Zulu's hands between February and September 1996, and was bought by Pang and "Peter" for \$185,000. An indication of the final destination for the smuggled ivory came from telephone and fax contact numbers for the main buyer, Peter Onn, in Singapore, Japan and Hong Kong, scribbled in a notebook.

The investigations team now had a clear idea of the scale of the ivory poaching and trafficking in the region, and evidence implicating the main player in Chipata – Sindikani Banda. A receipt from 1996 showed payment of \$7,500 to Banda for 500kg of ivory and a number of notebook extracts state US dollar amounts paid to Nkunika, Banda, William Shawa and Joseph Chibesa – all of whom were involved in the ivory poaching ring in South Luangwa.

The ZAWA investigators returned to Mfuwe and began questioning those involved in the

Right: Page from Allena notebook detailing the sale of over ten tonnes of ivory between February and September 1996.

zulu = us\$ 30000 + 40000 + 15000 + 50000 = 135000
 ALA = 40000 + 10000 = 50000

Date	under 3	3-10K	10K up	Total	Remarks
96-28	243.1	1249.3	955.4	2447.8	PANG HAND.
2-9	131	523	108.7	762.7	PANG
96-22	191.5	717	317	1225.5	peter
6-23		65.2	485	550.2	"
96-9-14	336.2	832.8	439.7	1608.7	peter
9-7-9	281	667.6	455.1	1403.7	"
	81	675.7	130.4	887.1	"
9-26	55.7	194.1	603	852.8	"
"	214	691.8	226.1	1131.9	"
Total =	1533.5	5616.5	3720.4	10870.4	
-	378.1	2353.3	1482	4213.4	ALA
	1155.4	3263.2	2238.4	6657	→ zulu

Top left: Notebook showing prices paid in 1998 for raw ivory by the Allena factory in Lilongwe. Highest price of \$50 paid for tusks over 10kg.

Top right: Notebook detailing ivory transactions in Lilongwe during June 1997.

Bottom left: Letter to Banda from ZAWA scout Joseph Chibesa concerning payment for 184kg of ivory.

Bottom right: Receipt book from Allena's factory showing payment to Sindakani Banda of \$7,500 for tusks in April 1996.

v life = 512.4
 395.0 kg x 1.5 = 592.5
 512.4 - 592.5 = 162.9
 From 11-4-96 New price
 3 under = \$25
 3-10 kg = \$40
 10 kg up = \$50

227.5	48.5	34.0	41.3	46.8
7.5	49.2	357	44.1	46.
210	47.8		45.	37.
	48.2		45.8	38.
	47.7		43.2	337.
	40.5		47.8	1296.
	40		48.6	259
	619.8	612-204	42.3	7583
	20.4		48.4	
	594.4		46.5	
	220.		41.5	
	814.4		43.6	
			47.6	
			46.6	
			972.1	

10th Mr. Banda
 From: JOSEPH CHIBESA
 DATE: 27th January, 2002.
 Seeing that I may face
 fearing to loose my items worth
 attempt to give any money to
 Mr. Shansa Dick has 54 kg and my
 186 kg: If they may trouble you please just give them
 according to their 54 kg. Then 132 kg has to be given
 direct to me. I have done so because they seem not
 to be trusted. I have so many problems which I want
 to solve immediately. Shansa Mr. doesn't have any
 items. These items belongs to me 132 and to Dick
 please please assist
 J. Chibesa

11-4-96
 MR. SINDIKANI BANDA
 MR. NIKOLASI MWALE
 KUWELIENGERA KWA pa 11-2-96
 tina chepetsako figure figure
 Soyemela inali 7506.7 - 6650.
 yotsala kuti ine ndibweze
 inali 856 US\$
 ZINARI motile
 under 3 26.4 x 6 on 23-12-95
 under 3 -
 3-10 17. x 12 = 204 US\$
 10 UP 145 x 16 = 2320. US\$
 12-2-96
 under 3 26.4 x 6 = 158. US\$
 3-10 132.8 x 12 = 1593. +
 10 UP 201.9 x 16 = 3230
 7505 -
 ticholse ngongole 6650
 Zoti ndinso bwezele 855
 11-2-96 ngongole yina 7000 US\$
 23-3-96 Amusale inanso 500 US\$
 ZONSE Pamodzi - - - 7500 US\$
 P.T.O ON PAGE 95

ivory network and conducted searches of Banda's house and other locations in Chipata. During these enquiries it was revealed that a further 13 tonnes of ivory was being gathered and that a container was being prepared for shipment to the Far East in Lilongwe. On 24th June 2002 a ZAWA investigator returned to Lilongwe to hunt for the rumoured container and its cache of poached ivory.

Lilongwe – Ivory Conduit

In Lilongwe the ZAWA representative was joined by a member of the Malawian *Anti-Corruption Bureau (ACB)* and an officer from the Nairobi-based *Lusaka Agreement Task Force (LATF)*, created to combat cross-border wildlife crime. The team set about questioning freight agencies in Lilongwe for details of any recent consignments to the Far East.

The first company visited was *Manica*, which operates a large container depot in an industrial estate on the outskirts of Lilongwe. *Manica* staff revealed that the company had acted as agents for a container destined for Singapore and despatched from Lilongwe in mid-May. At first glance the shipping bill for the container seemed in order, listing a consignment of six wooden boxes of stone sculptures from *Seng Luck Trading Company* to *Delight Harvest (Singapore) Pte. Ltd.*

Yet closer scrutiny revealed that *Seng Luck's* address was in Kawale, the same district as *Allena Curios*, the Gwedeza family business. It also transpired that *Seng Luck* was fictitious, and its contact details false. When the Customs Declaration Form for the container was inspected, it listed the exporter as *Allena Transport and Trading*, not *Seng Luck*. The investigators were convinced that they had found the illicit ivory, and just in time as the container was due to arrive in Singapore within the next couple of days. The authorities in Singapore were alerted and the seizure made on June 28th.

The Malawian *ACB* now began exploring the circumstances behind the shipment and discovered the following:

- A search of the Gwedeza company premises yielded documents showing a succession of suspicious shipments since the mid 1990s.
- Records indicated that the currency declaration for the export of stone sculptures was made by Hong Kong resident So Tat Wing.
- The paperwork for the shipment had been organised by Malawian Geoffrey Kulupajili and an Asian man called "Imoto".
- Kulupajili had hired a seven-tonne truck to collect six boxes from a private address and deliver them to a container in the *Manica* yard.
- The collection address was searched by *ACB* and tools for packaging and carving were discovered. The property was occupied by an 'Asian' man and his Malawian common-law wife, sister of Geoffrey Kulupajili, who told the *ACB* that he had fled the country.

SENG LUCK TRADING COMPANY
P.O. BOX 3318, KAWALE
LILONGWE, MALAWI.
TEL : (265) 722756

Mitsui O.S.K. Lines
COMBINED TRANSPORT BILL OF LADING

RECEIVED in apparent external good order and otherwise noted the total number of Containers enumerated below (**) for transportation from Place of Delivery subject to the terms hereof. One of the original Bills of Lading must be exchanged for the Goods or Delivery Order herein.

In accepting this Bill of Lading the Merchant agrees to all its terms whether printed, stamped or incorporated, notwithstanding the non-signature of the Merchant.

IN WITNESS whereof the number of Bills of Lading have been signed, one of which to be void.

(Terms of Bill of Lading copy attached)

Pre-carriage by: N/A
Ocean vessel: MOL INDEPENDENCE Voy. No. 9501B
Port of loading: DURBAN
Port of discharge: SINGAPORE
Place of delivery: SINGAPORE CY

AMOUNT: 75.00

43 Declaration
I/We ERNEST MSEU the undersigned of MANICA (MALAWI) LTD. (company)
Being the agent for the Principal ALLENA TRANSPORT & TRADING COMPANY (Import / Exporter)

Do declare that the information and particulars declared herein are true and complete to the best of my knowledge, abilities and belief and if anything is found to be false I/We shall be liable to prosecution.

