



26 September 2016

The Hon Josh Frydenberg MP
Minister for Environment and Energy
PO Box 6022
House of Representatives
Parliament House
Canberra ACT 2600

Dear Minister

Domestic trade ban on all rhino horn and elephant ivory

We the undersigned ask the Australian Federal Government to show leadership, by enacting a complete ban on the domestic trade of rhino horn and elephant ivory.

Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) parties and stakeholders are set to debate their pro trade or no trade positions again this year at CITES CoP17, whilst the species themselves are disappearing before our very eyes. Part of the reason for the on-going debate is that quantifiable information (data and analysis) on species, trade and the effects of trade, are heavily relied upon to inform CITES decision-making. However, there remain gaps in this knowledge base and in all likelihood these gaps will never be fully closed - as the issue is constantly and rapidly evolving. For example:

- It was not established until as recently as 2015 that Tanzania had lost 60% of its elephants over the preceding 5 years¹;
- Until the Great Elephant Census there had not been a pan-African census in over 40 years, and none were completed using a standardized process and an independent validation process²;
- Until the June 2016 publication of a National Bureau of Economic Research (NBER) Working Paper finding that the international announcement of the 2008 legal ivory sale corresponds with an abrupt increase in illegal ivory production³, previous TRAFFIC analysis had consistently been inconclusive on such matters⁴;
- A July 2016 report concludes that the “Vietnamese illegal ivory trade is now one of the largest in the world” and “while the illegal rhino horn trade in Vietnam has been heavily criticized, its recently booming ivory trade has been largely overlooked due to a lack of information about it”⁵.

The ideology around requiring definitive hard data can stifle significant movement or positive action toward saving these iconic species, and all too often the hard data arrives far too late. Importantly, Principle 15 of the 1992 Rio Declaration sets out the Precautionary Approach “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation”⁶.

The wait for full scientific certainty is causing critical time to be wasted in endless debate over what to do. In the meantime, environmental crime, which encompasses wildlife trafficking, is now the world’s 4th largest criminal enterprise, after drug smuggling, counterfeiting, and human trafficking⁷. Despite the commendable increased enforcement resulting in seizures and prosecutions, corruption is rife⁸ and the illegal trade continues with end users, consumers and criminal syndicates using available legal loopholes that enable them to continue banking on extinction⁹. Clearly, the current efforts are not having the desired impact.

In communities worldwide, extinction anxiety is building and more-and-more concerned citizens are turning to their governments to ask them to step into the void and enact domestic bans, including New York, New Jersey, California¹⁰, Hawaii¹¹ and most recently France¹².

We ask that Australia takes decisive and clear action now, within it’s own jurisdiction, to target the matters at the very heart of this issue: consumer demand and legal domestic markets. A domestic ban would close down markets which ultimately provide a means to dispose of illegal rhino horn and ivory - an activity that undermines the rule of law, international trade bans and the CITES processes. A publicly announced domestic ban would help to reaffirm ivory and rhino horn as unacceptable commodities.



As a collective we ask for action in the Oceanic region. It's time for courageous and visionary leadership from all corners of the globe, to 'do their bit' to stop the slaughter. Too much is being asked of Africa's wildlife, particularly the elephants, rhino and lion, under the 'if it pays it stays' approach - animals have a right to exist, well beyond being viewed as mere commodities.

We commend the Australian Government on their truly global leadership as demonstrated with the implementation of a ban on the importation of lion trophies and body parts - a visionary and courageous step taken by Minister Greg Hunt. Announced in March 2015, months before the death of Cecil, this ban could well be considered the biggest step for lion conservation, inspiring France and the Netherlands to follow Australia's lead by implementing bans, and with the United States placing severe restrictions on lion imports.

We, the undersigned, cannot bear to be witness to the continued annihilation of these animals. As we mark the start of CITES CoP17 in Johannesburg and the Global March for Elephant, Rhino and Lion, on 24 September 2016 in Australia and around the world, we stand as one, we stand for wildlife and ask Australian Federal Government to enact a complete ban on the domestic trade of rhino horn and elephant ivory.

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End Notes

- 1 www.theguardian.com/environment/2015/jun/02/tanzania-epicentre-of-elephant-poaching-census-reveals
- 2 www.greatelephantcensus.com/the-census/
- 3 Solomon Hsiang, and Nitin Sekar (June 2016) "Does Legalization Reduce Black Market Activity? Evidence from a Global Ivory Experiment and Elephant Poaching Data" NBER Working Paper No. 22314.
- 4 CoP16 Doc. 53.2.2 (Rev. 1) ETIS REPORT OF TRAFFIC Sixteenth meeting of the Conference of the Parties Bangkok (Thailand), 3-14 March 2013
- 5 Lucy Vigne and Esmond Martin (2016) "VIETNAM'S ILLEGAL IVORY TRADE THREATENS AFRICA'S ELEPHANTS" Save the Elephants, PO Box 54667, Nairobi 00200, Kenya.
- 6 Rio Declaration on Environment and Development.
- 7 UNEP/INTERPOL (2016) The Rise of Environmental Crime - A GROWING THREAT TO NATURAL RESOURCES, PEACE, DEVELOPMENT AND SECURITY: A UNEP--INTERPOL RAPID RESPONSE ASSESSMENT.
- 8 Elizabeth L. Bennett (7 August 2014) Legal ivory trade in a corrupt world and its impact on African elephant populations. Conservation Biology. Volume 29, Issue 1. February 2015 Pages 54-60
- 9 For example: Julian Rademeyer (2016) Tipping Point Transnational organised crime and the 'war' on poaching. 2016 Global Initiative against Transnational Organized Crime and Julian Rademeyer (2016) Beyond Borders Crime, conservation and criminal networks on the illicit rhino horn trade. 2016 Global Initiative against Transnational Organized Crime.
- 10 African Wildlife Foundation (8/11/2015) <https://www.awf.org/blog/state-play-us-ivory-trade-legislation>
- 11 Hawaii State Legislature. Act 125.
- 12 France introduces total ban on ivory sales 17-08-2016 <http://en.rfi.fr/environnement/20160817-france-introduces-total-ban-ivory-sale>



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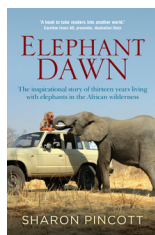


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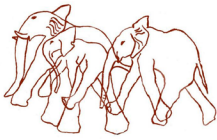
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