

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

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Interpretation and Implementation of the Convention

Trade in Ivory from African Elephants

IVORY TRADE STUDIES

This document has been prepared by the Secretariat.

Resolution Conf. 6.12, adopted at the sixth meeting of the Conference of the Parties (Ottawa, 1987) directed the Secretariat to initiate a survey of the trade in raw and worked ivory within Africa as soon as possible. The Secretariat has since commissioned several studies aimed at providing a better understanding of the ivory trade. The following reports were circulated with Notification to the Parties No. 549 (15 June 1989):

1. A Projection of Ivory Production and its Implications for the Conservation of African Elephants (preliminary results of this research, conducted by Dr. Graeme Caughley, were presented to the first meeting of the African Elephant Working Group in October 1988).
2. The Raw Ivory Trade 1979-1987 (prepared by I.S.C. Parker). A summary of the report, prepared by the author, and comments of the Secretariat are attached as Annex 3 of the present document.
3. The Ivory Trade in Southern Africa (prepared by R.B. Martin). The full report appears as an appendix to the Parker report, listed above, and an abstract prepared by the Secretariat is attached as Annex 2 to the present document.

In addition, the Ivory Unit Co-ordinator and a consultant engaged by the Secretariat, Mr. Thom Friedlein, conducted a joint analysis of the ivory trade in Côte d'Ivoire. The results of this work were presented to the second meeting of the African Elephant Working Group (Gaborone, July 1989). The full report and an abstract are attached as Annex 1 to this document.

Subsequent to the decision of the Parties to call for a study of the ivory trade within Africa, several non-governmental organizations proposed to examine, in addition, the economics of the ivory trade and its impact on elephant populations, and to review the situation in important consumer countries. These studies form the basis for the establishment of the Ivory Trade Review Group (ITRG). As part of its collaboration with the ITRG, the Secretariat made all of the above-mentioned reports available for its consideration.

The studies commissioned by the Secretariat provide useful information on the ivory trade, but it is recognized that they do not adequately cover the breadth of the commerce within Africa. In 1988, the Secretariat drafted project proposals for a review of the trade in Eastern/Southern Africa, and comprehensive studies to be conducted in Cameroon, Central African Republic, Gabon, Congo and Zaire (to follow an initial pilot study in Côte d'Ivoire). Funding for these projects had to come from external sources, as the Parties made no provision for financing of the work called for under Resolution Conf. 6.12. Raising funds in a timely fashion to finance the proposed studies proved to be impossible. Donors whom the Secretariat thought had pledged to support the project decided to contribute instead to work conducted under the auspices of the Ivory Trade Review Group. Nevertheless, it was possible to raise sufficient funds from other sources to conduct a review of the ivory trade in Côte d'Ivoire, mentioned above.

While it would have been desirable to follow up on this pilot study -- having developed an appropriate methodology there for future work -- resources available to the Secretariat did not allow for additional work to be carried out before the meeting of the Conference of the Parties. The Secretariat's programme was also influenced by the fact that the ITRG had already expressed its intention to examine the trade in many of the countries believed to be of particular relevance to the ivory trade. In its report to the second meeting of the African Elephant Working Group (Gaborone, July 1989), the ITRG presented brief sketches of the ivory trade in Nigeria, Cameroon, Gabon, Congo and Zaire. It is hoped that with the additional time and resources available to the ITRG, individuals who participated in the various studies will be in a position to present comprehensive reports to the seventh meeting of the Conference of the Parties.

INTRA-AFRICAN IVORY TRADE STUDY
AN ASSESSMENT OF COTE D'IVOIRE'S IVORY TRADE

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(In partial fulfilment of Resolution Conf. 6.12)

Abstract

The primary aim of the study was to document the nature of Côte d'Ivoire's ivory trade and, to the extent possible, to quantify trade volumes and domestic consumption. Distinct forms of retail and manufacturing outlets in the Abidjan area were identified: 8 specialty stores, offering high quality carvings in ivory and other materials; 9 hotel/gift shops, carrying small to negligible quantities of ivory; 4 market areas, with a total of about 50 stalls selling ivory carvings and accessories of varying quality; and 12 workshops situated in a poorer suburb, all of which displayed ivory for sale.

A systematic evaluation of the raw material required to produce the worked ivory displayed produced a global estimate of 5,000 kg of raw material input. To allow for worked ivory stocks not on view, not located or visited in the rest of CI, this figure may be increased by 50 percent, to 7,500 kg. All ivory on sale appeared to be from forest elephants.

Through discussion and observation, retail sales and workshop production seem to reflect an industry in decline. Turnover in retail shops was slow, as tourists apparently are deterred by high prices and apprehension of import controls. By rough calculation, it was estimated that commercial stock turned over only once in two years, giving an annual consumption figure of 3,750 kg. Infrequent sales of highly-priced items seemed to keep the stores viable.

