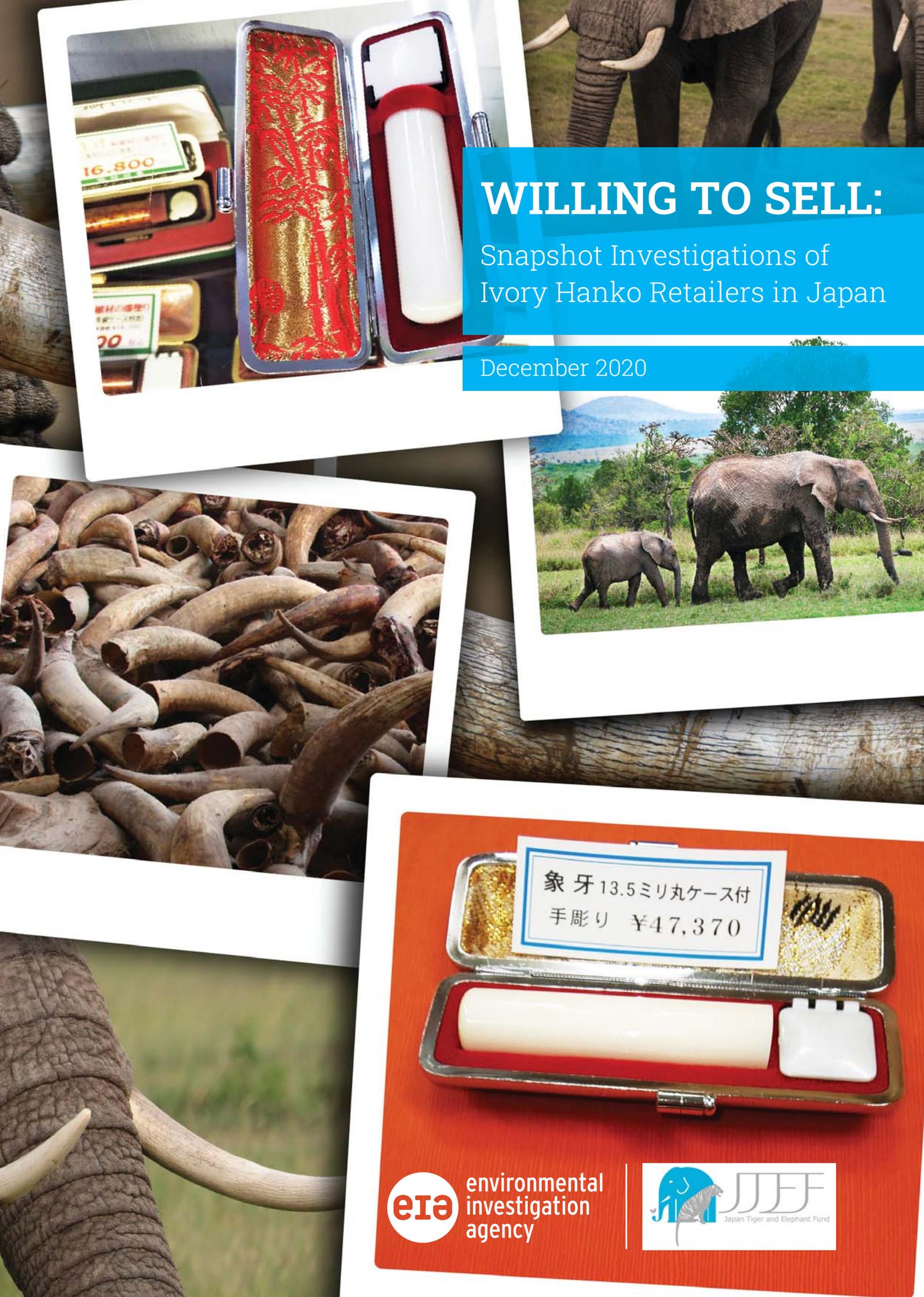


# WILLING TO SELL:

Snapshot Investigations of  
Ivory Hanko Retailers in Japan

December 2020





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## ABOUT EIA

The Environmental Investigation Agency US (EIA) is an international non-government organization committed to combating environmental crime. For over 30 years as a nonprofit organization, EIA has pioneered the use of undercover investigations to expose environmental crime around the world. Intelligence reports, documentary evidence, campaigning expertise and an international advocacy network enable EIA to achieve far-reaching environmental protection by spurring changes in market demand, government policy, and enforcement related to global trade in wildlife and environmental products. Learn more about EIA's Japan-focused elephant ivory campaign at [www.eia-global.org/subinitiatives/japan](http://www.eia-global.org/subinitiatives/japan)

