



May 10, 2022



The Honorable Yuriko Koike
Governor of Tokyo
Secretarial Section, General Affairs Division, Office of the Governor for Policy Planning
Tokyo Metropolitan Government
8-1 Nishi-Shinjuku 2-chome
Shinjuku-Ku, Tokyo 163-8001
Japan



Re: Advisory Council's Recommendations on Tokyo's Ivory Trade

Dear Governor Koike:



We were pleased to see that the final [recommendations](#) from the Tokyo Metropolitan Government's (TMG) designated Advisory Council on Regulation of Ivory Trade were issued after seven meetings and more than two years of discussions and deliberations. Now it is time for the TMG to follow through on its commitment and take action to address concerns about Tokyo's ivory trade by implementing the recommendations of the Advisory Council to guide Tokyo's path forward.



In particular, we believe the third recommendation has the most potential for impact and deserves the most attention: "[...] Ivory trade is regulated by legal frameworks in major countries around the world as well, and it is permitted with the limited exception of art and such items. The Tokyo Metropolitan Government should consider legal or other effective means to ensure that the ivory trade does not contribute to elephant poaching and illegal trade, while appreciating the cultural and artistic aspects of Japanese ivory products."



We hope that TMG will heed the advice of the Advisory Council by enacting an ordinance adopted by the Tokyo Metropolitan Assembly to close the ivory market in Tokyo with only narrow exemptions. Tokyo comprises 20 percent of Japan's ivory market, and as an international city is obligated to set an example for the rest of the country by taking steps to eliminate its role in the ivory trade problem, particularly while action by the national government on this issue remains stagnant. As you and the Advisory Council have noted, international concern has been raised by the mayor of New York City and other stakeholders including U.S. government representatives and African governments that are members of the African Elephant Coalition, which is composed of more than 30 African nations, among many others who have expressed support for the closure of Tokyo's—and Japan's— ivory market.



Japan's legal ivory market has been identified by the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) as a market of concern given its considerable size and because it is the source of a steady stream of illegal ivory exports. Under CITES, to which Japan has been a Party since 1980, Japan is obliged to ensure its domestic ivory market is not contributing to elephant poaching or illegal trade in ivory; however, ample evidence illuminates how Japan's market does in fact contribute to illegal trade. Japan's market is being targeted by international buyers looking to purchase ivory within Japan's legal market and then export it illegally. The legal ivory market in Japan is thus undermining market closures and enforcement efforts by other nations, including China as well as range countries for elephants in Africa and Asia. To prevent illegal exports, ivory trade controls must be further tightened – the domestic market must be closed.



The 19th meeting of Conference of the Parties (CoP19) to CITES will be held in November 2022, and the closure of domestic ivory markets will be on the agenda. It is important for Japan to make its commitment to closing its ivory market clear to the international community before CoP19. To





bring Japan's domestic ivory market into compliance with CITES Resolution Conf. 10.10 (Rev. CoP18), which compels all countries with open ivory markets contributing to poaching or illegal trade to close them, the Law for Conservation of Endangered Species of Wild Fauna and Flora and its bylaws must be reviewed and amended to close its domestic ivory market with limited exemptions.



While the Government of Japan should certainly take action at the national level to eliminate ivory trade, considering the uncertainty of future action by the national government, Tokyo should consider legal measures to take within its jurisdiction immediately. Legal ivory markets threaten the future of elephants in the wild. They create cover for the trade in illegal ivory, stimulate consumer demand for ivory by validating the product, undermine government enforcement efforts, conflict with demand reduction programs, and are easily exploited to supply ivory for illegal export. Legal action within Tokyo will send a strong global signal that Tokyo takes its role as an international leader seriously. The time has come for Japan to show the world that it is committed to ensuring a future for elephants in the wild, and Tokyo can lead the way.



PERFORMING ANIMAL WELFARE SOCIETY



Governor Koike, we thank you for your leadership thus far and in advance for the forthcoming action from the TMG. We hope that the Tokyo Metropolitan Government will implement what the Advisory Council has recommended so Tokyo may move forward to join the international community in protecting elephants from the threats posed by ivory trade.

Respectfully yours,

- Jan Creamer | President | **Animal Defenders International**
- Cathy Liss | President | **Animal Welfare Institute**
- Daniel M. Ashe | President and CEO | **Association of Zoos & Aquariums**
- Will Travers, OBE | Executive President | **Born Free Foundation**
- Sarah Uhlemann | International Director | **Center for Biological Diversity**
- Ericka Ceballos | Chief Executive Officer | **CATCA Environmental and Wildlife Society**
- Lawrence Avery | Programmes & Policy Manager | **David Shepherd Wildlife Foundation**
- Ian Redmond | Head of Conservation | **Ecoflix**
- Allan Thornton, OBE | President | **Environmental Investigation Agency**
- Vera Weber | President | **Foundation Franz Weber**
- Heike Henderson-Altenstein | Member of the Board | **Future for Elephants e.V.**
- Rebecca Regnery | Senior Director, Wildlife | **Humane Society International**
- Grace Gabriel | Asia Regional Director | **International Fund for Animal Welfare**
- Kumi Togawa | President | **Japan Tiger and Elephant Fund**
- Kiyoshi Ogawa | President | **Japan Wildlife Conservation Society**
- Elly Pepper | Deputy Director, International Wildlife Conservation | **Natural Resources Defense Council**

- Iris Ho | Head of Campaigns and Policy | **Pan African Sanctuary Alliance**
- Catherine Doyle, M.S. | Director of Science, Research and Advocacy | **Performing Animal Welfare Society**

- Daniela Freyer | Co-Founder | **Pro-Wildlife**
- Frank Pope | Chief Executive Officer | **Save the Elephants**
- Rob Brandford | Executive Director | **Sheldrick Wildlife Trust**
- Dr. Trevor Jones | Chief Executive Officer | **Southern Tanzania Elephant Program**
- Will Travers | President | **Species Survival Network**
- Fiona Gordon | Ambassador – Wildlife Trade | **the Jane Goodall Institute New Zealand**
- Peter Knights | Chief Executive Officer | **WildAid**
- Dr. Paula Kahumbu | Chief Executive Officer | **WildlifeDirect**
- Susan Lieberman, Ph.D. | Vice President, International Policy | **Wildlife Conservation Society**

