



**The Canadian
Chamber of Commerce
in Hong Kong**

La Chambre de Commerce Canadienne à Hong Kong
香港加拿大商會

15 March 2017

Miss Tanya Chan
Chairperson of Panel on Environmental Affairs
Legislative Council
Room 814, Legislative Council Complex,
1 Legislative Council Road,
Central, Hong Kong

Dear Miss Chan,

I enclose the Canadian Chamber of Commerce in Hong Kong's request for support to Hong Kong Government's Ivory Ban.

Thank you.

Yours sincerely,

Derrick Lee
President, Canadian Chamber of Commerce

Cc Mr. Lawrence Nutting, Chairman of the Canadian Chamber of Commerce in Hong Kong
Mr. Joseph Law, Chair of the Sustainable Development Committee

Re: Request to Support the Hong Kong Government's Ivory Trade Ban

The Canadian Chamber of Commerce is writing to you as a member of Hong Kong's Legislative Council, to the Chamber's support for the Hong Kong Government's proposed legislation to ban the Hong Kong ivory trade and increase maximum penalties for wildlife crime.

Over the past quarter-century, Hong Kong has witnessed the trading of a range of wildlife products including elephant ivory. As you may know, the trade in African Elephant Ivory was banned in 1989 as part of the Convention of Trade in Endangered Species. Ivory that is 'pre-convention' however can be traded in Hong Kong legally, provided that it is licensed by The Agriculture Fisheries and Conservation Department i.e. it is proven to be pre convention, and thus before the international ban

However, since legal and illegal ivory is distinguished essentially by its age and origin it appears that without scientific analysis (such as through radioisotope analysis or determination of origin via genetic analysis) it will be difficult to identify a new piece of ivory (that cannot be traded) from an old one (that can be licensed), meaning that illegal ivory can potentially be laundered as





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a legal product. There are different sources that point to the possibility of some Hong Kong ivory vendors laundering ivory from illegally killed elephants into the domestic “legal” market. Therefore, the proposed legislation, which first wants to ban ivory that was acquired before 1975 and then ivory that was acquired before 1990, should ensure there are robust processes to ensure strict enforcement.

There are also views that a 5-year period is not sufficiently long for ivory traders to sell off their remaining stock. We disagree and would point out that ivory traders have had effectively 28 years to sell their pre-convention ivory stocks, yet research indicates that Hong Kong’s licensed ivory stocks reported to AFCD are not diminishing as would be expected given the demand and sales for these products. According to certain media reports, traders have admitted that illegal ivory (freshly poached) is used to top up local ivory Stocks.^{1 2}. The proposed legislation should set a clear deadline and a means to enforce the deadline with meaningful penalties.

The Hong Kong government’s move to ban the trade has responded to this ongoing issue and the crisis now facing Africa’s wild elephant populations, which is in part facilitated by this situation in Hong Kong. According to a paper from the Proceedings of the National Academy of Sciences of the United States³, 33,000 African elephants are killed each year, primarily to satisfy the demand for ivory in Hong Kong and mainland China. That equates to one every fifteen minutes. Some scientists have even suggested that the true number could be even higher. It is estimated that at current poaching rates – the African Elephant will be extinct in the wild in our lifetime.

In January 2016, Chief Executive Leung Chun-ying pledged to ban the Hong Kong ivory trade⁴ meanwhile the Chinese government has pledged to close down its own domestic ivory market by the end of this year. By choosing to support the government’s proposal to ban the trade, Hong Kong lawmakers can take a stand against poachers and the organized crime syndicates behind them and support the African economies that are fighting against the poaching of a valued resource. Opinion surveys have shown that the Hong Kong public is resoundingly opposed Hong Kong’s “legal” ivory trade.⁵

We therefore recommend our lawmakers to take a positive stand, not only to vote for the Hong Kong government's efforts to ban our own city's ivory trade, but to encourage them to phase it out as soon as possible.

1 WildAid, 2015 The Illusion of Control.

2 <http://edition.cnn.com/2015/10/21/asia/hong-kong-illegal-ivory-trade/>

3 <http://www.pnas.org/content/111/36/13117.full>

4 <http://www.policyaddress.gov.hk/2016/eng/p204.html>

5 http://www.wildaid.org/sites/default/files/resources/WildAid%20Ivory%20Consumption%20report_POP.pdf