## ABOUT JTEF

The Japan Tiger and Elephant Fund (JTEF), a non-profit and non-government organization, contributes to protecting the world of wildlife by representing their voice and interests, so that global biodiversity and the natural environment of human beings will be conserved. JTEF has committed to combating wildlife crime related to Japan and eradicating unsustainable wildlife trade by researching wildlife markets, analyzing the legal systems, keeping contact with the law enforcement communities, and working together with international/domestic organizations sharing the same goals. Learn more at [www.jtef.jp](http://www.jtef.jp)

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## EXECUTIVE SUMMARY

**Japan is home to the world's largest legal domestic ivory market, and its weak ivory trade controls enable consistent trafficking in ivory, including illegal exports.**

Because 80 percent of Japan's ivory consumption is for *hanko* (signature seals), it is important to understand the role that *hanko* retailers play in the ivory trade. EIA and JTEF completed two snapshot investigations in 2020 as a follow-up to a similar 2018 investigation to determine retailers' willingness to sell an ivory *hanko* knowing the customer planned to export it, which is illegal.

In one investigation of 100 retailers in three large urban areas, 38 percent of the retailers who responded to the investigator (29/76) agreed to sell an ivory *hanko* knowing it would be exported. In 2018, these same retailers had declined to sell. Of the 41 ivory *hanko* retailers investigated in Tokyo, 39 percent (16/41) agreed to sell ivory with the understanding that it would be exported.

In another investigation targeting 150 *hanko* retailers across Japan, 91 percent of the retailers (81/89) who responded to the investigator said they were willing to sell an ivory *hanko* with the understanding that it would be exported. Most retailers were aware that taking an ivory *hanko* outside of Japan is illegal and, in some cases, retailers gave guidance to the investigator on how to circumvent the authorities to successfully export ivory. Results reveal that most sellers are aware that ivory exports are illegal and remain willing to engage in a sale knowing the ivory product would be exported, indicating that the Government of Japan's awareness-raising efforts have failed. The only way the Government of Japan can fix its significant ivory trade problems is by closing its domestic ivory market and effectively enforcing its laws and regulations.



## BACKGROUND: JAPAN'S DOMESTIC IVORY MARKET

Since 1970, more than 262,000 African elephants (*Loxodonta*) have been killed to supply the Japanese ivory market.<sup>1</sup> Ivory was popularized as a luxury item for *hanko* name seals by the ivory industry in the 1970s, leading to a dramatic increase in demand for ivory and fueling elephant poaching across Africa.<sup>2</sup> In 1989, the global community agreed to ban the international ivory trade under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in response to the poaching crisis. Japan is the only country to have twice been allowed to import ivory from southern African nations after the CITES international ban, in 1999 and again in 2008.

In 2016, responding to the resurgence in poaching of African elephants,<sup>3</sup> CITES Parties agreed by consensus that domestic ivory markets that contribute to poaching or illegal trade should be closed as a matter of urgency, pursuant to the revised CITES Resolution Conf. 10.10, Trade in elephant specimens. Despite the CITES decision, the Government of Japan has continued to protect its domestic ivory market, believing it does not violate the decision language, and maintains the largest active legal ivory trade of any nation today.

Japan's legalized stockpile of whole tusks and cut pieces totals nearly 260 metric tons, including 185 metric tons of whole tusks (December 2019)<sup>4</sup> and 74.1 metric tons of cut pieces (March 2019).<sup>5</sup> As of July 2020, there were 16,175 ivory trading facilities managed by 12,886 registered ivory dealers in Japan.<sup>6</sup> Tokyo is home to 2,936 ivory trading facilities managed by 2,525 dealers registered with the government, accounting for 18 percent of the trading facilities across the country.<sup>7</sup>

The Government of Japan claims its market is under strict control, but in reality its poorly-implemented regulatory system is riddled with loopholes that enable illegal ivory trade within Japan and sustained illegal

exports.<sup>8</sup> While the Government of Japan has made superficial efforts to control the trade by amending its regulations over the past several decades, its reforms have proven largely ineffective.<sup>9</sup>