Declared at: LILONGWE This 8th Day of May (month) 2002 (year)

Signature: [Signature] Tel: 710 166 / 519 FAX: 710 952 / 342

Above top: Shipping bill for the seized container listing fake company Seng Luck as the sender

Above bottom: Malawi customs form showing the real sender – Allena Transport and Trading



Above: Manica Freight Company, Lilongwe, Malawi was involved in transporting shipments for Allena

Based on the results of the investigation, Gift Gwedeza and Geoffrey Kulupajili were apprehended for their involvement in the despatch of the seized container. The enquiry had also thrown up significant information on a series of previous shipments likely to contain tens of tonnes of ivory over an eight-year period, all orchestrated through the *Allena* operation in Kawale. Freight and shipping records, and documents dating back to the mid-1990s detail a total of 19 suspicious shipments dispatched from *Allena*-related companies to the Far East as shown in the table below.

Shipments connected to Allena from 1994 to 2002

Singapore – Ivory Transshipment

Although the six-tonne shipment of tusks and hankos was intercepted in Singapore, the prosperous island-state was not the final destination for the illegal ivory, merely a staging post en route to what is historically the world's most lucrative ivory market – Japan. EIA investigations reveal that in a bid to obscure the eventual destination and confuse the trail, the ivory syndicate has used Singapore as a transshipment point on at least 15 occasions. It has also become apparent that the Singaporean companies and individuals implicated in the smuggling are a convenient front for the real power behind the consortium – a group of Hong Kong-based ivory traders.

According to the Bill of Lading for the

Freight and shipping records and documents dating back to the mid-1990s detail a total of 19 suspicious shipments dispatched from Allena-related companies to the Far East

Date of shipment	Sender	Recipient	Declared Contents
June 2002	<i>Seng Luck, Malawi</i>	<i>Delight Harvest, Singapore</i>	Stone sculptures
December 2001	<i>Allena Transport, Malawi</i>	<i>Delight Harvest, Singapore</i>	Stone sculptures
August 2001	<i>Allena Transport, Malawi</i>	<i>Delight Harvest, Singapore</i>	Stone sculptures
April 2001	<i>Allena Transport, Malawi</i>	<i>Delight Harvest, Singapore</i>	Stone sculptures
August 2000	<i>Allena Transport, Malawi</i>	<i>Delight Harvest, Singapore</i>	Not known
February 2000	<i>Allena Transport, Malawi</i>	<i>Kyomi Handcraft and Trading, Singapore</i>	Stone sculptures
May 1999	<i>Sheng Luck Industries, Malawi</i>	<i>Panyu Huada Wood Industry Ltd, Guangzhou, China</i>	Timber
August 1999	<i>Sheng Luck Industries, Malawi</i>	<i>Panyu Huada Wood Industry Ltd, Guangzhou, China</i>	Timber
February 1999	<i>Electro (PTY) Ltd</i>	<i>Guangdong Nanshan High New Tech Devpt Ltd Co, Nansha, China</i>	Timber
March 1998	<i>Sheng Luck Industries, Malawi</i>	<i>Kar Hin Timber, Singapore</i>	Timber
June 1997	<i>Sheng Luck, Malawi</i>	<i>Kar Hin Timber, Singapore</i>	Timber
June 1997	<i>Sheng Luck, Malawi</i>	<i>Guangzhou Jiahe Enterprises Group, China</i>	Timber
June 1996	<i>Sheng Luck Industries, Malawi</i>	<i>Kar Hin Timber Co, Singapore</i>	Timber
January 1996	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber
July 1995	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber
May 1995	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber
January 1995	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber
August 1994	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber
March 1994	<i>Sheng Luck Industries, Malawi</i>	<i>TOH Brothers Timber, Singapore</i>	Timber

Right: The Delight Harvest delivery address in Singapore for the June 2002 ivory shipment

intercepted container; the intended recipient was the company *Delight Harvest (Singapore) Pte. Ltd.* Unlike *Seng Luck*, *Delight Harvest* actually exists and was established in 1991 as an electronics manufacturer and general trading company. The registered address also exists although the firm has no telephone listing. Shipping information shows four previous consignments to *Delight Harvest* from *Allena Transport and Trading* in Lilongwe. Described as stone sculptures or wooden curios, they were dispatched in August 2000 and in April, August and December of 2001.

Geoffrey Kulupajili sent the Bill of Lading relating to the seized shipment by courier to an individual named Toh Yew Lye in Singapore. Toh admitted arranging the transshipment of several containers from Lilongwe to Japan on behalf of "Peter Wang", who he described as the owner of *Delight Harvest*. He claims he thought the consignment was sculptures, but Toh is also linked to *Toh Brothers Timber*, recipient of six shipments from Lilongwe.

Similarly, the directors of *Delight Harvest* deny all knowledge of the seized ivory, maintaining the company name was used without their knowledge. Yet one of the directors, Chan Chun Hung, was also a founding director of the Singapore firm *Kyomi Handicraft and Trading Pte. Ltd.* This firm was established in October 1988 by a group of Hong Kong ivory craftsmen, with the stated business intention of "ivory manufacturing and carving"¹⁰. In February 2000, *Kyomi* was listed as the consignee for a shipment



© Julian Newman/EIA

of sculptures from *Allena*.

Between March 1994 and May 1998 nine suspected ivory shipments are recorded going from Lilongwe to Singapore. In each case the consignor was *Sheng Luck* of Lilongwe, and the cargo was described as sawn timber, a common method for concealing ivory. Documents seen in Malawi reveal that *Sheng Luck* was another front used by *Allena*. Furthermore, shipping forms for some of the "timber" consignments were sent to fax numbers in Hong Kong and Japan which correspond to contact details used by the ivory buyer "Peter Onn" found at *Allena's* factory.

The year 1998 marked a major change in the modus operandi of the ivory smuggling syndicate. In the following year no shipments to Singapore can be traced to the syndicate, which dispatched three containers to southern China instead.

Right: Shipping bill for a consignment of 'stone sculptures' sent by *Allena* to *Delight Harvest* in August 2000.

Left: Document showing delivery of shipping bill from *Sheng Luck* to 'Peter Wang' in Hong Kong, July 1997.

1 From (Sender)	
Account no. #	Sender's name
	10136-1111
Sender's reference first twelve characters will be shown on invoice	
Company name	
SHENG LUCK	
Address	
P.O. BOX 20092 KAWALE LILONGWE MALAWI	
Postcode	Phone/Fax/Telex specify one
	7345117/8-5136
2 To (Receiver)	
Company name	
Delivery address	
DHL cannot deliver to a PO Box	
PETER WANG	
APT. 2B NO: 66-70	
GOLDEN CROWN BLD	
NATHAN RD HONG KONG	
Postcode	Country
	HONG KONG
Contact person	Phone/Fax/Telex specify one
	(852) 23675318
3 Sender's authorisation and signature	
I/we agree that DHL's standard terms apply to this shipment and limit DHL's liability. The Warsaw Convention may also apply (see reverse). We understand that DHL does not transport cash or documents.	

ALLENA TRANSPORT & TRADING P.O. BOX 20092, KAWALE LILONGWE 2, MALAWI.	
Consignee	not negotiable unless consigned to order
DELIGHT HARVEST (SINGAPORE) PTE LTD 11 SMITH STREET 0105 SINGAPORE 058925	
Notify Party	
DELIGHT HARVEST (SINGAPORE) PTE LTD 11 SMITH STREET 0105 SINGAPORE 058925	
Pre-carriage by	N/A
Ocean vessel	INDEPENDENCE
Port of loading	DURBAN
Voy. No.	128E

Far Left: George Poon, who made a fortune before the ban from poached ivory. Businessmen behind the ivory syndicate are linked to the Poon family.

