



**POLISHING OFF THE IVORY:
SURVEYS OF THAILAND'S
IVORY MARKET**

NAOMI DOAK

A TRAFFIC REPORT

TRAFFIC
the wildlife trade monitoring network

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Front Cover Ivory bracelets on sale in Tha Phrachan market, Thailand © James Morgan/WWF-Canon.
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Contents African Elephants, Kenya © Martin Harvey/WWF-Canon; **Page 3** Elephant slaughter, Cameroon © WWF-Canon/Green Renaissance; **Page 4** Ivory buddhist sculptures © Daniel Stiles/TRAFFIC; **Page 5 (top left)** African Elephant, South Africa © Naomi Doak; **(top right, bottom left)** Ivory items on sale in Bangkok © Naomi Doak/TRAFFIC; **(bottom right)** Asian Elephant mother and calf © naturepl.com/Andy Rouse/WWF-Canon; **Page 6** African Elephant mother and calf © Martin Harvey/WWF-Canon; **Page 7** © Naomi Doak/TRAFFIC; **Page 8 (bottom)** © Naomi Doak/TRAFFIC; **Page 10** © Naomi Doak/TRAFFIC; **Page 11** © Naomi Doak/TRAFFIC; **Page 15** African Elephant bull, South Africa © Naomi Doak; **Back Cover** African Elephants, Kenya © Martin Harvey/WWF-Canon.



EXECUTIVE SUMMARY

Elephants are revered in Thailand and, as an important part of the country's identity, they are an integral part of Thai beliefs and culture. However, despite this, **Thailand has one of the world's largest unregulated ivory market and is consistently highlighted as one of the most**

problematic countries in the illegal ivory trade. Partly to blame for the current poaching crisis is Thai domestic legislation that permits trade in ivory from domesticated Asian Elephants but provides no effective mechanism or legal framework for the internal regulation of this market nor for the control of the illegal trade in ivory from either wild Asian Elephants *Elephas maximus* or African Elephants *Loxodonta africana*.

Recent surveys of retail outlets across key locations in Bangkok have revealed a disturbing increase both in the number of retail outlets offering ivory as well as the quantity of ivory available. Surveys of known ivory retail outlets were carried out on a monthly basis from January–April 2013 and October 2013–May 2014. The type and number of ivory items seen for sale were recorded. Retail outlets, including those newly identified and those that only began stocking ivory during the survey period, were repeatedly revisited on subsequent surveys. In January 2013, 61 retail outlets selling ivory were found in key previously-identified locations around Bangkok while less than 12 months later, in December 2013, this figure had increased to 105 retail outlets in the same locations. During this period, the number of individual ivory pieces almost trebled, from 5,715 to 14,512, indicating a growing market and considerably exceeding what could be produced by ivory from the current domesticated elephant population. There are approximately 1,230 adult male captive elephants in Thailand and it is estimated that they could only yield approximately 650 kg of ivory annually, possibly less and typically in small sized pieces owing to the periodic trimming of tusks. This quantity is considerably less than what was observed in Bangkok markets. In addition, the number and size of specific products indicates that larger sized elephant tusks are reaching the market in Thailand and seizure data confirms attempts to move large quantities of African Elephant ivory to Thailand from Africa.

Additional retail outlets, including newly established ivory outlets, were recorded in every month of the survey, despite a requirement for registration and monitoring of any retail outlet selling or processing ivory under current legislation (*Commercial Registration Act of 1956*). These findings are indicative of a lack of implementation of Thailand's CITES Ivory Trade Action Plan, which was drawn up to meet recommendations from the 64th meeting of the CITES Standing Committee. Indeed, the actions outlined in that plan do not appear to be having any impact on the domestic ivory market in Bangkok. **The ivory market in Thailand is still thriving and remains one of the largest and most active worldwide, with high turnover of stock and continued sales to foreign tourists.**

A statue of Erawan, the three headed elephant god, outside the Grand Palace in Bangkok.

INTRODUCTION: ELEPHANTS IN DANGER

Poaching of elephants for the illegal trade in ivory has escalated dramatically in recent years and is now amongst the greatest threats to these majestic and iconic flagship species, jeopardizing decades of dedicated conservation efforts. The current demand for ivory by consumers mainly in Asia is unprecedented since the global ivory trade ban was agreed under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1989 and appears to be largely driven by demand for products as a demonstration of economic and social status.