Workshop owners, many of whom were said to be immigrants from Guinea, lamented the unavailability of raw material. In many workshops, the majority of the craftsmen worked on hardwoods rather than ivory, despite the difficulty in carving wood, and its comparatively low retail value. The source of supply of the raw ivory (actually, partially processed) was often stated as C.A.R., which agrees with information from CITES permits. Some goods were imported officially or otherwise in finished form from Zaire.

Selling prices at the workshops ranged from \$US 200-300 per kg of raw material content. In contrast, prices in the street markets were variable and quite negotiable. The operators appeared to be nomadic traders, likely from Senegal.

There were unconfirmed reports of senior public figures holding considerable stocks of raw ivory, some of which are supplied to sculptors commissioned to produce special works. Other reports suggested smaller stocks belonging to privileged citizens, but these could not be quantified.

Customs statistics for 1976-1988 reveal average imports of raw ivory of 24 tonnes per annum, peaking in 1980 at 57 tonnes and falling to the present level of about 15 tonnes per year. Zaire has been and continues to be the dominant supplier. The declared value of this ivory (i.e., US\$ 3-10 per kg) is considerably below the world market price, of which the authorities appeared unaware. Worked ivory imports for 1988 are conservatively estimated from a combination of sources at 3,300 kg, a significant increase over previous years. However, Customs statistics for those years may underestimate true volumes. (N.B. The term 'worked' may actually refer to and include partially processed raw ivory.) Reported exports of raw and worked ivory between 1978 and 1988 are insignificant relative to imports.

Control procedures at the principal entry point, the international airport, were strengthened in early 1989, and should prevent abuses of the system which may have occurred in the past. Close regulation of the domestic carving industry is still lacking.

Despite the increase in worked ivory imports in 1988, the overall impression is that of a declining industry, with workshops experiencing difficulty in obtaining supplies, and increasingly being "squeezed" by the tougher import control regulations. Retailers are not suffering for lack of supply, but rather due to poor demand for finished products. This apparent decline is not, however, reflected in the import statistics for raw ivory, which suggest that a considerable volume of ivory is imported and remains within the country. Since this does not appear, for the most part, to have been transformed into manufactured goods, one can speculate as to the size of the stocks that might be held by privileged individuals. (It is possible though that some ivory recorded as 'imported' may actually only have transitted CI.) Regardless, the extent of exports from Zaire, not recorded in its statistics, and the continued supply of partly-processed ivory from C.A.R. are noteworthy.

Introduction

As part of the present project to attempt to assess the overall volume of ivory traded or consumed within Africa, and as a pilot study to develop methods of investigation for the project in West and Central Africa, a mission was conducted in Côte d'Ivoire (CI) over a two-week period during late April - early May 1989.

Not only the name of the country, but many other factors imply a strong connection with the ivory trade. The safe anchorages afforded by lagoons along the coast enabled European merchants to establish trading posts at the turn of the 19th century, and much ivory from West Africa was exported at that time. As the slave trade was gradually abolished, by 1850 traders looked further South and to East Africa for substantial supplies of elephant tusks. Ivory from West Africa ceased to be of major significance.

Today all elephant populations in West Africa are estimated to be too small to support commercial exploitation for their ivory, and thus the existence of any thriving ivory trade in the region would be cause for concern. Some information had suggested an ivory industry in CI, but few details were known.

Abidjan, the capital city, has thriving modern business areas, smart tourist hotels and residential suburbs, alongside almost shanty town areas. Apart from the historical connection, there is much local evidence of a special 'affinity' for elephants and ivory, which is reflected in the architecture of some buildings, and in the names and logos used by many shops and businesses.

CI has a relatively strong economy, with its own oil deposits (including export potential), and agricultural exports, of which cocoa is very important. The currency is the C.F.A. franc which has a fixed exchange rate against the French franc, thus giving it harder currency status than many African monetary units. The international airport handles the largest jets, and has frequent travel contacts within and outside Africa. There are numerous embassies and consulates in Abidjan, and the country appears to enjoy political stability, while hosting substantial numbers of immigrant residents.

Methodology

The study was conducted by Thom Friedlein, who has over 20 years practical experience in the ivory trade, and Doug Hykle, the CITES Secretariat Ivory Unit Co-ordinator. A two-tiered approach was adopted to make the necessary inquiries, with Friedlein posing as a prospective buyer of ivory, and Hykle acting, for the most part, in an official capacity.

Prior to the visit, data on CI worked ivory imports from the Central African Republic were compiled on the basis of permits on file at the CITES Secretariat. This provided a list of names of about 20 importers, and gave a basic idea of the nature of the trade in worked ivory that had been conducted during the first half of 1988. A small number of CITES permits for raw ivory imports and re-exports was also available, and relevant background reports on CI were consulted. Côte d'Ivoire customs statistics for imports and exports of raw ivory between 1978 and 1985 (i.e., volumes and declared values) were made available by the Wildlife Trade Monitoring Unit (WTMU).