Left: Shipping bill for consignment of timber from Sheng Luck to Singapore, faxed to 'Peter Wang' in Hong Kong.



© EIA

101-852-23688248

Shipper	Booking No.
SHENG LUCK INDUSTRIES P. O. BOX 1278 LILONGWE MALAWI.	GCO26
COMBIN	
RECEIVED otherwise not enumerated by Place of Delivery One of the in exchange herein. In accept agrees to all incorporated. Merchant. IN WITN below have b to be void. (Terms of	
Consignee (not negotiable unless consigned "to order")	
KAR HIN TIMBER CO (PTE) LTD, 31 SUNGEI KADUT STREET, SINGAPORE 2572.	
TEL: (65)3682266	FAX: (65)3681166
Notify Party	
KAR HIN TIMBER CO (PTE) LTD, 31 SUNGEI KADUT STREET, SINGAPORE 2572.	
TEL: (65)3682266	FAX: (65)3681166
Pre-prepare by	Place of receipt

Hong Kong Links

Historically Hong Kong has played a pivotal role in the international ivory trade but recent investigations by EIA indicate that whilst the domestic ivory industry is in steady decline¹¹, Hong Kong-based traders remain central to the ivory black market. It is clear that despite protestations of ignorance by its directors, *Delight Harvest* is linked to a group of Hong Kong ivory traders who expanded their sphere of operation to Singapore in the mid to late 1980s.

The mastermind behind the ivory syndicate exposed by the Singapore seizure is based in Hong Kong. His real identity remains a mystery, obscured by an array of fake names and addresses. However, documents gathered during the course of EIA's investigations reveal the names Peter Onn, Peter S. Wang, Y.S. Wong and Wang Yong Shi, all pseudonyms for the same person. What is certain is that this individual operates out of Hong Kong, as revealed by contact numbers and an address for the receipt of shipping bills, and has travelled to Lilongwe on at least six occasions to facilitate the shipment of ivory.

His involvement in Singapore is illustrative of a move by a group of Hong Kong ivory traders and craftsmen to expand into Singapore from the mid-1980s to take advantage of loopholes in the regulations governing the legal ivory trade. Others taking the same route included one of the directors of *Delight Harvest* and three of the founding directors of two other Singaporean companies, *Kyomi Handicrafts and Trading Pte. Ltd.* and *Fung Ivory Manufacturing Pte. Ltd.* All three companies have direct associations:

- They have the same company secretary and all have their registered address at the Fook Hai Building, 150 South Bridge Road, Singapore, the office of their auditor.
- *Delight Harvest* and *Kyomi Handicrafts* share a director.
- In February 2000 *Kyomi* was listed as the consignee for a container of stone sculptures and wooden curios sent from Lilongwe by *Allena Transport and Trading*.
- So Tat Wing, who signed the currency declaration form in Lilongwe for the seized shipment, is a *Kyomi* Director. He also signed the same form for the August 2001 shipment from *Allena* to *Delight Harvest*.
- So Tat Wing was once the managing director of *Fung Ivory*.

Several of these businessmen are associated with the Poon Family, which commanded an ivory empire stretching from Europe to Africa and the Middle East to the Far East during the 1980s. The most active members of the family were Poon Tat Wah and Poon Tat Wong, who oversaw ivory trading and carving operations in Hong Kong, the United Arab Emirates, Singapore, Macau, Taiwan and France³.

At the zenith of their ivory dealing in the late 1980s, Choi Tak Hing managed the Poon's ivory carving factory in Dubai and later the *Keimi Ivory Factory* in Hong Kong, also associated with the Poon brothers. Chan Chun Por fronted a Poon ivory company in Hong Kong. Both Choi and Chan established the *Fung Ivory Manufacturing Company* in Singapore in 1986, a business which still exists and is now run by brothers Poon Tat Wah and Poon Tat Hong. Choi and Chan are also directors of *Kyomi Handicrafts*. Singapore, it seems, is once again being utilised as an important staging post for poached ivory heading eastward from Africa to the ivory markets of East Asia.



© Hiroo Saso

Above: ASU Company, Yokohama, Japan: Destination address of numerous suspect shipments from Singapore.

Japan and China – Ivory Markets

The vast amount of poached ivory from Southern Africa flowing through the Lilongwe and Singapore channels since 1994 has ultimately been laundered into the ivory markets of China and Japan.

The shipment seized in Singapore was clearly destined for Japan. Some of the raw tusks were marked with “Yokohama”, a port city near Tokyo, Japan, and the huge number of over 40,000 hankos (traditional Japanese name seals) could only have been destined for the Japanese market. Investigations in Singapore also confirm the transshipment of ivory further east to Japan on numerous occasions.

Below: Ivory name seals for sale in Kitagawa Store, Tokyo



© Mary Rice/EIA

An airway bill for a shipment from *Allena Transport and Trading* to *Delight Harvest* in 2001 shows the Bill of Lading being despatched to the *ASU Company Ltd.* in Yokohama. *ASU* is a very small firm located in an area not far from the port among other small trading companies. Incorporated in 1991, it was registered as a wholesaler and importer of silk and other miscellaneous items in 1999. A company search in September 2002 revealed that it currently trades as a Personnel Dispatching Service and has three employees and six shareholders.

Although the latest batch of ivory did not reach its final destination in Yokohama, it is apparent that the syndicate has successfully moved tens of tonnes of illegal ivory into the Japanese market, supposedly the most strictly regulated in the world. That such a huge amount could move undetected onto the market raises serious concerns about Japan's enforcement capabilities and commitment to uphold *CITES* decisions. It also shows the disregard with which the Japanese ivory industry treats international regulations controlling the trade in ivory. Despite being allowed to legally buy 50 tonnes of ivory in 1999, the industry continues to trade in illegal ivory. Any further relaxation of the ivory trade ban will reward an industry that has flagrantly breached international and domestic law.

China has also received shipments from the syndicate on four occasions. In each case the recipient companies have been located in the southern province of Guangzhou, the centre of China's ivory business, and the shipments have been direct. While the last documented shipment was recorded in August 1999, China remains a prime destination for illegal ivory.

Although the smuggling syndicate has been disrupted by the seizure in Singapore and the efforts of a few enforcement officers in Zambia and Malawi, the leaders of the syndicate have not been traced. As long as the ivory markets of Japan and China are allowed to thrive on legal ivory there will always be smuggling operations to meet the demand for illegal ivory. Ultimately the under-funded enforcement authorities in elephant range states such as Zambia are left to count the cost in terms of corruption, conflict with poachers and diminishing elephant populations.

China's Emerging Ivory Market

Analysis of worldwide ivory seizures since the mid-1990s reveals the emergence of China as one of the main destinations for illegal ivory. China and Hong Kong have traditionally played a pivotal role in the ivory trade, but while China served as a carving centre and transit point in the past, economic growth is now leading to a burgeoning domestic market.

Detailed market investigations carried out by EIA in February 2000 and June 2002 found widespread availability of an array of ivory products, especially in the two historical centres of the ivory business – Guangzhou and Beijing.

At the time of the international ivory trade ban in 1989, carvers in Guangzhou were reportedly down to a few months supply of raw ivory¹², and a government audit of stockpiles registered just 110 tonnes of raw and worked ivory¹³.

The continued widespread availability of ivory products, and conversations with trade sources, clearly demonstrate that the market in China relies on smuggled ivory, which is easily laundered on to an unregulated market. One informed industry source claims that legitimate pre-convention and pre-ban stocks were exhausted by 1995, while a government official admits to a dramatic rise in illegal ivory entering China since 1998¹⁴. A journalist, curious at the availability of ivory in department stores in north China last year was informed by an ivory sales assistant in Harbin Province; 'Of course there is no ivory in China. These are all smuggled products'¹⁵.