The illegal ivory trade is having a devastating impact on wild elephants, particularly in Central Africa where many populations are plummeting towards local extinction; more than 20,000 elephants are estimated to have been killed in Africa in 2013 for their ivory, averaging over 50 elephant deaths every single day.

In 2011, poaching levels, estimated from elephant carcasses, were the highest in a decade, while in the same year a record quantity of ivory was seized worldwide: 50.7 tonnes. It is believed that illegal trade in ivory has trebled since 1968 and more than doubled since 2010.



FIGURE 1 Trade routes for large-scale (>500 kg) seizures of ivory, 2009 - 2011 (ETIS, 03 November 2013).



In early 2012, at least 50% of the elephant population in Cameroon's Bouba N'Djida National Park were slaughtered. Horse back poachers killed over 650 elephants during the first three months of the year with no concern for age, sex or social status of the elephants.

BACKGROUND: IVORY TRADE IN THAILAND

The sale of ivory from Thai domesticated elephants is currently allowed within Thailand. The tips of the tusks from male domesticated elephants are sometimes pruned or trimmed and this provides one potential source of legal ivory to be worked and sold within the country. Currently this market is unregulated with neither the raw ivory nor the products produced from it requiring individual certificates or proof of origin.

The market created by allowing unregulated trade in domesticated elephant ivory not only feeds the demand for ivory products but also provides an avenue for the sale of illegal African Elephant ivory, contributing to the current poaching crisis in Africa. Furthermore, it is currently impossible to visually determine whether ivory on sale is from wild Asian or African Elephants or if it is from domesticated Thai elephants, meaning enforcement agencies are unable to detect illegal ivory from wild elephants in the Thai domestic market.

An understanding of the scale of the current ivory market in Thailand, including the number of retail outlets selling ivory and the number and type of products on sale, is vital to understanding the dynamics of ivory trade in Thailand and to its regulation.

In 2001, surveys in Thailand identified 88,179 ivory products in 194 ivory retail outlets and at least 70 ivory carvers (Martin and Stiles, 2002). Further research, conducted over 2006/2007 and revisited in 2008, documented 26,277 ivory items in 270 retail outlets in five cities and at least 60 carvers (Stiles, 2009), with more than 150 retail outlets selling ivory in Bangkok alone.

A follow-on initiative to track ivory stock turnover was undertaken by TRAFFIC in October-December 2010. Repeat surveys of 35 retail ivory outlets in Bangkok saw observed stocks grow from 4,822 ivory products to at least 5,537 items over the three-month period, close to a 15% increase in worked ivory products, irrespective of any sales that might have occurred during the survey period.

While current laws allow for a legal trade in ivory from domesticated Thai elephants, a Ministerial Order of 5th March 2009 requires ivory processors and vendors to keep records and documents that relate to trade in ivory for inspection. However, hundreds of individuals in Thailand's ivory industry appear not to have registered and fall outside the system with only 67 locations throughout the entire country reportedly registered at the time of the CITES 16th Conference of the Parties (CoP16) in Bangkok in March 2013.

The results from the 2010 surveys alone indicate there was more ivory for sale than could be produced by domesticated elephants in Thailand (in 2010, there were 1,237 registered male elephants; see page 13). Additionally, since 2009 Thailand has seized 11,363 kg of raw ivory mostly coming from Africa. These facts are indicative of Thailand's role in the global illegal ivory trade.

To provide an up-to-date picture of the current trade in ivory across Bangkok, TRAFFIC conducted surveys in 2013 and early 2014 of retail outlets offering ivory items for sale. The results are discussed below.



BACKGROUND: CITES AND THAILAND

Thailand has been a signatory to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) since 1983. A legally-binding treaty between nations, CITES aims to ensure that the international trade in wild animals and plants does not threaten their survival.

Asian Elephants have been listed in CITES Appendix I since 1975, making the international commercial trade in specimens, including their ivory, prohibited except under exceptional licensed circumstances. All African Elephants were listed in Appendix I in 1990, although some populations in Zimbabwe, Botswana, and Namibia were subsequently moved to Appendix II in 1997, and in South Africa in 2000, because populations were deemed to meet the criteria established in *Resolution Conf. 7.9 on the African Elephant and Criteria for the Transfer of Certain African Elephant Populations from Appendix I to Appendix II*.

Thailand, as a signatory to CITES, is required to regulate ivory trade through implementing national laws and systems that support CITES provisions. The *Wild Animal Preservation and Protection Act* of B.E. 2535 (1992) is the national legislation that assists in the implementation of Thailand's CITES commitments. The Act covers all wild Asian Elephants, which are also covered under the *National Park Act* (1961).