Apart from this, very little information was available in advance, which made the initial research somewhat painstaking. Since precise locations of ivory retailers and manufacturers were not known prior to arrival (Friedlein preceded Hykle), it was necessary to begin by making an initial tour of Abidjan, by employing a taxi driver/guide. This helped to locate several of the main retail outlets (e.g., specialty stores, hotel gift shops etc.), as well as the district where most of the workshops are situated. Additional retail outlets and workshops were discovered in the days that followed through systematic tours (on foot) of the principal shopping districts of Abidjan, and on the basis of information provided by the Ministère des Eaux et Forêts (MEF).

For each retail outlet visited, an assessment was made of the volume of raw material required to produce the carvings and objects displayed. A crude formula was developed (based on cylindrical volumes, and the density of ivory) to estimate the weight of raw ivory used in the manufacture of individual pieces. An estimate could then be made for an entire display by summing the component parts.

This procedure was carried out for each outlet, by both researchers where possible, either separately or together. The latter approach had the advantage of allowing one person to question the sales clerk/owner while the other evaluated the display, and then to reverse roles. (Personnel were questioned on such areas as prices, ivory sources, suppliers, turnover, etc.)

The initial estimates for individual outlets were compared and the technique refined over the first few days. The independent estimates correlated quite closely in most cases (often within 10 percent). Where significant differences were noted, it was possible to return to the outlet to investigate the discrepancy.

Friedlein undertook a similar approach for the workshops (many of which also had displays) but, in addition, used the pretext of being an interested buyer of raw ivory from England to attempt to probe more deeply into other areas, such as sources, prices and availability of raw material; the number of artisans; feasibility of commercial exports etc. Return visits were made over several days in an attempt to win the confidence of the owners, and to get them to reveal as much information as possible. Hykle visited the same workshops and some new ones, in an official capacity, a few days later to make comparisons.

Hykle had meetings with MEF officials at their headquarters and with Customs authorities (at the airport and in the statistical division) over several days, and informal discussions were held with MEF agents stationed at the international airport. The topics discussed included existing control mechanisms for raw and worked ivory, past import/export trends, the valuation of ivory for taxation purposes etc. A complete set of import and export statistics for raw and worked ivory for the years 1980 to 1988 (November) was provided. Additional information was obtained from the Ministry of Tourism.

The main business and government district of Abidjan is named Plateau, the higher class residential and tourist area, Cocody, and the poorer suburbs lying towards the airport are Treichville, Marcory and Koumassi. The latter have a high population density and feature many small shops and workshops, houses and street markets haphazardly connected by numbered streets and cross streets.

Apart from a visit to a large craft market on the coastal road near Grand Bassam, about 45 km east of Abidjan, no visits were made outside of the city, as it was not deemed to be cost-effective in the limited time available. This option might have been explored had there been concrete information to suggest that further travel to the interior might prove worthwhile.

Results

1. Points of Sale, Locations of Ivory

The ivory trade in CI is of a complex nature. Where we have attempted to distinguish between the different strata of sales outlets and distinct levels of trade, these can in some cases overlap.

A. The Specialist Store:

Mainly in Abidjan (Plateau) there are a number of high class shops offering good quality carvings, jewellery and ornaments in ivory as well as exotic hardwoods and semi-precious stone, especially malachite. Prices are quite high, often in excess of US\$ 600/kg in terms of raw material content. Some of these stores claimed to have their own workshops, and to employ their own artisans to produce stock, although this was not readily apparent.

The goods displayed are generally of very high quality, representing some of the best work produced in the country, and it seems most likely that these stores obtain their supplies selectively from the workshops elsewhere. Being consistent buyers, they are probably able to secure stocks at preferential prices, perhaps taking advantage of a workshop owner or individual craftsman in desperate need of cash. The sales staff in these locations were almost universally of European extraction.

On questioning, they stated that business gifts form an important part of their sales. Although the practice was much more common in the past, some local or international companies still present ivory as gifts to retiring employees and visiting dignitaries. In addition, these stores serve the upscale tourist and souvenir market.

Turnover in these shops seemed very slow, however. Potential buyers appear to be discouraged by the relatively high prices for all but the smallest of items. One staff member in a shop with a substantial display claimed that visits from individual tourists were infrequent, and actual sales of carvings (as opposed to ordinary and less expensive necklaces and bracelets) were rare. (This claim was substantiated during the course of an hour long discussion in the shop. Despite bustling activity on the street outside, only two customers entered, but showed only limited interest. The clerk was able to recall specific instances when there actually had been "successful" sales in previous months, suggesting that they were not commonplace.)