This is confirmed by analysis of the *Elephant Trade Information System (ETIS)* seizure database kept by *CITES*, which blames growth in ivory seizure volumes since 1998 on increased demand in China. In 1999 half of all the ivory seized around the world was destined for China¹⁵.

The growth in China's ivory market since 1998, although primarily due to economic development, cannot be divorced from the 1997 *CITES* decision to allow a one-off sale of ivory. Although the sale was limited to Japan, sources in Zimbabwe indicate a high-level of interest from China in the auction process, with offers made by at least one Chinese firm to buy Zimbabwe's ivory stockpile¹⁶. Similarly, discussions by EIA with ivory traders in Guangzhou in early 2000 revealed considerable



© EIA

awareness of the ivory sale and a belief that it would presage a wider resumption of the legal ivory trade¹⁷.

Under Chinese law, elephant products are placed in Class 1 – equivalent to *CITES* Appendix I – prohibiting sale or purchase with the exception of ivory from pre-convention stockpiles. In reality EIA has documented a totally unregulated but buoyant ivory market in China. There is a clear dichotomy in enforcement. Although the Chinese authorities have made a series of commendable seizures of ivory at the point of import over the last few years, the retail sector is allowed to operate without checks or hindrance. There have been no meaningful, concerted market inspections since 1989, and it is impossible to cross-check finished products with supplies of raw materials.

There are, however, signs that the Chinese authorities are beginning to realise the scale of the problem and are taking appropriate measures. In 2001 the *State Forestry Administration*, responsible for implementing *CITES*, issued *Notification 2001/234*, urging greater attention to the smuggling, sale, purchase and transportation of illegal ivory. The notification also set standard values for ivory ensuring heavy penalties – up to five years in prison for a single tusk – for those convicted of dealing in illegal ivory.

EIA investigations also found a clampdown on ivory outlets in central Shanghai and an attempt to label ivory products in Beijing. Yet despite these efforts, ivory smuggling continues and the market thrives. As it is clear that the market is sustained by illegal ivory, it is imperative that the Chinese authorities launch a nationwide market audit and labelling system as an interim step towards an eventual domestic sales ban.

Above: Ivory for sale in Guangzhou Friendship Store, reported to be supplied by the Yueh Ya company.

'Of course there is no ivory in China. These are all smuggled products'

Sales assistant in Harbin Province, 2001

Illegal Ivory Heads for China

Although Chinese traders claim that their stocks are running out and material is difficult to find, seizures of ivory either entering or destined for China continue to rise. Although illegal activities are difficult to quantify, estimates for total ivory seizures from 1998 to 2001 vary from 30 to 45 tonnes¹³. Since the

Below: 58 tusks detected in London in July 2001 in transit from Kenya to Beijing.

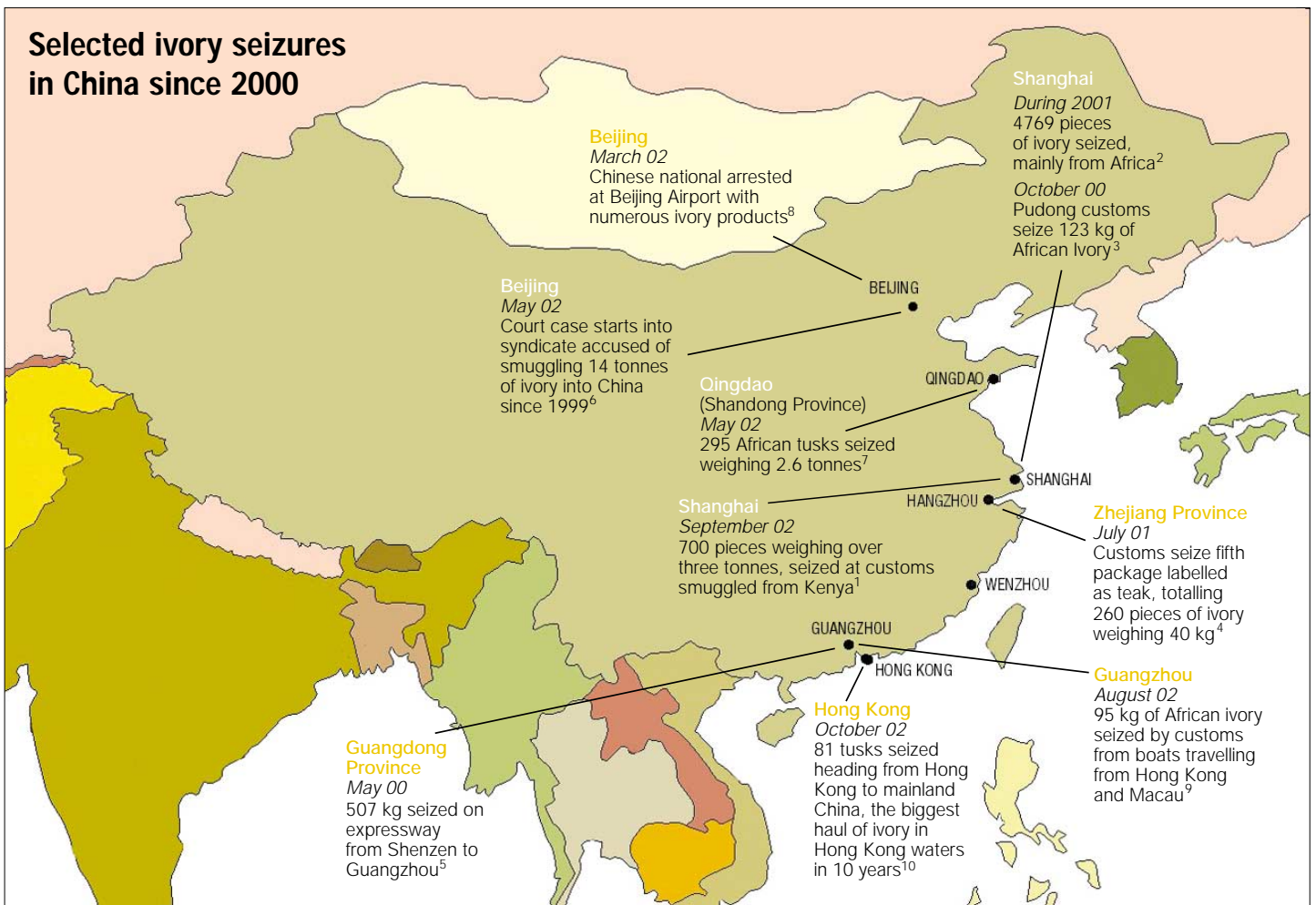


© HMCE

1997 decision to allow a legal trade with Japan, EIA has recorded seizures totalling 4.76 tonnes bound for China and seizures totalling 24.32 tonnes within its borders. These seizures represent a fraction of the total amount of illicit ivory entering the Chinese market undetected. Seizures include:

- August 2002: Shanghai Customs seized 700 pieces of ivory weighing three tonnes concealed in a container of timber shipped from Kenya¹⁸.
- April 2002: Chinese authorities uncovered the country's largest recorded ivory smuggling syndicate. Since 1999 the syndicate had smuggled 14 tonnes of ivory via Beijing's international airport. The 12 accused included a customs officer and a cargo manager employed at the airport¹⁹.
- August 2001: Belgian authorities arrested 15 Chinese doctors in Brussels for attempting to smuggle 150kg of ivory from Mali. One of the surgeons was carrying a letter stating black market prices for tusks²⁰.
- July 2001: 58 tusks weighing 445kg were detected at Gatwick airport in the UK, in transit from Kenya to Beijing²¹.