There are numerous national laws, Ministerial regulations and even provincial decisions regarding elephants in Thailand and the sale of their products. The *Commercial Registration Act* of B.E. 2499 (1956) includes a requirement that any location processing ivory for crafts or handicrafts or engaged in ivory retail or wholesale must be registered with government.

CITES-related monitoring has repeatedly demonstrated that Thailand is not in compliance with its treaty obligations. Laundering of illegal ivory into loosely controlled domestic markets has led to repeated calls for loopholes in Thai legislation to be addressed. As a responsible member of the global community, Thailand cannot distance itself from these problems, neither can the country ignore its international treaty obligations. When Thailand joined CITES in 1983, it accepted an obligation to verify the origins of its existing ivory stockpiles and prevent any unauthorized importation of new ivory or exportation of worked ivory products. More than two and a half decades have passed since then, but Thailand has still not fulfilled this international commitment.

Ongoing failure to act is costing elephants dearly and could also cost Thailand economically. CITES carries the threat of trade suspensions against countries that do not comply with treaty requirements. At the 23rd meeting of the CITES Standing Committee, the CITES Secretariat presented a detailed report which focused on Thailand's failure to implement the Convention during the period 1988 through March 1991. This led the Standing Committee to support a trade ban against Thailand that was in effect from 22 April 1991 through 30 June 1992 when it was lifted following the introduction of new wildlife trade legislation in Thailand. If trade suspensions were employed against Thailand again for failure to regulate its ivory trade in accordance with CITES requirements found in *Resolution Conf. 10.10 (Rev. CoP 16)* on trade in elephant specimens, the country could subsequently lose approval to trade any CITES-listed plant and animal species internationally. Such a development would, for example, prevent exports





of orchids by the country's horticultural sector, which could result in a loss of more than USD 80.7 million (THB 2.6 billion) in annual sales based on the value of this trade in 2013. Other CITES exports from Thailand include: ornamental plants (cycads, cacti and succulents), reptile skins for the fashion industry (crocodiles, pythons and monitor lizards), pets and aquarium fishes, and aromatic wood for perfume manufacture. These export trades could be jeopardized, as well as imports of any CITES-listed species. In total, the economic effects would be disastrous; Thailand reported international trade in more than 25 million CITES items between 2010 and 2011, with an estimated value of USD157 million (more than THB5 billion) for just some of the CITES-listed export items in 2012.

MARKET RESEARCH: METHODS

Between January–April 2013 and October 2013–May 2014, TRAFFIC carried out monthly surveys in Bangkok retail outlets offering ivory for sale including any newly identified outlets (Table 1) and conducting surveys across 4 - 5 days each month. Visits to each market area were conducted on consecutive days in each month. Surveys were conducted without the vendors' knowledge or prior warning to ensure items were not removed from view and that surveyors were not chased away from the retail outlets.

Initial surveys focussed on 119 shops from ten general locations around Bangkok identified in previous work (Martin and Stiles, 2002; Stiles, 2004; Mather undated; Stiles, 2009) with additional locations and retail outlets identified and recorded each month; all of these locations were then revisited in the repeat surveys. New outlets were identified in each month of the surveys.

The surveys were undertaken by trained consultants able to identify ivory visually reliably. Where possible, photos were obtained to assist with estimates of the quantity of ivory. However, many of the vendors are currently wary of reporters and do not allow photographs to be taken and become aggressive if pressed for information on the source of the ivory being sold. Estimates of the number of each type of product were done visually noting that items seen in any one month may have remained in the outlet in subsequent months.

Data collected included details on the shop location, the type of ivory products on display and an estimate of the number of each type of product displayed. Locations previously identified as offering ivory items were visited during the following month and, if individual retail locations were closed during the survey, this was noted. Surveys were conducted by native Thai speakers and, where possible, vendors were informally interviewed to determine prices and other details on products. Most vendors were not forthcoming with further details in regards to the source of ivory, the price of individual items or the main nationality of the buyers.

The monthly counts of retail outlets and the number of items were analysed and the counts and types of products were broken down following the system developed by Martin and Stiles (2002, 2003, 2005, 2008, 2009) to allow for standardized comparisons of the indicators between place and time. Given the difficulty in obtaining price data for individual items, and the many factors affecting price (e.g. nationality of the buyer, familiarity with the seller), these data were not included in the final comparison.