As infrequent as they are, it would appear that the rare sale of an expensive object helps to maintain the viability of these shops. There was a suggestion that highly-priced objects might be replaced only if a sale were effected, although one shop owner was reputed to hold at her residence as much stock again as was on display.

Visits were made to 8 shops of this nature, and the ivory on display was assessed at 1,500 kg of original raw material.

B. The Gift Shop:

This is the least complex form of commerce. Mixed shops selling handicrafts, books, cosmetics, etc. are found in all hotels and are serviced by the local importing and carving industry. Stocks are small to negligible, and would again be replaced only if sold; and in some cases would be on a 'sale or return' basis. Mostly the items displayed are smaller, cheaper items and jewellery.

Visits were made to 9 gift shops, and the ivory was assessed at 200 kg of raw material. However, one shop, included here, displayed only Oriental carving, and it is thought that the finished products were imported from Hong Kong as long ago as 1984.

C. The Workshops:

All those visited were situated in Koumassi and Treichville, and varied in sophistication, the most modern having an imported power saw and lathe, the majority however having flexible-drive electric drills as the only mechanization. The buildings are mainly terraced shopfronts, with workshop area and yard adjoining, where rougher work could be done. A few workshops worked exclusively in ivory, but most also carved in hardwoods. All had display cabinets for their finished products.

The owners of these 'factories' were said in many cases to be immigrants from Guinea and perhaps other neighbouring countries. A group of three in Koumassi had been established for 8-10 years, whereas some others had reputedly moved into the city suburbs only a few years previously (c. 1985), as a result of having been closed down in their previous location, Gagnoa, in the interior of CI by the authorities, under the allegation of working with illegal or poached ivory.

Questioned officially and unofficially regarding sources of supply of raw material, workshops admitted importing from C.A.R. in particular, raw material being shipped as 'worked' ivory. Evidence from documentation confirms this, although in many cases the working appears to consist of preparing tusk ivory into small blocks. Research into telephone numbers given, post boxes used, and similar names of operators gives evidence of groups of workshops operating as co-operatives, buying material together, although this was not confirmed in interview.

Another source of supply, particularly for the upscale workshops, is from certain privileged clients who supply raw ivory to be carved on commission. Some workshops appeared to function almost entirely on this type of trade, although producing sufficiently high quality work, they would also have the opportunity to service the specialist shops.

The sales from the workshops include the passing trade, from the intrepid tourist who would seek them out, the standard gift shops, and the street markets. Evident from inspection of the stock displayed is that not all ivory is produced to the same degree of quality, and it is certain that some goods are imported officially or otherwise from Zaire, in finished form. Apart from the discrepancy in the quality of work, many factories displayed artefacts in malachite and ivory, which are without doubt from Zaire.

As with other points of sale, a feeling of declining trade in ivory was evident at many of the workshops. Wood (ebony, in particular) was the primary raw material being processed in the majority of the factories. It was not unusual to see 8-10 individuals at a given location involved in the various stages of production. Wood, however, was said to be more difficult to carve, taking perhaps twice the length of time to reach an end product, making it an unacceptable substitute for ivory. Moreover, in one test case, an ebony carved head was priced at one-twentieth of the equivalent sized ivory head.

Twelve workshops were visited with an estimated aggregate of 1,600 kg at selling prices of US\$ 200-300 per kg raw material input.

D. The Street Market:

CI has many local markets, and a number were located selling ivory, both in and outside Abidjan. The stalls with ivory also sold other products, and the vendors were particularly persistent to sell anything, apparently at any price. Whereas in the workshops, there was evidence of a costing procedure, whereby goods were priced depending on raw material content and quality and intricacy of carving, it was impossible to establish a genuine selling price in the street markets. In some cases, a 'first price' could be lowered by 75 percent during negotiation. Selling and cash flow is the function of these stalls, and there was no structure of cost, overheads and profit margins in their dealing.

The operators in the markets are nomadic traders, and comment suggested many are Senegalese, with a tradition of such activity. Much of the material on display appeared to be from Zaire, again much malachite being in evidence. The objects were mainly quite small, and usually more primitive than goods produced in the CI workshops. Some market goods were, however, of better quality and apparently identical to the workshop product, and likely originated from that source.

It is very possible that, until recently, some of this finished ivory may have been smuggled from Zaire by traders in suitcases, although import control procedures at the airport have now been made more strict. The source of the market ivory is therefore partly local manufacture, and partly imported in finished form. In view of the incredible persistence of the vendors, it is very likely that tourists would feel obliged to buy something from them, if they dared to wander through the market stalls.

As a pedestrian in town, one may also be pursued by individual street vendors offering woodcraft, malachite, gold and ivory. It was established that these travelling salesmen in fact belong to or operate market stalls, and their operation of the hard-sell technique is not distinct from the market stalls.