At the core of Japan's ivory controls is the tusk registration system based on the Law for the Conservation of the Endangered Species of Wild Fauna and Flora (LCES).<sup>10</sup> The registration system is the path for ivory to legally enter the market. However, proof of legal origin and acquisition has never been a requirement of the system even though it is a CITES obligation. Third party statements, such as a letter from a friend or family member of the ivory owner, have until recently been routinely accepted as adequate documentation of legality for tusk registration purposes instead of objective evidence such as customs documents or purchase receipts. In July 2019 a carbon dating requirement was implemented for whole tusk registration to prove that their age pre-dates the 1989 CITES ivory ban. However, a vast amount of ivory from potentially illegal sources may have already been legalized and introduced into the legal domestic market since the registration scheme was established in 1995.<sup>11</sup> Another serious loophole is that cut pieces of an ivory tusk are exempt from registration requirements; a trader can avoid costly carbon testing by cutting a tusk into pieces. Furthermore, once a tusk is cut, not only is the registration no longer required, but it is impossible to track and distinguish the individual pieces since marking is not required.

Ivory retailers are therefore engaging in seemingly legal domestic sales that often result in illegal ivory exports. Japan's legal domestic market is supplying the illegal international ivory trade and thus undermining other nations' bans on domestic ivory trade. Since January 2018 through December 14, 2020, at least 76 seizures of ivory from Japan have been made in other nations, with the majority occurring in China.<sup>12</sup> These products, including *hanko* blanks, statues and other carvings, jewelry, scroll painting shaft heads, and whole tusks, have largely been found in packages sent through the mail and identified by the importing country's authorities. A recent study of 422 Chinese consumers who traveled to Japan after China's ivory ban went into effect found that 19 percent planned to purchase ivory and an estimated 12 percent actually did make an ivory purchase.<sup>13</sup> Of those that purchased ivory, 35 percent brought ivory home by plane, 32 percent had the shop mail it to them in China, and 10 percent mailed it back to China themselves.

Eighty percent of Japan's raw ivory consumption is for *hanko*.<sup>14</sup> The seals are used to sign official documents and are made from a variety of materials, including elephant ivory; however, ivory is not a traditional material for *hanko*.<sup>15</sup> With the majority of raw ivory being consumed to supply the *hanko* trade, the *hanko* industry and retailers play a leading role in Japan's domestic ivory market. The present stockpile of ivory *hanko* is 951,456 seals (March 2019).<sup>16</sup>

## HANKO RETAILER INVESTIGATION: RATIONALE AND METHODOLOGY

Given the major role that the *hanko* industry plays in the ivory market, EIA and JTEF have been monitoring the *hanko* trade in Japan. In 2018 an investigator contacted *hanko* retailers via phone in three major urban areas around Tokyo, Osaka, and Nagoya. Fifty-eight percent of the retailers (175/303) were willing to sell an ivory *hanko* knowing it was destined for export, which is illegal, while 42 percent of them (128/303) refused to sell.<sup>17</sup>

As a follow-up to the 2018 investigation, EIA and JTEF instigated two subsequent investigations to determine retailers' willingness to sell ivory *hanko* in 2020.

Investigation A targeted 100 of the 128 *hanko* retailers within the three large urban areas previously investigated.<sup>18</sup> In 2018, all 128 shops declined to sell an ivory *hanko* knowing the intent was export. In 2020, an investigator posing as a customer presenting the same scenario used in the 2018 investigation, and contacted these 100 shops to determine if they would sell an ivory *hanko* to the investigator. The inquiries did not seek to determine whether the shops knew that export of ivory *hanko* is illegal or not since results from 2018 indicated that these previously investigated shops were aware of the export ban.

Investigation B targeted 150 retailers across Japan who were not contacted in the 2018 investigation.<sup>19</sup> These retailers were chosen randomly from the register of ivory business operators<sup>20</sup> which is compiled by the Japan Wildlife Research Center (JWRC) under the direction of the Ministry of Environment (MoE). The selection of stores covered a representative geographic range in Japan including the majority of prefectures. An investigator, posing as a customer, called these 150 *hanko* shops in 2020 to determine if they would sell an ivory *hanko* to the investigator and if they understood that export is illegal. The same scenario from the 2018 investigation was presented: a foreign friend unable to travel to Japan requested the investigator to buy an ivory *hanko* for them.



Ivory *hanko* on sale in investigated shop in Nagano.

## INVESTIGATION RESULTS

### Investigation A: Urban Areas Around Tokyo, Osaka, and Nagoya

The investigator called 100 of the 128 shops that previously declined to sell an ivory *hanko* intended for export. Seventy-five retailers were in the Kanto large urban area, including 48 within Tokyo, and the remaining 25 were in the Kinki large urban area, which includes Osaka, and the Chukyo large urban area, which includes Nagoya.<sup>21</sup> As seen in Table 1, 76 shops (76%) discussed selling an ivory *hanko* with the investigator, including 41 within Tokyo (85% of identified shops in Tokyo).