TABLE 1 Number of Surveyed Bangkok Retail Outlets and Surveyed Retail Outlets Selling Ivory*

| | Jan 2013 | Feb 2013 | March 2013 | April 2013 | Oct 2013 | Nov 2013 | Dec 2013 | Jan 2014 | Feb 2014 | March 2014 | April 2014 | May 2014 |
|----------------|--------------|--------------|---------------|---------------|--------------|---------------|----------------|----------------|----------------|----------------|----------------|----------------|
| Jatujuk Market | 17 16 | 18 13 | 18 15 | 28 15 | 21 20 | 25 21 | 28 24 | 35 31 | 38 32 | 47 34 | 50 31 | 50 37 |
| Jatujak Mall | 15 15 | 16 16 | 26 13 | 30 19 | 19 18 | 21 19 | 24 22 | 25 22 | 25 23 | 31 28 | 31 28 | 32 29 |
| River City | 10 10 | 15 12 | 14 8 | 15 8 | 17 12 | 17 13 | 17 15 | 18 15 | 18 11 | 18 14 | 18 14 | 18 12 |
| Amulet Market | 13 12 | 16 15 | 21 17 | 20 17 | 14 12 | 15 12 | 20 18 | 22 15 | 22 20 | 24 19 | 25 17 | 27 19 |
| MBK Center | 1 0 | 7 7 | 7 6 | 7 3 | 15 15 | 15 14 | 16 14 | 16 13 | 16 12 | 16 13 | 16 13 | 17 13 |
| Amarin Plaza | 0 0 | 2 2 | 2 1 | 2 2 | 3 2 | 3 3 | 3 2 | 3 3 | 3 3 | 3 3 | 3 3 | 3 3 |
| Other | 15 8 | 9 3 | 14 3 | 5 5 | 6 6 | 6 3 | 11 10 | 14 10 | 14 12 | 14 9 | 14 7 | 15 7 |
| TOTAL | 71 61 | 83 68 | 102 63 | 107 69 | 95 85 | 102 85 | 119 105 | 136 109 | 136 113 | 153 120 | 157 113 | 162 120 |

* Number of surveyed retail outlets selling ivory shown in red

TABLE 2 Number of Ivory Products in Surveyed Retail Outlets in Bangkok

| | Jan 2013 | Feb 2013 | March 2013 | April 2013 | Oct 2013 | Nov 2013 | Dec 2013 | Jan 2014 | Feb 2014 | March 2014 | April 2014 | May 2014 |
|----------------|--------------|--------------|--------------|--------------|--------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| Jatujuk Market | 2,750 | 3,557 | 3,602 | 3,515 | 4,293 | 5,114 | 5,900 | 5,897 | 5,560 | 3,963 | 5,839 | 5,618 |
| Jatujak Mall | 370 | 547 | 128 | 683 | 607 | 968 | 965 | 917 | 1,056 | 1,251 | 1,560 | 1,584 |
| River City | 396 | 873 | 535 | 1,199 | 1,202 | 1,381 | 1,332 | 1,318 | 1,147 | 1,173 | 1,159 | 1,013 |
| Amulet Market | 1,814 | 3,936 | 4,250 | 4,111 | 2,150 | 2,617 | 5,630 | 2,376 | 3,895 | 3,684 | 4,682 | 4,522 |
| MBK Center | 0 | 102 | 49 | 21 | 141 | 153 | 217 | 178 | 175 | 177 | 159 | 152 |
| Amarin Plaza | 0 | 142 | 276 | 301 | 397 | 285 | 158 | 316 | 320 | 277 | 245 | 325 |
| Other | 385 | 164 | 58 | 19 | 25 | 13 | 310 | 320 | 381 | 187 | 177 | 23 |
| TOTAL | 5,715 | 9,321 | 8,898 | 9,849 | 8,815 | 10,531 | 14,512 | 11,322 | 12,534 | 10,712 | 13,821 | 13,237 |





MARKET RESEARCH: RESULTS

Results from the latest surveys were similar to those from earlier work (Martin and Stiles 2001, Stiles 2006–2007, Stiles 2008), with 167 individual locations identified in total but with an increase in the number of locations across the duration of the surveys. The highest number of retail outlets visited in any one month was 162 in May 2014 and the lowest number of outlets visited was 71 in January 2013 (Table 1).

During the survey period, the number of ivory retail outlets varied. Some shops were closed at the time of the survey, or had closed completely or changed from a shop offering ivory to another type of store. Meanwhile, new individual retail outlets were found—either due to a change in stock to items including ivory, or new ivory outlets that had not been recorded in previous months. Even in May 2014, the eighth consecutive month of the most recent survey period, new ivory retail outlets were still being identified.