The markets visited varied in level of activity, quality and style. Abidjan (Plateau) has two outdoor market areas, with relatively poor quality merchandise, while that of Abidjan (Cocody) was much more sophisticated, including lock-up shops and window displays. Grand Bassam's craft market (with stalls on both sides of the main road, stretched over a distance of over 500m) was rather sleepy, with mixed goods, evidently designed for tourists to browse.

In all, some 50 market stalls were found to display ivory in these various markets, out of perhaps five times as many that were inspected. Some were quite specialized, while others sold ivory merely as a sideline. The total quantity of ivory seen was assessed at 1,600 kg raw material content.

E. The Private Investor:

During the course of the study, comments were heard regarding senior public figures in CI having an affection for ivory and giving commissions to sculptors to produce special work for their private collections. These individuals would often supply the raw material for such commissions, and it is assumed it would not be unusual in African diplomatic circles for gifts of ivory in tusk form to be made to highly respected visitors. There were unconfirmed reports of fabulous collections of ivory belonging to some privileged citizens, those collections presumably also containing examples of 'trophy tusks'.

In addition to this factor, there was evidence of some ivory store owners having close high level political connections, and other substantial business interests in francophone Africa. Therefore it is reasonable to speculate that ivory might be obtained, as a raw material, or in worked form, as a barter commodity from other territories. Thus the currency element is excluded from the transaction. However, if such ivory were obtained, possibly illicitly (e.g., from Zaire), the real cost to the trader would be at a fraction of the world market price, and the sale of a few items would effectively cover the capital investment. Thus the trader would be under no constraint to dispose of remaining stocks for cash flow purposes, and indeed, raw or worked ivory obtained and held in these circumstances might be treated by the entrepreneur as a longer term investment.

Despite evidence to support the existence of such stocks, it was practically and diplomatically impossible for the current mission to obtain hard data in this area. It is believed, however, that they could be very substantial, perhaps in the order of 10-20 tonnes, in total. There were also unconfirmed reports of smaller stocks owned by private individuals outside of Abidjan. They could not be quantified precisely, but might be in the order of 500-1,000 kg each.

F. Other:

Given certain budget and transport constraints, it was not considered viable to visit any distant outlying districts. The development of the new capital city of Yamoussoukro in the interior, the beach resorts at Assinié some 80 km east of Abidjan, location of Club Med. and a similar Italian-oriented complex, and the tourist town of San Pedro towards the western coastal frontier with Liberia would undoubtedly reveal more worked ivory. It is doubtful, however, that it would have been cost-effective to investigate these areas, as Abidjan is the logical funnel for all trade.

Certain estimates have to be made in this report to take in assumed additional stocks in those areas which were not surveyed, the likelihood that some points of sale and workshops in Abidjan were overlooked, and the stocks 'behind the scenes' of the shops, workshops and markets which are in fact intended for sale in the foreseeable future.

It is impossible to estimate or quantify those items held privately as described above, which fall outside the norms of commerce. Table 1 summarizes the findings reported above.

Table 1. Worked ivory on display, Abidjan district: April 1989

Establishment Type	No.	Raw material content (kg)
Hotel/Gift Shops	9	200
Market stalls (Plateau)	15-20	250
Market stalls (Cocody)	12	1,000
Market stalls (Gd. Bassam)	25	350
Stores	8	1,480
Workshops	12	1,600
Total viewed		4,880

2. Statistical Overview

Figure 1 shows Côte d'Ivoire imports of raw ivory between 1976 and 1988, on the basis of published CI Customs statistics. (The value for 1988 is an extrapolation, based on 10 months data.) Imports over the 13 year period averaged 24.2 tonnes per annum, with a peak in 1980 of 57.3 tonnes. After having fallen to a low of 12.5 tonnes in 1985, imports have since risen slightly to about 15 tonnes per annum.

Where country of origin data are available, Zaire clearly has been the dominant supplier of raw ivory since 1981 (Table 2). Customs statistics indicate that, over the eight year period, some 123 tonnes were imported from that country, an average of over 15 tonnes per annum. This figure may be underestimate since some of the ivory of "various" origin recorded in CI import statistics might also be attributed to Zaire. Other suppliers of some significance in the past include Congo and C.A.R. More recently, imports from Gabon figure in the statistics.

Table 2 shows the declared value of the raw ivory imported, on a per kg basis, after conversion from C.F.A. franc to US\$. The most striking aspect of this calculation is the extent to which the declared value undercuts the world market price for raw ivory. Between 1984 and 1987, the average declared value ranged from just US\$ 3.33/kg to 6.02/kg, vastly below the price of ivory prevailing in those years.