In 2018 all of the 76 shops refused to sell an ivory *hanko* knowing the customer intended to send it abroad. By contrast, in 2020 38 percent (29/76) of those stores reversed their position, offering to sell an ivory *hanko* under the same circumstances. Of the 41 shops within Tokyo that discussed the sale, 39 percent (16/41) agreed to sell the ivory *hanko*.

### Investigation B: Most of Japan, Excluding Three Large Urban Areas

Of 150 *hanko* shops targeted, 89 (59.3%) responded and engaged in discussions over the phone with respect to selling ivory *hanko*. Forty of the shops (26.7%) had stopped selling *hanko*, either by closing their businesses entirely or switching their focus to concentrate primarily on stationary goods. Two retailers declined to discuss ivory *hanko* sales over the phone, two no longer sell ivory *hanko*, and the remaining 17 could not be reached via phone.

The responses of the 89 stores willing to engage in discussions about ivory *hanko* over the phone with our investigator are displayed in Table 2. Of the 89 shops, 76.4 percent (68/89) attempted to sell the ivory knowing it would be taken abroad and that export is illegal. An additional 14.6 percent (13/89) attempted to sell the ivory *hanko* but did not seem to know that exporting it is illegal. The vast majority – 91 percent (81/89) – of retailers surveyed were willing to sell an ivory *hanko* to customers knowing that they intended to ship it internationally.

Results indicate that most *hanko* retailers are willing to sell ivory knowing that it will be exported internationally, and most are aware that export is illegal. In the 2020 survey of retailers across Japan excluding the large urban areas, a shocking 91 percent (81/89) of retailers were willing to sell ivory *hanko* knowing it would be exported. Moreover, 84 percent of them (68/81) were aware that export is prohibited.

In some cases, retailers gave guidance to the investigator on how to circumvent the authorities to successfully export ivory, cautioning the investigator that it's illegal to export ivory so they need to hide items carefully. For example, one retailer said "Strictly speaking, it is illegal. So, you must take the risk. But, it won't be found because it's considerably smaller than a liquor bottle or something like that."

**Table 1:** Results of calls to *hanko* retailers in urban areas around Tokyo, Osaka, and Nagoya (2020)

Results	Urban Areas around Tokyo, Osaka, and Nagoya	Tokyo
Discussed selling ivory <i>hanko</i> with investigator	76 (76%)	41 (85.4%)
Did not sell ivory <i>hanko</i>	6 (6%)	1 (2.1%)
Refused to talk about selling ivory <i>hanko</i> on the phone	1 (1%)	0 (0%)
Did not discuss sales to customer because it is a wholesaler	1 (1%)	1 (2.1%)
Did not respond to calls*	7 (7%)	3 (6.3%)
Closed the <i>hanko</i> shop	9 (9%)	2 (4.2%)
<b>TOTAL</b>	<b>100 (100%)</b>	<b>48 (100%)</b>

\*including no response, hang ups, busy line, and suspicion of alert to investigation

**Table 2:** Categorized responses of *hanko* retailers across Japan, excluding three large urban areas (2020)

Category	Responses of <i>hanko</i> shops	
<b>I</b>	- Attempted to sell ivory <i>hanko</i> knowing it was destined for export - Offered to export ivory for the customers - Aware that export is prohibited	3 (3.4%)
<b>II</b>	- Attempted to sell ivory <i>hanko</i> knowing it was destined for export - Refused to send ivory <i>hanko</i> abroad on behalf of the customers - Aware that export is prohibited	65 (73%)
<b>III</b>	- Attempted to sell ivory <i>hanko</i> knowing it was destined for export - Unaware that export is prohibited	13 (14.6%)
<b>IV</b>	- Refused to sell ivory <i>hanko</i> knowing that the customers intended to export	8 (9.0%)
<b>TOTAL</b>		<b>89 (100%)</b>