Products on display included large pendants, bangles and bracelets, rings, toothpicks, hairpins, chopsticks, cigarette lighter holders, hair pins, broaches and sculptures of elephants. Very few large items were openly available or on display with most items consisting of trinkets and jewellery like earrings and bracelets. However, as the survey continued a number of locations started to display larger items including statues and carvings. The most numerous items included pendants, necklaces, rings and bangles. Across all the survey months at least 35% (maximum 52%) of shops selling ivory offered bangles, with the maximum number counted (over 2,120 individual bangles) in April 2013 (range 1,077–2,120) (Table 3).

The size of individual bangles varies in regards to the diameter of the bangle and the width and thickness of the ivory. However, many of the bangles observed on the market are a minimum of 10 mm (1 cm) width. Based on this thickness the bangles counted in April 2013 (2,125) would equate to over 2 metres of ivory if stacked side on.

The bangles in the image to the right were taken in a single retail outlet and would, if stacked on top of each other, reach almost 0.25 m in length.

The bangle featured in the image on Page 11 has an internal diameter of 8.125 cm. The ivory is 3 cm thick making the distance across the bangle from one outer edge to another 14.125 cm. This makes the circumference of the bangle 44.37 cm. A bangle of this size could only come from a very large tusk.



TABLE 3 Number of Surveyed Retail Outlets Selling Bangles and Estimated Number of Bangles*

| | Jan 2013 | Feb 2013 | March 2013 | April 2013 | Oct 2013 | Nov 2013 | Dec 2013 | Jan 2014 | Feb 2014 | March 2014 | April 2014 | May 2014 |
|----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| Jatujuk Market | 9 794 | 8 702 | 6 566 | 5 1,230 | 10 480 | 13 1,418 | 15 1,535 | 18 1,643 | 18 1,042 | 19 670 | 19 888 | 20 800 |
| Jatujak Mall | 3 13 | 6 24 | 5 21 | 9 268 | 10 226 | 8 245 | 9 222 | 13 212 | 11 277 | 13 237 | 12 290 | 14 299 |
| River City | 0 0 | 0 0 | 0 0 | 0 0 | 4 46 | 4 18 | 4 16 | 4 16 | 2 14 | 8 26 | 2 14 | 2 15 |
| Amulet Market | 8 304 | 10 399 | 13 810 | 9 607 | 6 293 | 6 88 | 9 363 | 7 115 | 9 301 | 5 259 | 7 279 | 5 251 |
| MBK Center | 0 0 | 4 29 | 2 3 | 2 4 | 7 24 | 7 23 | 8 16 | 7 32 | 7 30 | 8 30 | 8 29 | 8 25 |
| Amarin Plaza | 0 0 | 0 0 | 1 15 | 1 15 | 0 0 | 1 3 | 0 0 | 1 5 | 1 4 | 1 4 | 1 4 | 1 5 |
| Other | 3 32 | 1 30 | 0 0 | 1 1 | 6 8 | 3 5 | 8 57 | 7 50 | 8 92 | 5 42 | 4 41 | 4 9 |
| TOTAL | 23 1,143 | 29 1,184 | 27 1,415 | 27 2,125 | 43 1,077 | 42 1,800 | 53 2,209 | 57 2,073 | 56 1,760 | 59 1,268 | 53 1,545 | 54 1,404 |

* Number of bangles shown in red

December 2013 saw the highest number of individual ivory items on the market recorded (14,512), while the lowest number was recorded at the start of the surveys in January 2013 (5,715) (Table 2). This is close to a three-fold increase in the number of items across a 12-month period, and together with the increase in the number of retail outlets over the same period (61 in January 2013 compared to 105 in December 2013), is strongly indicative of a growing market, without taking into account the level of turnover and sales. While items counted in any one month may have been present in previous months they could also have been new items as sales were restocked.

More than 90% of the retail outlets identified in previous surveys (Martin and Stiles 2001, Stiles 2006-2007, Stiles 2008) were still openly offering ivory products during the initial months of this survey period, with many individual outlets previously noted as having an extensive range of ivory goods for sale still possessing them.

Overall, the latest surveys consistently found more than 8,000 items of ivory openly on display (Table 2) with the seven consecutive months from November 2013 to May 2014 all having counts of more than 10,000 items. A relatively small number of retail outlets with the highest number of items openly on sale consistently accounted for the majority of items recorded. Note that these results do not include an allowance for the many retail outlets that keep much of their ivory stock out of sight, nor do these numbers make allowance for many bags of small beads and other items that were considered too numerous to estimate reliably.