Selected ivory seizures in China since 2000



- May 2001: Customs in Qingdao intercepted 295 tusks concealed in a container of teak wood. A Hong Kong businessman was jailed for life for his part in the smuggling attempt²².
- October 1999: 150 tusks weighing 1.5 tonnes were seized near Lisbon, Portugal thought to be from southern Africa and destined for China²³.
- August 1999: Kenyan customs seized 188 elephant tusks weighing 700kg from a North Korean Embassy diplomat in transit from Cameroon to China²⁴.
- April 1999: Russian customs seized 537kg of raw ivory in Moscow in transit from Lagos to Beijing²⁵.
- October 1998: A North Korean diplomat travelling from Cameroon to China was detained at a Paris airport with 600kg of raw ivory²⁶.



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Market Investigations

In June 2002 EIA conducted a detailed appraisal of ivory markets in Hong Kong, Shanghai, Tianjin, Beijing, Guangzhou and Zhejiang provinces. This retail analysis followed an earlier market survey carried out in February 2000¹¹.

Results show that while Hong Kong continues to decline in importance as an ivory trade centre, and the local government in Shanghai has launched a partial clampdown, both Beijing and Guangzhou retain buoyant ivory markets.

In these two thriving cities EIA observed a wide range of products on sale. In addition to display cases of large sculptures and ornaments, many shops had quantities of more affordable consumer items such as jewellery and other trinkets, such as products linked to the Chinese horoscope. Chinese nationals represent the main market but Japanese, Taiwanese and European tourists also buy smaller pieces and smuggle them home.

Many of the outlets EIA visited stated that their items were made from pre-ban stockpiles, although the volume of products on sale – similar to levels EIA witnessed in 2000 – cast serious doubt on such aspersions. In several locations, especially markets, vendors admitted that their products were produced from newly imported ivory.



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Guangzhou – flourishing ivory trade

Guangzhou city and areas in the surrounding province of Guangdong remain at the centre of China's illicit ivory trade. Outlets in Guangzhou had the most ivory products on sale, and carving operations in the province distribute their wares around the country.

EIA recorded hundreds of ivory products on sale in the *Guangzhou Friendship Store*, ranging from RMB200,000 (\$24,000) for intricately carved tusks to RMB300 (\$35) for a small pendant. The exclusive *White Swan Hotel* and *New World Hotel* in Shun Tak also had large and varied ivory displays.

Conversations with staff in the three ivory outlets revealed that they are all supplied by the

Above top: Guangzhou's Jade Market area.

Above: No 25 Dai Ho Road, Jade Market: The registered address of a company charged with buying ivory from a syndicate which smuggled 14 tonnes of ivory into China between 1999 and 2001.



Above: Yueh Ya shop based in Guangzhou's Jade Market area. Yueh Ya is one of the most significant distributors of ivory products in China.

Guangzhou-based company *Yueh Ya*. This firm appears to be the most significant distributor of ivory products in China. Products from *Yueh Ya* have been recorded in Shanghai, the northern Chinese port city of Dalian and the far northern city of Harbin.

Yueh Ya is run by two brothers. Their father formerly worked as a carver at the state-owned *Daxin Ivory Carving Factory* but left to establish his own company. Whilst state-run carving operators such as *Daxin* continue to decline, smaller private firms such as *Yueh Ya* have prospered. *Yueh Ya* was set up in 1990 and was therefore not included in the 110 ivory businesses registered by the government in 1989. It is understood that only ivory businesses

registered at that time are legally allowed to operate in China¹³

In addition to supplying department stores and hotels, *Yueh Ya* also owns two dedicated ivory shops in Guangzhou. Its promotional literature features pictures of extinct mammoths and details of mammoth ivory carving, but when EIA visited the two shops a large number of elephant ivory items were in evidence, with very few mammoth ivory pieces.

One of *Yueh Ya's* ivory shops is located in the *Jade Market* area of central Guangzhou, a maze of alleyways with stalls selling jade items and ivory products from small carving operations around Guangdong. Just yards away from *Yueh Ya's* location is the registered address of the *Guangyazhai Arts and Crafts Business Section*. This firm received part of the 14 tonnes of illegal ivory smuggled through Beijing International Airport between 1999 and 2001, and has been charged in connection with the case. It is clear that the *Jade Market* area serves as an important distribution centre for smuggled ivory.

An insight into *Yueh Ya's* business methods was provided during a conversation with a representative of the *Daxin Ivory Carving Factory*. When told that *Yueh Ya's* outlet in the *New World Hotel* in Shun Tak had a sign claiming its products came from *Daxin*, the representative stated that *Yueh Ya* had bought a small number of products from them in 2000 to capitalise on *Daxin's* respectable reputation, and as a cover for the real origin of their ivory products.

Right: Paintbrushes advertised over the internet, including ivory items.

The Ivory Paintbrush Trade

While many of the outlets visited by EIA stock large, high value items such as intricately carved 'Guangzhou' spheres, carved whole tusks and statues, it is demand for high volume, lower value products that is driving China's domestic market. Economic growth and the attendant rise in spending power are driving demand for jewellery, seals and chopsticks made of ivory.

EIA also discovered a new consumer market for ivory – special paintbrushes made from the hair of babies or the hair of newly-weds sold as mementoes. EIA visited two of these brush manufacturers - a Shanghai dealer who told us that they use small amounts of pre-cut new ivory imported from Africa, and the largest dealership in paintbrushes in Tianjin, Northern China, which makes approximately 10,000 ivory brushes a year.





Left: Illicit ivory goods offered for sale by traders from Panjiayuan Market, Beijing.

Below: Beijing's Panjiayuan Antique Market – an outlet for smuggled ivory

Beijing – ivory trade goes underground

On one front, ivory trade in Beijing appears to be diminishing. *The Beijing Ivory Carving Factory* claims to now only carve bones, and most of the larger outlets such as the *Beijing Arts and Crafts World Store* and the *Beijing Friendship Store* employ a labelling system stating that the product is for sale within China only. Yet both locations were still well-stocked compared with EIA's survey in 2000, and sales staff stated that 90 per cent of the products come from Guangzhou, casting doubt on how rigorously the labelling system is applied.

Although the government has introduced this scheme to discourage illegal activities, EIA found a thriving underground trade in illicit ivory operating in the huge *Panjiayuan Market* – notorious as an outlet for smuggled goods. During a survey of the market EIA noted a few small items on display, but when interest was shown in the products, the stallholders produced larger items from suitcases. During a subsequent meeting at a Beijing hotel, a stallholder from the *China Arts and Crafts Corporation* (an ivory carving factory in Zhenping, Henan province) stressed that their material was new and came from Burma, India and Southern Africa. The firm spoke of smuggling products out through diplomatic channels, and explained how ivory could be mixed with bone for export.



Right: Ivory products for sale in Kitagawa Store, Tokyo

Far right: Part of over two tonnes of ivory seized in Taiwan in May 2000

Below right: Thai carver making bracelets for a thriving ivory market

Asian Ivory Markets



© Mary Rice/EIA



© EIA

Japan

During the last *CITES* meeting in April 2000, Japanese customs at the seaport of Kobe seized 500kg of ivory from Singapore, hidden under a consignment of wooden chopsticks. Two individuals were arrested in connection with the case - Mr Yau, a Hong Kong resident with a British passport and Mr Ishida, a Japanese national who was previously a board member of one of the major Japanese ivory associations. Ishida has subsequently been released with a paltry fine of \$2,700 for carrying 'unpermitted commodity'²⁷ within Japan. Japanese customs reported 112 cases involving seizures of ivory products between January 1996 and December 2001, including a seizure of 13,800 hanko materials coming from Singapore.²⁸

Thailand

Thailand now represents the largest domestic market for ivory items in South-east Asia²⁹. Recent seizures and the fact that the local elephant population remains relatively steady²⁹ despite a wide availability of ivory products, indicates that large quantities of ivory are being smuggled into the country. A recent press report states that seizures of African ivory by Thai officials have increased a hundredfold since 2001³⁰.