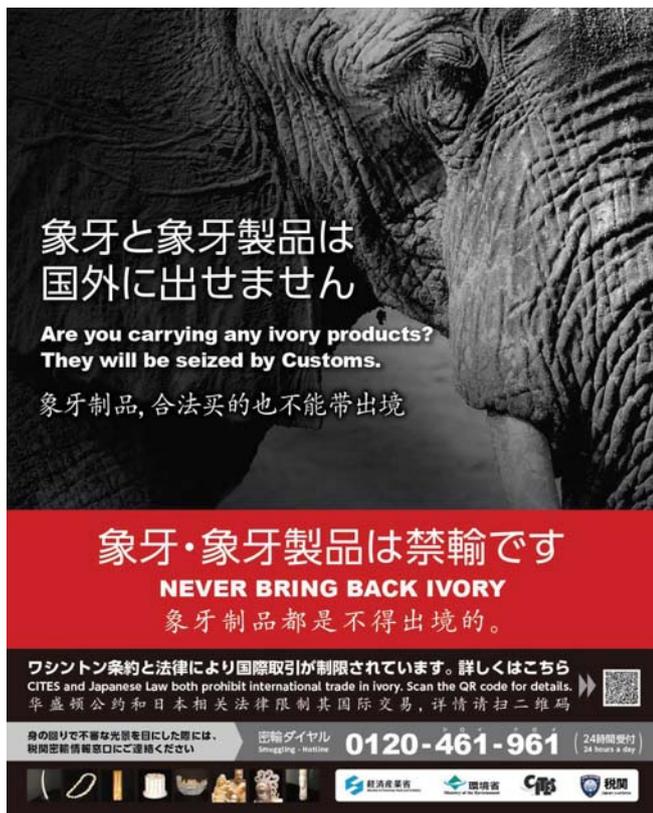
## GOVERNMENT AWARENESS CAMPAIGN FAILURE

The *hanko* investigation results demonstrate the abject failure of the Government of Japan's awareness campaign directed at preventing the illegal export of ivory from Japan. The Government of Japan, through the MoE and the Ministry of Economy, Trade and Industry (METI), has been running an awareness campaign about the illegality of ivory import and export since 2017. Large posters are visible in airports and displayed in ivory retailers' shops in a campaign designed to impact both retailer and consumer behavior. Ivory and *hanko* associations, such as the Japan Federation of Ivory Arts and Crafts Association (JIA) and the Japanese Seal Engravers Association, have also shared messaging about the illegality of ivory export directed to retailers. Some of this outreach was done as part of the "Public-Private Council for the Promotion of Appropriate Ivory Trade Measures" effort in 2017.<sup>22</sup>

However, these efforts have been largely ineffective, as demonstrated by the involvement of a member of the

JIA as the domestic source of ivory in an illegal export case involving Chinese traders. In November 2017, a Chinese man was arrested when he attempted to board a container vessel anchored at Tokyo Port with 605 pieces of ivory cut in preparation to be made into name seals, valued at US\$2,790. All Japan Ivory Wholesaler Center (All Japan), a member of the JIA, manufactures, wholesales, and retails ivory *hanko*, and was the source of the ivory. The Asahi Shimbun reported on this criminal case in February 2018 and included a series of photos of the shop in the article. In the photos, a large government awareness campaign poster is clearly visible in the window.<sup>23</sup> The Metropolitan Police Department searched the shop and arrested a board member/ operations supervisor. He and his company received an administrative punishment from Tokyo Customs,<sup>24</sup> but the prosecution was later dropped.<sup>25</sup>

The All Japan case illustrates the lack of impact a simple awareness campaign sign can have on retailers and customers intent on engaging in illegal activity when the benefits clearly outweigh the costs. The results of the two investigations demonstrate that raising awareness



Government of Japan poster warning of the illegality of elephant ivory import and export.



All Japan Ivory Wholesaler Center shop in Tokyo February 2018, with government awareness campaign sign featured in the window. Photos shared with permission by The Asahi Shimbun.

to the businesses about the prohibition on ivory export is largely ineffective as a practical measure for preventing illegal export. It appears that most retailers are willing to disregard the commitment to preventing the export of ivory when presented with an eager customer and potential sale. As long as selling ivory can be considered legal and retailers can avoid direct involvement in export and shift the legal responsibility to the customers, this is unlikely to change. Awareness campaigns designed to eliminate illegal wildlife trade can be effective, but only when there is a sufficient incentive to change behavior, such as effective enforcement of strong laws.

## TOKYO'S IVORY TRADE

The failure of the government's awareness campaign is especially obvious in Tokyo, which accounts for 18 percent of Japan's ivory facilities and is arguably the epicenter of Japan's ivory trade. In our investigations, 39 percent of retailers in Tokyo that in 2018 opted not to sell an ivory *hanko* knowing it would be exported reversed their stance and were willing to engage in a sale in 2020. In the 2017 All Japan case, the ivory was purchased at the shop in Tokyo and managed by an ivory trader registered with the government.