In February 2013, just a month prior to the 16th Meeting of the Conference of the Parties to CITES (CoP16) in Bangkok, more than 9,000 ivory products were found for sale. While there was a slight decrease in March 2013, by December of that year, more than 14,000 ivory items were found openly for sale in a total of 105 retail outlets. This was despite a public commitment made by then Prime Minister Yingluck Shinawatra that Thailand would be shutting down its ivory market. Since then the quantity of ivory openly for sale in the nation's capital has remained consistently high and is increasing.



DISCUSSION

The survey results indicate that, although Thailand hosted CITES CoP16 in March 2013 and committed to shutting down its ivory market, the quantity of ivory openly for sale in the capital's markets remains high and is increasing. In December 2013 (one month before Thailand was due to provide a six month progress report on its CITES Ivory Trade Action Plan to the CITES Secretariat), more than 14,500 ivory items were openly on sale in 105 retail outlets around Bangkok—an increase compared to surveys in March 2013 recording over 8,898 in 63 retail locations. These figures exceed the pre-CoP16 figures observed and indicate no meaningful change in enforcement and commitment post-CoP16.

The results from the current surveys, with regard to both the number of locations and number of items detected, are similar to those from previous work (Martin & Stiles 2001, Stiles 2006–2007, Stiles 2008) with 165 individual retail outlets identified across the duration of the surveys. New retail outlets were identified during every month of the survey while others closed down or changed the type of shop, particularly in the case of locations like the Amulet Market or Jatajuk Weekend Market, where stalls are often rented on short-term or month-to-month leases. In 2001 Martin and Stiles identified 164 individual outlets across Bangkok offering ivory, while in 2006–2007 surveys this number was found to be 151 (Stiles, 2006–2007). In 2008 Stiles found only 63 locations, however, only retail outlets not surveyed in 2006–2007 were included in this work. All of the available surveys report numbers of retail outlets well above those reported by Thailand in its documentation to CITES in 2013, which stated that the number of officially registered locations across the entire country was 67 with only 39 identified in Bangkok. This indicates that many locations are not registered according to existing legal requirements. The locations selling small amounts of ivory appear to sell a limited range of products, focussing on numerous items of the same style and use, stocking items based on the current demand.

As with the number of individual retail outlets, the quantity of ivory, range of products and numbers of items recorded over the duration of the survey indicate a domestic ivory trade that is currently growing. Without accounting for any sales or turnover of items, the estimated quantity of ivory is far higher than could possibly be supplied by the number of domesticated male elephants in Thailand. The quantity of just one specific product, bangles (1,404 in May 2014), observed during the surveys indicates that the amount of ivory entering the market far exceeds that which could be provided by domesticated elephants. In addition the physical size of the individual bangles provides insight into the source of the raw ivory used to produce them. The large-sized bangles with considerable thickness can only have come from pieces of ivory taken from full tusks and not the smaller trimmed pieces that come from domesticated elephants.

The biggest challenge with monitoring and regulating the domestic ivory market in Thailand is inadequate legislation that allows ivory from domesticated elephants to be openly sold with no system to trace the source of individual items or follow the products from source (a domesticated elephant) to retail market outlet. Even though this ivory enters the market legally it is not currently possible to visually tell whether the ivory in retail outlets comes from a domesticated Thai elephant, a wild Asian Elephant or an African Elephant. Sellers can easily claim that the ivory comes from domesticated Thai elephants.



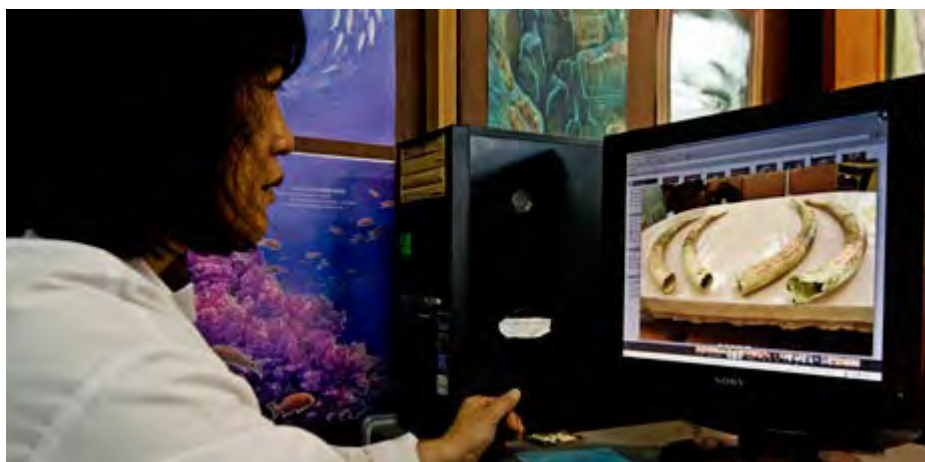
DATE
10/Mar/2014

CERTIFICATION RESULT

**NATURAL RUBY
IN SETTING**

*Tested one piece only
(See comments inside)