Table 3 shows Côte d'Ivoire imports of worked ivory between 1980 and 1988, on the basis of published CI Customs statistics. The data suggest a marked reduction of worked ivory imports since 1982, with the exception of 1988. (The value for 1988 is below what is estimated on the basis of other information sources, namely a collection of C.A.R. export permits on file at the CITES Secretariat and data on actual imports compiled by the MEF. Combined, these two sources suggest that worked ivory imports in 1988 totalled 3,272 kg, mainly from C.A.R., Zaire and Congo. Even this figure

Figure 1. Imports of raw ivory by Côte d'Ivoire (1976-1988)

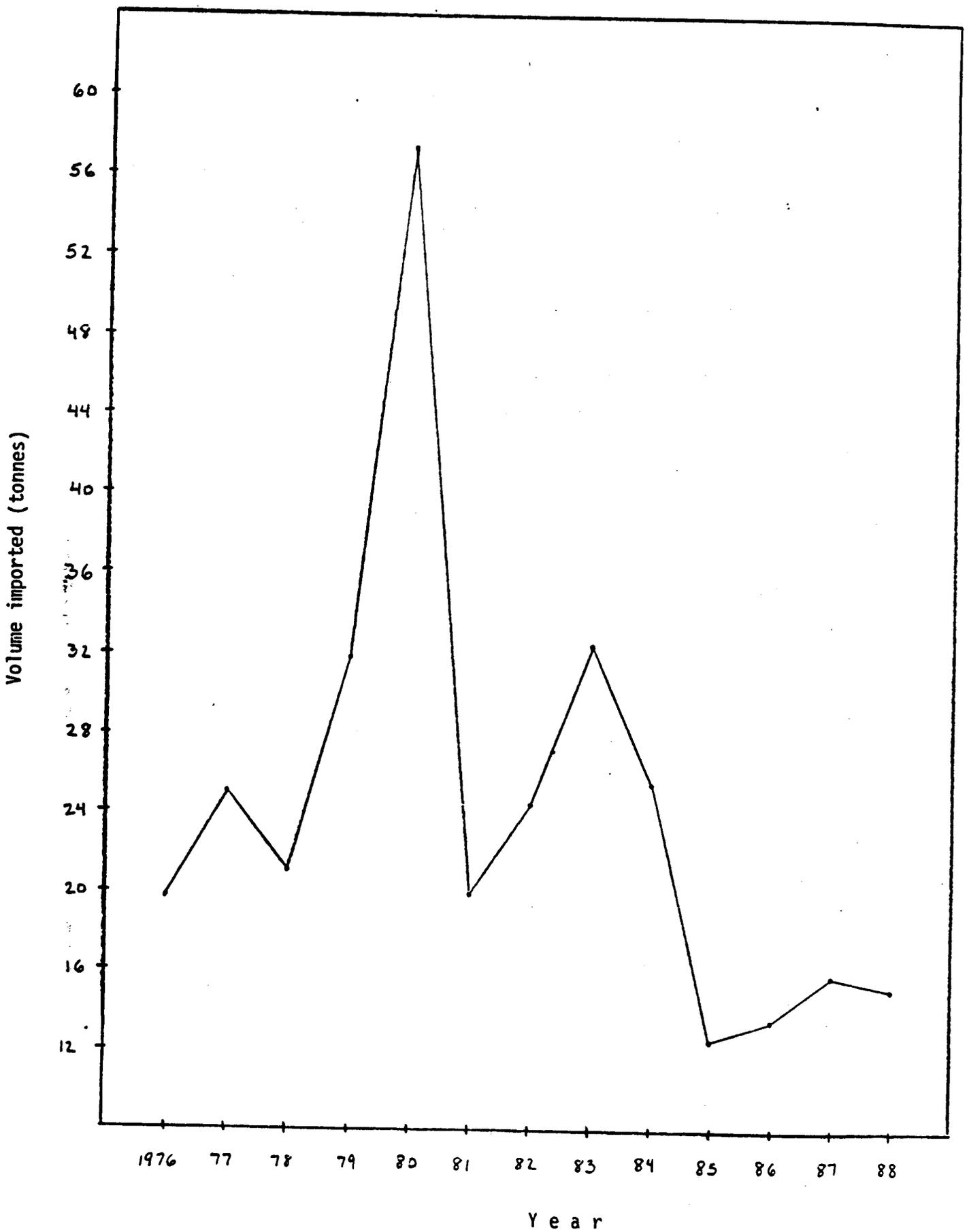


Table 2.