In January 2020, after taking into consideration international momentum to close ivory markets and Tokyo's role as an international city, the Tokyo Metropolitan Government announced the establishment of an Advisory Committee on Regulation of Ivory Trade.<sup>26</sup>

The purpose of Tokyo's ivory trade assessment is to examine the existing regulations and propose measures that Tokyo should take to prevent the illegal trade and export of ivory, including exploring more meaningful measures than those taken by the national government.

## JAPAN'S ILLEGAL EXPORTS: UNDERMINING OTHER NATIONS' IVORY BANS

Japan's failure to prevent illegal ivory exports at the border and the failure of the government's awareness campaign pose a threat to international efforts to combat elephant poaching and the illegal ivory trade. Traders are able to exploit loopholes and a lack of border enforcement.

For example, in China the General Administration of Customs, together with other Chinese enforcement agencies, has been able to follow up on evidence from small-scale seizures to initiate subsequent investigations. These investigations have revealed several cases of organized trafficking of ivory and other wildlife products into China. As one case in 2018 demonstrated, the Urumqi Customs intercepted a package mailed from Japan that contained less than one kilogram of ivory and a few red coral products.<sup>27</sup> Chinese authorities launched an investigation that uncovered a sophisticated operation involving an ivory trader based in Yancheng who sold ivory and other wildlife products to a network of buyers located in at

least 14 cities in 11 different provinces. The trader worked with two Chinese agents based in Japan where they purchased ivory legally before shipping the products in mis-declared packages from their Osaka warehouse to China.

It is clear that while many seizures of Japanese ivory made in China typically consist of small amounts of ivory, they represent only the tip of the iceberg and are almost certainly an underestimate of the actual level of trade. Japanese ivory has also been seized in jurisdictions outside of mainland China, including Vietnam and Taiwan, in recent years. As other countries continue to close down their own domestic ivory markets, it is likely that ivory consumers, including organized illegal wildlife traders, will increasingly turn to Japan to exploit the readily available source of ivory.



In China, officials have made at least 72 seizures of ivory from Japan between January 1, 2018 and December 14, 2020, according to public sources.

See: <https://eia-global.org/japansillegalivoryexports>

## CONCLUSION

**Results from the snapshot investigations are concerning and indicate the need for a completely new approach from the Japanese government. Even though most sellers were aware that ivory exports are illegal, the vast majority of them chose to engage in a sale regardless.**

Retailers who are willing to sell ivory intended for export know they are able to avoid retribution by declining to ship the item. The government's approach of raising awareness without effective enforcement to prevent illegal activity has been a failure, both in terms of reaching retailers and influencing consumer behavior. Japan's flawed approach has been to make superficial regulatory reforms and ask for help from the private sector to comply with CITES and its own laws; however, as long as domestic sales are legal this approach is meaningless and even deceptive.

Japan's legal domestic ivory market continues to contribute to the illegal international ivory trade problem and will continue to do so particularly as other nations implement their own domestic trade bans and consumers shift their attention to the readily available source of ivory offered in open domestic markets. The only clear course of action for the Government of Japan is to close its ivory market. Moreover, in Tokyo, the representative international city, the Tokyo Metropolitan Government should lead by adopting and implementing bold measures to ban ivory trade within its jurisdiction.

## RECOMMENDATIONS

### FOR THE GOVERNMENT OF JAPAN:

- Close the ivory market urgently to align with commitments under CITES Resolution Conf. 10.10 (Rev. CoP18).
- Japan Customs should prioritize the interdiction of illegal ivory exports and take necessary actions to implement such a policy.

### FOR THE TOKYO METROPOLITAN GOVERNMENT:

- Prohibit the sale and purchase of ivory, as well as the display or advertisement of ivory for sale, within the Tokyo jurisdiction as soon as possible through an Ordinance adopted by the Tokyo Metropolitan Assembly.
- Before Tokyo's ivory market closure is fully implemented, prior action should be taken, including:
  - Issuing an urgent declaration of a Tokyo policy to pursue being an ivory-free international city;
  - Adopting guidelines on ivory sales to be in effect until a ban enters into force, including advising ivory dealers in Tokyo to suspend ivory sales in accordance with the impending Tokyo policy; and,
  - Implementing an awareness and demand reduction campaign for Japanese consumers and international visitors on the Tokyo policy and the forthcoming Tokyo regulation.
- The Tokyo Metropolitan Police Department should elevate law enforcement efforts to stop the illegal trade and export of ivory.

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