Thailand's Department of National Park, Wildlife and Plant Conservation's laboratory is fully equipped to conduct DNA tests on seized ivory.



Unfortunately, aside from DNA testing, it is extremely difficult to confirm whether it is indeed from Asian rather than African Elephants, and even such testing cannot currently distinguish ivory from wild or domesticated animals. Furthermore, DNA testing requires sampling of the ivory and in many cases results in the destruction of small items. Given the lack of a detailed ivory registration and tracking system for individual ivory items it is impossible to determine whether individual ivory items are from currently legal sources.

SOURCES OF RAW IVORY

Thailand began to import raw ivory after the Second World War in parallel with a growth in the internal ivory manufacturing industry. This suggests that the domesticated elephant population at the time was no longer sufficient to satisfy domestic demand for ivory. Since 1990, when the CITES trade ban on African Elephant ivory came into effect, no legal imports of raw ivory have officially occurred to Thailand. Thus, only ivory stocks that were already in Thailand prior to 1990, together with ivory that derives from domesticated elephants would be eligible for ivory processing today.

Domesticated elephants provide legal ivory to craftsmen and vendors in the form of tusk tips or pieces. Large male domesticated elephants in Thailand (tuskers) sometimes have their tusks pruned every few years, but not all of these pieces enter the market and these pieces rarely weigh more than two to three kilogrammes each. Many elephant owners believe it is unlucky to sell full tusks from a dead elephant with many of these being placed into dedicated spirit houses. Domesticated elephants in Thailand are now predominantly used in the tourist industry where large bull elephants with impressive tusks are favoured by tourists, making the regular trimming of tusks unlikely in key tourist areas.

The population of captive elephants in Thailand produces limited volumes of ivory and it is estimated that on average from the current domesticated elephant population approximately 650 kg of ivory pieces could be produced a year. However, this estimate is probably higher than reality as tusks, if cut, are pruned every three to five years but only after an animal reaches the age of 15 years. It is extremely unlikely that local domesticated elephants are capable of supplying a market the scale of Thailand's.

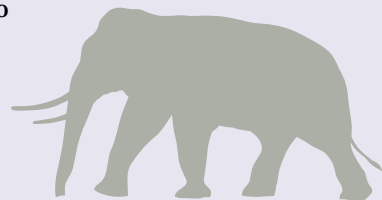
NUMBER OF MALE DOMESTICATED ELEPHANTS IN THAILAND

In 2012 Thailand had 4,169 registered domesticated elephants (males and females), an increase of 153 on the total from 2010 (100 males and 53 females). Just over 30% of the 2012 total were male; an increase of 100 males from the 2010 numbers. By law elephants are required to be registered before eight years of age meaning these 100 individuals were below the age at which tusks are trimmed.

At most there were 1,237 registered male elephants able to provide ivory for the domestic market in 2012. Assuming that all were adults and 20% of this number are tuskless, this leaves only 990 males that can provide ivory to the domestic market. Assuming each of these 990 males are able to yield 40 kg of ivory over their entire lifetime (60 years) this would equate to 650 kg of raw ivory from captive elephants every year.

However, adult bull elephants with trimmed tusks are rarely seen in tourist locations, so the amount of raw ivory entering the market on an annual basis is likely to be much less than this. Even if the pieces trimmed averaged 40 cm (so as not to impact on the nerve area of the tusk) and weigh up to 3 kg this means at most 135 pieces of ivory, with a length of 40 cm can enter the domestic market.

This estimate does not account for the amount of ivory lost during the carving process (estimated by the Elephant Trade Information System to be 30%) and also considers the entire lifetime of the elephant and so assumes tusks from deceased animals also enter the trade. However, in many cases when large bull elephants die their ivory is placed into spirit houses and does not enter the domestic market.



An ivory carver at work in Payuhakirri, Thailand.