CI imports of raw ivory (1976-1988)

Year	Weight (kg)	Origin (if stated)	Declared value US\$/kg
1976	19,873	-	-
1977	25,067	-	-
1978	21,036	-	-
1979	21,975	CG	
	6,873	CM	
	1,764	ZR	
	1,257	GB	
	78	CF	
(Total)	(31,947)		(5.34)*
1980	27,850	CG	20.65
	29,481	-	7.10
(Total)	(57,331)		(13.69)
1981	11,665	ZR	10.84
	8,316	-	10.42
Total)	(19,981)		(10.66)
1982	15,187	ZR	9.36
	4,101	CF	7.88
	4,882	CG	5.67
	181	CM	10.41
	84	GB	10.68
(Total)	(24,435)		(8.39)
1983	29,910	ZR	8.45
	1,908	CG	7.54
	273	CF	9.39
	247	GA	9.36
	217	GB	6.77
(Total)	(32,555)		(8.40)
1984	21,816	ZR	4.76
	3,571	-	5.84
(Total)	(25,387)		(4.91)
1985	10,983	ZR	2.97
	755	CG	4.02
	762	GA	7.75
(Total)	(12,500)		(3.33)
1986	13,151	ZR	5.63
	260	GA	9.92
	214	JP	4.47
(Total)	(13,625)		(5.69)
1987	11,362	ZR	5.81
	4,474	-	6.55
(Total)	(15,836)		(6.02)

1988	7,470	ZR	6.01
1,059	GA	69.73	
4,018	-	7.30	
(Total)	(12,547)		(11.80)

Notes: The data for 1976-1979 were extracted from a report prepared by Pierre Hunkeler in May 1982, on file at the CITES Secretariat, and are based on statistics provided at the time by the Ministère des Eaux et Forêts. Customs data are also available for 1979, and show total raw ivory imports of 29,285 kg with an average declared value of US\$ 5.34/kg. The remaining data are taken from CI Customs statistics for the years 1980-1988. The 1988 figures are for the first ten months only.

Conversion rates used for US\$ / C.F.A. franc (from Parker, 1989):

1979: 212.63; 1980: 210.97; 1981: 270.20; 1982: 326.80; 1983: 379.22;
1984: 435.54; 1985: 445.63; 1986: 346.30; 1987: 300.54; 1988: 300 (est.)

Table 3.

CI imports of worked ivory (1980-1988)

Year	Weight (kg)	Main origin	Declared value US\$/kg
1980	1,494	-	23.36
1981	2,169	-	11.07
1982	2,120	CG, CF, ZR	10.63
1983	784	IT, HK, CN	14.10
1984	432	-	8.67
1985	783	CG, CF, HK	8.52
1986	228	CF, ZR	10.87
1987	38	-	8.26
1988	981 *	-	8.28

Source: CI Customs statistics

* Reported imports for first 10 months of 1988 only.

is likely to underestimate total imports for the year.). Once again, the declared valued of the worked ivory imported is well below the world market price, averaging about US\$ 8.90 over the last five years.

Table 4 shows Côte d'Ivoire exports of raw and worked ivory between 1978 and 1988, on the basis of published CI Customs statistics. The values suggest that exports of ivory in both raw and worked form are insignificant, relative to recorded imports. In the first 10 months of 1988, recorded exports totalled less than one tonne.

3. Control Systems

Although Côte d'Ivoire is not yet a Party to CITES, it has nevertheless agreed to implement the provisions of the Ivory Trade Control System since 1986. The Ministère des Eaux et Forêts (MEF), assisted by the Customs service, is charged with this responsibility. MEF agents are stationed at the international airport, which is believed to be the entry point for most ivory shipments. The clearance procedures at the airport have been overhauled recently, and should prevent abuses that may have occurred in the past. Whereas under the former system, goods were cleared by

Table 4.

CI exports of raw and worked ivory (1978-1988)

Year	Weight raw ivory (kg)	Weight worked ivory (kg)
1978	397	-
1979	2,408 *	-
1980	964 *	147
1981	443	136
1982	228	34
1983	98	100
1984	0	432
1985	45	43
1986	35	311
1987	130	0
1988	894 **	86 **

Source: CI Customs export statistics, except for *. Data for 1979-1980 were extracted from a report prepared by Pierre Hunkeler in May 1982, on file at the CITES Secretariat, and are based on statistics provided by the Ministère des Eaux et Forêts. Customs statistics for the same two year period show exports of raw ivory of only 446 kg and 397 kg, respectively.

** Reported exports for first 10 months of 1988 only

individual Customs officers, a new computerized system is now operational. The difference is that when goods are presented for clearance, the relevant details must already have been entered in the computer, and the description must tally when the goods are physically inspected. (All shipments presented for clearance are inspected, which should minimize the possibility of misdeclared ivory escaping detection.)

Sources report that, in the past, it was not uncommon for goods of dubious legality to be cleared by Customs officers with the help of a small bribe. The present system is expected to make this practice much more difficult, if not impossible. It was suggested that the Customs warehouse where consignments are held pending clearance is well above normal capacity because people are reluctant to come forward to clear goods which arrived shortly after the new system became operational.

Apparently, there were problems in the past with individuals bringing in small consignments of ivory as part of their hand luggage. This practice might now be detected by the use of an X-ray scanner, through which incoming luggage is passed upon arrival. (The effectiveness of this procedure may be questioned, however, since neither the baggage of Hykle nor Friedlein was subjected to any inspection.)