Documented seizures include 490kg of ivory seized at Bangkok from Zambia in April 2000³¹, 580kg seized by Tanzanian customs heading for Bangkok in September 2001³², 213kg of ivory intercepted at Uganda's Entebbe Airport bound for Thailand in July 2001³³, and 389kg of ivory from Uganda and Oman seized in Thailand in May 2002³⁴.

Enforcement of *CITES* legislation in Thailand is weak and there are few prosecutions for buying or selling ivory. In addition, a loophole in Thai legislation allows the sale of ivory from domesticated elephants making it impossible to distinguish smuggled ivory from domesticated elephant ivory.

Taiwan, Republic of China

In May 2000, Taiwanese customs seized 2.16 tonnes of ivory, including 332 uncarved tusks in a shipment from Cameroon. The consignment had been labelled as timber, a common smuggling method because of the time and effort involved in removing wood to check the contents of a container. It is thought that the shipment had travelled to Taiwan via Spain, Singapore and Malaysia with a final destination of the *Leeing International Company*.

When EIA visited the *Leeing* address, they found it to be the site of a ladies' hairdressers. However, EIA was told by a neighbouring store that the previous occupant, a Macao resident, had been in trouble with the law over selling ivory items in his craft and furniture shop the year before, and had disappeared after police visited the shop.

Analysis of the *ETIS* seizure database maintained by *CITES* shows that six of the thirty largest recorded ivory seizures since 1989 occurred in Taiwan. It is thought that Taiwan serves mainly as an entrepot for ivory destined to be transhipped to other countries in East Asia¹⁵.



© Simon Oxby, Danish Broadcasting Corporation

The Impact on Elephant Populations

The effects of a resurgent ivory demand are being felt in many range states throughout Africa and Asia, where elephant populations are coming under increasing poaching pressure. The situation is exacerbated by poverty, conflict, the availability of weapons, corruption and a chronic lack of enforcement resources.

• Kenya

The *Kenyan Wildlife Service (KWS)* is extremely concerned over an upsurge in poaching within its borders during the last year, and contends that poachers are increasing their operations in anticipation of an overturn of the ban. Partly in response to this, *KWS* have recently equipped their rangers with new automatic firearms to combat poachers.

In October 2002, *KWS* recorded 81 elephants killed illegally compared with only 57 in the whole of the previous year³⁵.

In March this year, a family of ten elephants was killed in *Tsavo East National Park* – the single largest poaching incident in Kenya since the ivory ban was agreed in 1989. Five of the well-organised gang of poachers were killed³⁶ and 18 tusks were found buried near the site³⁷. In the early part of 2002, five elephants were poached in the Samburu district³⁸ and four more in July in Ijara District's Boni Forest³⁹ and in Laikipia, Mount Kenya region⁴⁰.

One of the main routes for poached ivory out of Kenya is northwards by land via Somalia and Sudan, where ivory prices have reached a 13-year high³⁶. Ivory also leaves via Nairobi Airport, as in the case of 58 tusks intercepted en route to Beijing in July 2001²¹, and by sea, as highlighted by the seizure in Shanghai in August 2002 of three tonnes of ivory from Kenya¹⁸.

• Tanzania

Whilst official sources in Tanzania deny there is an elephant poaching problem, eye witnesses have described heavy poaching in Game Reserves – in particular the *Selous*, *Kisigo* and *Rungwa Game Reserves*.

There has been a series of ivory seizures in Tanzania over the last couple of years, with the capital Dar Es Salaam emerging as a regional centre for the collection and despatch of ivory. These seizures include 158 pieces in April 2001⁴¹, 580kg seized at the airport before it was loaded onto a plane heading for Bangkok³²,



Left: Kenya's largest poaching incident since the ivory ban: ten elephants killed in Tsavo National Park in March 2002.

© Kenyan Wildlife Service



© Kenyan Wildlife Service



© Kenyan Wildlife Service

and the country's largest single ivory smuggling incident - 1255 pieces of ivory, weighing three tonnes, seized from two houses in a residential neighbourhood of the capital⁴².

• West and Central Africa

Areas in West and Central Africa are reported to be suffering from severe elephant poaching. Field reports suggest significant cross-border trade of ivory and elephant meat between Democratic Republic of Congo (DRC) and Central African Republic (CAR). One report states that all elephants in the eastern part of

The Impact on Elephant Populations



© John Costello

Above: Poached Elephant in Zimbabwe, November 2001

CAR have now been poached⁴³.

A United Nations report in 2001 states that civil war in DRC has killed off thousands of elephants and that soldiers have slaughtered elephants for their meat as well as their tusks. The report states that two tonnes of elephant tusks were found in the Bukavu area of the country in late 2000⁴⁴. The recently published *Summary Report on ETIS (Elephant Trade Information System)* also notes that

circumstantial evidence indicates that 'conflict in DRC, including the engagement of surrounding countries, stands behind the increasing supply of ivory for international consumption'¹⁵.

An EIA field investigation in August 2000 exposed how Cameroon acts as a conduit for poached ivory moving from West and Central Africa. Many shops and markets in the capital, Yaounde, sell ivory and one dealer admitted to shipping ivory from Cameroon to the US and France. Another key ivory trader in the port of Douala told EIA that the demand from China, and Asia in general, was so large that it could not be satisfied. At the time of EIA's visit, he said he had an order of 10,000 ivory bracelets for Japan.

In the far south-eastern region of Cameroon near the borders with Congo and CAR, EIA met with Baka Pygmy hunters who explained that elephant poaching is normally commissioned by logging company employees, government officials and urban elite. The hunters are provided with arms and allowed to keep the meat in return for the tusks which are then smuggled out of Cameroon hidden in logging trucks as they travel across the borders of neighbouring countries⁴⁵.

• Zimbabwe

The current socio-economic climate in Zimbabwe and a chaotic program of land reform has led to an almost total breakdown in conservation

Right: Ivory for sale in Cameroon, August 2000



© EIA



Above: Poached elephant in Selous Game Reserve, Tanzania, May 2002.

© EIA

throughout the country. Poaching of all species is now completely out of control and it is estimated that more than 60 per cent of the total wildlife population has been slaughtered⁴⁶.

Despite promises to the contrary, 90 per cent of private game farms, wildlife sanctuaries and conservancies in Zimbabwe have been invaded or resettled even though the land is incapable of sustaining agricultural systems or domestic livestock. War veterans, who do not distinguish between common and endangered animals, are indiscriminately annihilating wildlife. Huge tracts of forest are being cut down and burnt and some areas are now totally devoid of wildlife⁴⁶.

The wanton poaching and snaring of animals continues on a daily basis and the *Department of National Parks and Wildlife Management (NPWM)* no longer has the capacity to effectively patrol areas because of the shortage of resources and the wave of invasions. In June 2001, a Zimbabwe newspaper reported that 83 elephants had been poached countrywide in a year⁴⁷.

• Asia

Asian elephants are also under threat from the demand for ivory. Today there are estimated to be fewer than 50,000 Asian elephants left in the wild, a tenth of the African elephant population²⁹, and suffering the same poaching pressures. A report published in 2002, by

Esmond Bradley Martin and Dan Stiles illustrates how the ivory trade has been a major factor in the continuing sharp decline of Asian elephant populations in South and South East Asia. The report details that since 1990 wild elephant populations have decreased by more than 90 per cent in Vietnam, by almost 90 per cent in Cambodia and by over 50 per cent in Laos²⁹.