IVORY SEIZURES

Thailand's unregulated domestic ivory market is one of the largest in the world and consistently exhibits poor compliance with CITES requirements for internal ivory markets, as determined in *Resolution Conf. 10.10 (Rev. CoP16)*. Law enforcement for ivory trade is almost exclusively directed at the illegal import of ivory into the country with domestic legislation allowing for trade in ivory from domesticated Asian Elephants but no effective internal regulation of this market.

Five ivory seizures were made in 2013 in Thailand and in March 2014 The Royal Thai Customs seized 76 kg of ivory hidden in incoming cargo. Considering that a single tusk from an adult elephant can weigh over 20 kg, without details of the length and weight of the ivory pieces it is difficult to say how many elephants this seizure represents. But assuming an average weight of 5 kg this seizure represents at least 15 tusks or the death of at least eight elephants.

This is just one example of the seizures that take place. Thailand typically makes ivory seizures at the point of importation, which usually involves large consignments of ivory illegally entering the country as cargo. Thailand has made seven of the largest ivory seizures worldwide since 2009, totalling over 9.1 tonnes of ivory, whilst one more, weighing 532kg, was destined for Thailand but was seized at the point of export in Kenya. But law enforcement at the retail market level rarely, if ever, occurs.

Although Thailand has previously indicated that Customs has made 17 ivory seizures since 2008, only 12 cases have been reported to ETIS from 2008 through 2011. Thailand is also often implicated in seizures reported by other countries and the country ranks in the mid-range in terms of the relative number of seizures made. However, considering the weight of seizures made, they are substantial. Overall, Thailand's strategy may prevent some large shipments of ivory from being imported and reaching the retail market, but if raw ivory shipments go undetected at the point of entry, the ivory is seemingly processed and freely marketed with very little intervention once inside the country.



Customs officials in Suvarnabhumi Airport, Thailand discover a shipment of African Elephant tusks from Mozambique. Suvarnabhumi is a major hub for wildlife.



RECOMMENDATIONS

Enforcing existing legislation while amending the law to halt Thailand's ivory trade, reducing demand and increasing enforcement to seize ivory and apprehend the criminals behind this trade, is critical to saving elephants in Thailand and across the globe.

To address this issue TRAFFIC recommends the following:

- Thailand reaffirm its intention to increase efforts to combat the trade in illegal wildlife, especially ivory and other endangered species products through effective implementation of current laws and regulations and improved enforcement of existing national legislation that regulates the sale of ivory through registration of locations trading ivory items and products.
- Reforming and implementing national legislation that effectively implements the country's commitments under CITES and the commitments made at the March 2013 CITES Meeting of the Conference of the Parties in Bangkok to end the domestic trade in ivory.
- Provide urgent formal protection for African Elephants along with other CITES-listed species under Thailand's legislation. Thai law currently implies legislative protection for African Elephants under its CITES commitment, but does not allow for seizures of listed species and their products once they are in the country. Addition of African Elephants and other CITES-listed species to the list of protected species under WARPA would address this issue and make the sale of African ivory on the domestic market illegal.
- If Thailand is going to allow a domestic trade in elephant ivory, the requirements of CITES *Resolution Conf. 10.10 (Rev. CoP16)* must be strictly enforced. There is an urgent need to ensure ivory currently in the market is traceable to legal origin and any ivory that is not should be removed from the market.
- Penalize all sellers who cannot provide up to date registration papers as well as proof of provenance of their ivory according to local regulations, and confiscate the pieces being sold when this can't be provided.
- A comprehensive and accountable registration system for domesticated elephants that includes DNA sampling and confirmation of parentage for new born elephants as well as annual inspections. This would also facilitate tracing of ivory originating from domesticated elephants.
- Properly inventory and in a transparent fashion account for all current stocks of seized ivory. Seizures have been made, but the system of controls over them is not clear. It should be public and independently verified. Future ivory seizures should be clearly logged into this system and their security guaranteed.
- Clearly empower enforcement agencies to seek out, identify and interdict Africa Elephant ivory once it is in the country using forensic techniques that are locally available. Presently, authorities may only interdict ivory at national borders, but their jurisdictional authority is unclear regarding ivory that is already inside Thailand's borders.
- Alter regulations that specify ivory detected at points of entry to the country must be seized immediately, to provide opportunities for local police to use increased enforcement options such as controlled delivery to facilitate investigations to identify and prosecute the criminal syndicates behind the illegal ivory trade.



TRAFFIC, the wildlife trade monitoring network, is the leading non-governmental organization working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

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