The elephant is one of India's most endangered species, and only 1,500 of the remaining population of around 25,000 are male tuskers⁴⁸. Understaffed and underpaid wildlife wardens are struggling to control poaching. Since December 2001, seven elephants have been poached in the Corbett-Sonanadi-Rajaji belt, an important region for tuskers⁴⁹. In the whole of 2001, nearly 90 elephants were reported killed in India, up from 51 the year before. It is also reported that over 7.1 tonnes of ivory were seized in 2001, compared with 730kg the year before⁵⁰. In May this year, an ivory trader was arrested with a huge cache of ivory carvings in Trivandrum, in the state of Kerala - known to be a trade centre for illegal ivory. The ivory was thought to be from southern Indian elephants⁵¹.

Poaching of all species is now completely out of control [in Zimbabwe] and it is estimated that more than 60 per cent of the total wildlife population has been slaughtered

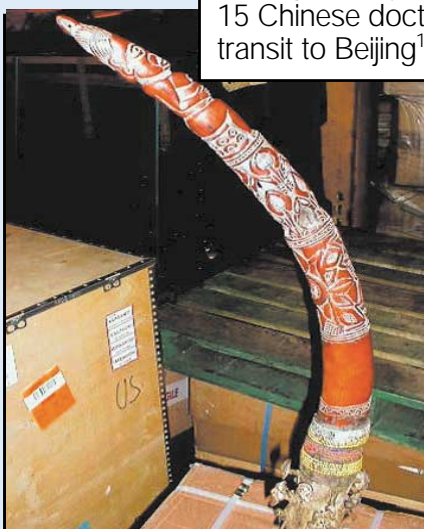
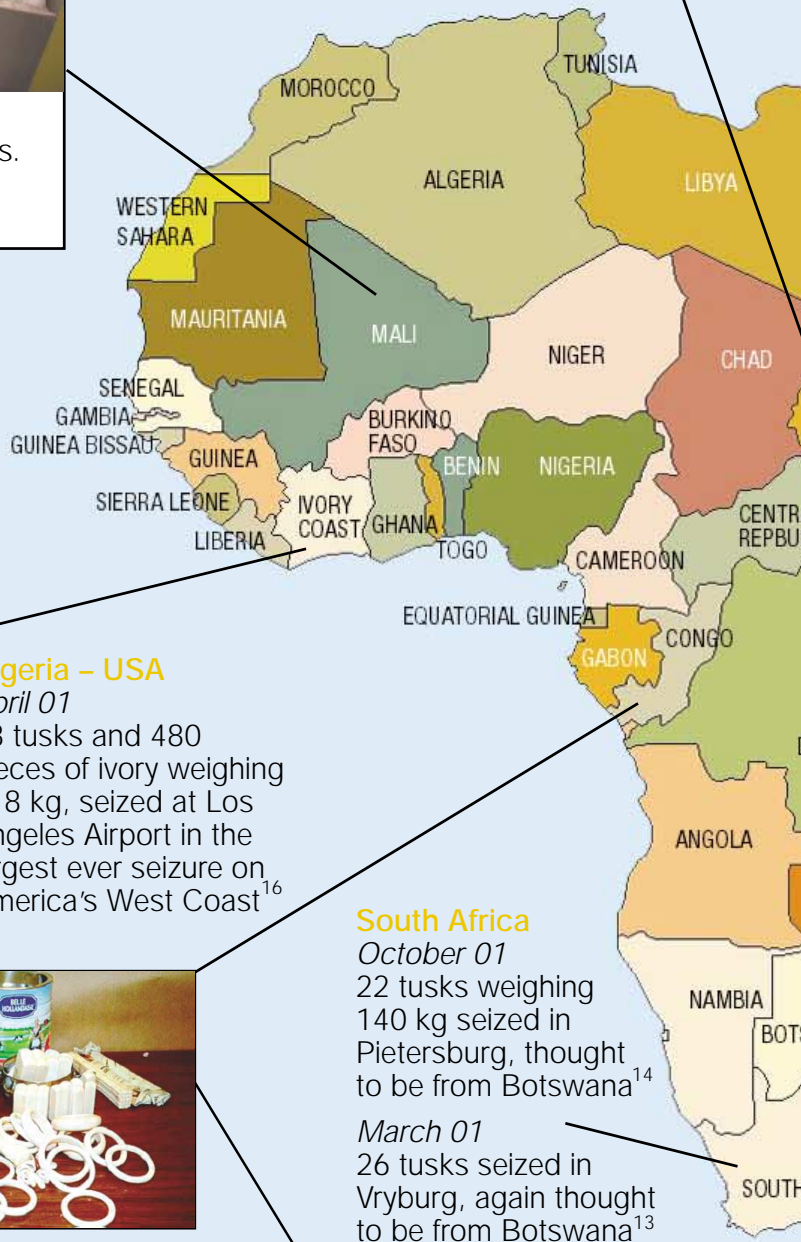
Illegal Ivory on the Move

© EIA



Mali – China August 01
150 kg of ivory seized at Brussels. 15 Chinese doctors arrested in transit to Beijing¹⁹

Rwanda – Macau
May 01
91.95 kg of ivory seized at Macau from Rwanda via Thailand⁶



Ivory Coast – USA Sept 00
One of 57 carvings seized at JFK airport from the Ivory Coast, destined for New York's African Art Dealers¹⁸

Nigeria – USA
April 01
38 tusks and 480 pieces of ivory weighing 118 kg, seized at Los Angeles Airport in the largest ever seizure on America's West Coast¹⁶

South Africa
October 01
22 tusks weighing 140 kg seized in Pietersburg, thought to be from Botswana¹⁴
March 01
26 tusks seized in Vryburg, again thought to be from Botswana¹³

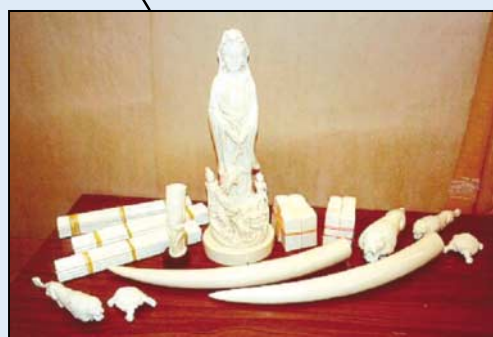
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Democratic Republic of Congo – Beijing
May 02
Over 800 items seized heading for China's Ministry of Defence¹⁵



Cameroon – Taiwan May 00
2.16 tonnes of ivory seized in Taiwan in a shipment from Cameroon¹⁷

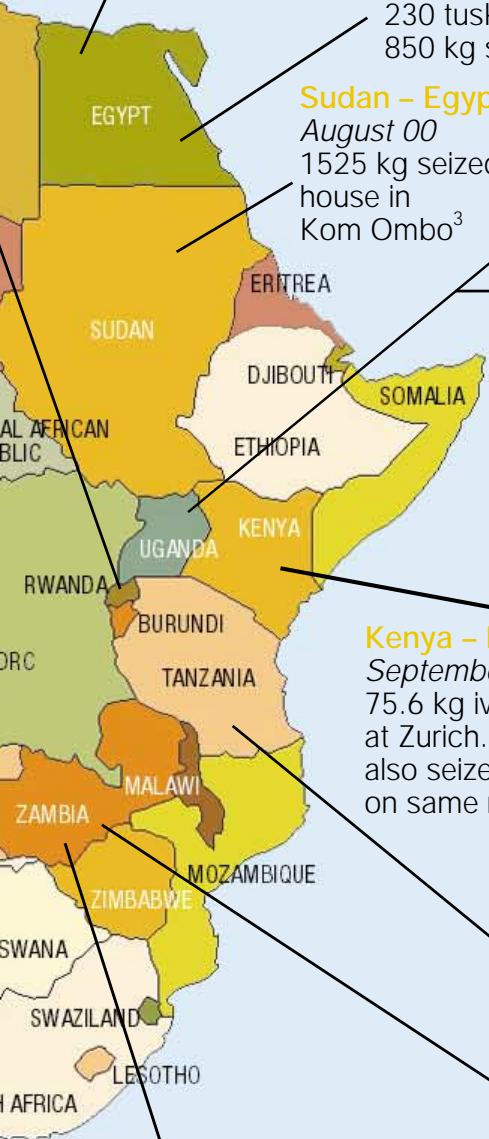


Democratic Republic of Congo – Beijing June 02
9.5 kg ivory products seized in Brussels¹⁵

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Cairo – Egypt

May 02
Total of 174.15 kg in four seizures at bazaar following 4 kg seizure at airport from Milan-bound passenger¹

Aswan, Egypt

November 01
230 tusks, weighing 850 kg seized at bazaar²

Sudan – Egypt

August 00
1525 kg seized in house in Kom Ombo³

Uganda – Thailand

May 02
194 kg ivory seized⁴

Kenya – Beijing

September 01
75.6 kg ivory seized at Zurich. Carvings also seized in March on same route⁷



Kenya – Shanghai

August 02
Over three tonnes of ivory seized in Shanghai in a shipment from Kenya²⁰



Uganda – Thailand

June 02
213 kg ivory seized bound for Thailand⁵



Kenya – China

July 01
58 tusks seized in London in transit from Kenya to Beijing²²

Kenya – Thailand

November 01
203 kg of ivory seized at Bangkok Airport⁸

Tanzania – Thailand

September 01
580 kg of raw ivory siezed at Dar Es Salaam airport destined for Moroccan Embassy, Bangkok⁹

Dar es Salaam, Tanzania

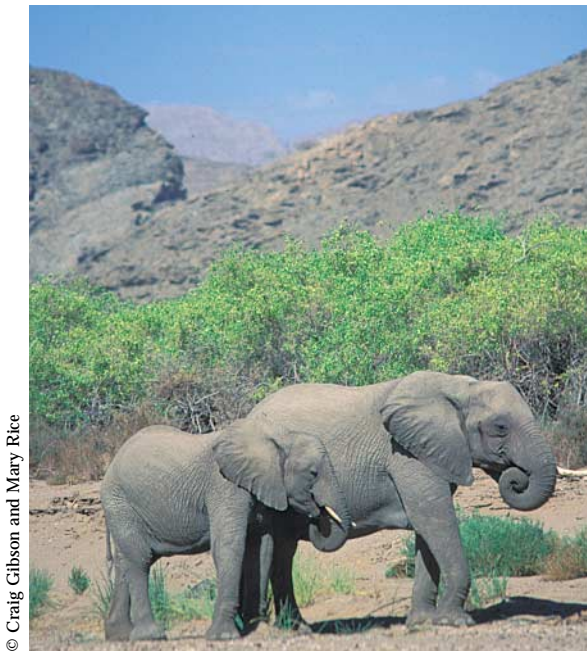
January 02
1255 pieces of tusks seized in 2 houses weighing over 3 tonnes¹⁰
February 02
158 pieces and 5 tusks seized in 2 incidents¹¹



Zambia – Thailand April 00
490 kg of ivory concealed under gemstones at Bangkok Airport in a consignment from Zambia¹²



Zambia – Singapore
Six tonnes of ivory seized in Singapore in transit to Japan. Origin: Zambia via South Africa²¹



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Conclusions

- Continued demand for ivory in the main markets of Japan, China and Thailand, coupled with inadequate market controls, is fuelling ivory poaching in many African range states.
- The seizure of over six tonnes of ivory in Singapore in June 2002, the largest seizure since the international trade ban was agreed in 1989, has exposed the existence of a highly organised smuggling syndicate spanning Southern Africa and East Asia. Investigations by EIA reveal that the syndicate has successfully smuggled tens of tonnes of ivory from poached elephants since the mid-1990s and that this illicit ivory has been absorbed into the ivory markets of Japan and China.
- Japan's much-vaunted internal control system has failed to detect significant amounts of illegal ivory entering the market.
- Analysis of seizures shows that China is one of the main destinations for illegal poached ivory and despite commendable efforts in seizing ivory at the point of entry, the retail market is unregulated and the laundering of black market ivory is commonplace.
- In April 2002 Chinese authorities broke the country's largest recorded ivory smuggling ring. Those involved imported 14 tonnes of illegal ivory between 1999 and 2001. EIA market investigations in China reveal a buoyant ivory retail sector, despite the fact that legitimate supplies were exhausted by the mid-1990s.

- Unfettered ivory markets are impacting elephant populations in many range states. Poaching is rising in a number of countries, aided by ineffectual enforcement and corruption.
- In Zambia's *Kafue National Park*, more than half of its 1996 population of 4,500 (+/- 5000)⁵ elephants had been lost by 2000⁹. In February the Tanzanian police seized 1,255 pieces of ivory in the capital of Dar es Salaam, the country's largest ever haul of poached ivory. In March a family of ten elephants was poached in Kenya's Tsavo East National Park, the worst single poaching incident in the country since the international ivory trade ban was agreed in 1989
- To allow further legal sales of ivory, as requested by five Southern African range states, would place intolerable pressure on threatened elephant populations and reward an industry which continues to thrive on illegal supplies.

Recommendations

Parties to CITES:

- Oppose proposals from Botswana, Namibia, South Africa, Zambia and Zimbabwe for legal ivory sales.
- Support the Kenyan and Indian proposal to place all African elephant populations on Appendix I.

Government of Japan:

- Conduct a comprehensive inquiry into the fate of all illegal ivory smuggled into the country from Lilongwe via Singapore since the mid-1990s.
- Set a date for the introduction of a domestic ban on the sale of ivory.

Government of China:

- Conduct a nationwide inventory of ivory stockpiles and introduce a comprehensive registration system.
- Set a date for the introduction of a domestic ban on the sale of ivory.

Government of Thailand:

- Remove the law allowing the sale of ivory from domesticated elephants which currently acts as a convenient mask for illegal trade.
- Set a date for the introduction of a domestic ban on the sale of ivory.

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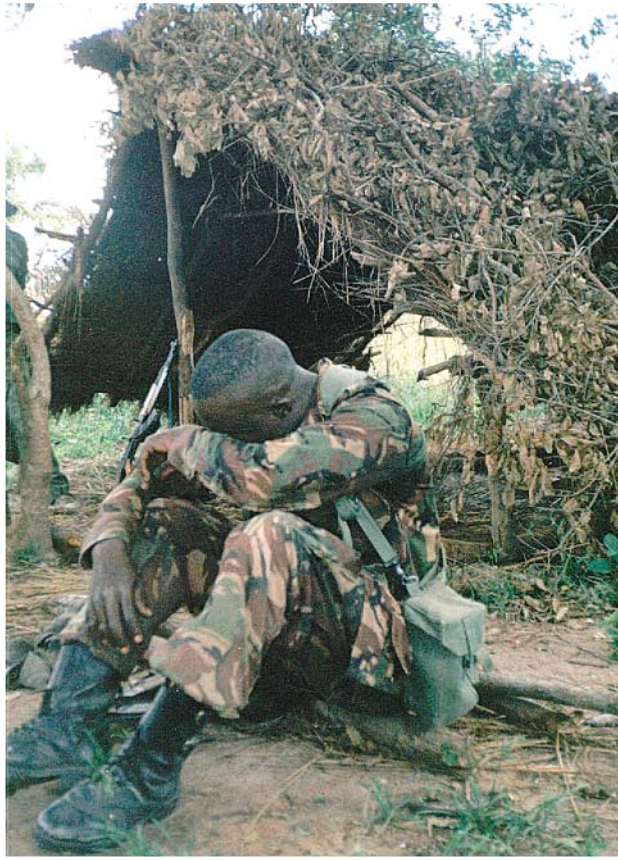
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