Under the present Customs regulations, raw ivory (classified under the 05-09 tariff category) is assessed a 27 percent fiscal duty (droit fiscal), and 25 percent VAT, on top of that. Effectively, therefore, raw ivory is assessed at 58.75 percent. Worked ivory (classified under the 95-05-10 tariff category) is assessed a 27 percent fiscal duty, 5 percent Customs duty (droit de douane) and 25 percent VAT, on top of that. Effectively then, worked ivory is assessed at 90 percent. All monies raised go to the public treasury.

For purposes of valuation, raw ivory is assessed at C.F.A. 3,000 per kg (about US\$ 10/kg at the current rate of exchange) or higher, depending on the declared value. In other words, if raw ivory is declared at under C.F.A. 3,000 per kg, Customs will automatically assess it at the higher value. Similarly, worked ivory is assessed at C.F.A. 4,000 per kg (about US\$ 13/kg at the current rate of exchange) or higher. In either case, the assessment is far below the world market price for ivory. When this discrepancy was raised with various authorities, all appeared genuinely surprised and unaware of the real value of ivory.

According to the MEF, tusks of less than 5 kg cannot be imported, under the terms of a recent regulation. If tusks of such weight are presented for clearance, a fine is levied and the ivory must either be re-exported or subject to confiscation. Apparently, this eventuality has not yet occurred.

Discussion

1. General

The overall impression of the ivory business in CI is that of a long-term affinity for, and tradition of selling and carving the material. Carving is certainly a basic craft of the region, and artisans were keen to insist that CI had the best carvers, be it of ivory or wood. Certain sources of supply of raw material are legitimate, but it must be assumed that other ivory arrives on the market without having been subject to proper control procedures. Discussion with the authorities would imply that this should lessen or cease with measures presently being taken.

Many of the individuals involved in the business, with the exception possibly of the market traders, have some awareness of wildlife conservation and regulations that exist to control the movement of ivory products. Their knowledge of specific control procedures is still scanty however, perhaps because CI is not yet a Party to CITES.

Most traders appeared to have a long-term involvement with ivory, workshops having been passed down through families, others having experience in trading ivory in C.A.R. for some ten years previous. However, it was stated by many traders and retailers, and confirmed by observation, that the ivory business was slack. Many emphasized that the industry was, in fact, in decline. The reasons for this are not totally apparent. Certain facts are available, but certain assumptions may also be made.

As a good part of the market for ivory sold in CI is aimed at tourists, it is not surprising that there has been a decrease in trade. The figures for vacation tourism have declined since their peak in the early 1980's. French, Italians and Americans make up the largest segment of visitors from the West. Despite a warm climate, CI has only limited comfort for Western visitors, and that mainly in the seclusion of modern hotels or beach complexes. Prices of most consumer goods are by no means cheap, and there were constant warnings of possible security problems, which could also act as a deterrent. Unless quite wealthy, most tourists will not have great amount of spare spending money after normal subsistence, at hotel prices. Ivory is not cheap, despite its availability at perhaps below world market prices, and cannot be considered in the category of normal tourist souvenirs.

It is also clear that the government and media campaigns in America and Europe have made members of the public aware of the possible moral dilemma of buying ivory at all and, if this is no deterrent, the additional question of legality of bringing wildlife products through domestic customs services, unless accompanied by CITES documents, may be.

2. Pricing/Valuation

Some comment on the financial structure of the CI trade is necessary. Import statistics themselves give little knowledge of the real cost of raw or worked material to the importers. Elsewhere it has been explained that substantial local import duties are payable on raw or worked ivory, and that the assumed value, where no documentation existed, in the way of a commercial invoice to evidence price, has been at an artificially low figure for many years.

It has been stated that the traders have a negotiating mentality, and therefore also that marked prices were not necessarily a good guide to real selling prices. By careful questioning of sales staff in stores, it was established that an artisan, if requiring cash, would be prepared to accept as low as one third of the normal factory working price. As the official factory selling prices were between 200 and 300 US\$/kg, it is calculated that US\$ 100 per kg could therefore see the workshop operator breaking even, after paying his import duty and freight costs, plus his workers and other expenses. It must mean therefore that the base price at which the artisans are purchasing their ivory is substantially below the average prices that applied in 1988, and even more dramatically below those of 1989.

3. Sources of Ivory/Implications

The sources of partly-worked and worked material from elsewhere in Africa are evidently easier to manage by the African trader and, incidentally, significantly cheaper than raw ivory being exported from those same sources under CITES procedures. Therefore there must be some doubt as to the sources of those supplies in their own countries of origin. The evidence of customs statistics, statements of traders, and examination of ivory all confirm that goods on sale in CI are from forest elephants, and where identification was possible no savannah elephant ivory types were seen. The predominance of Zaire as a supplier of raw ivory in customs figures is disturbing, since matching records do not exist in the CITES export data from Zaire. However, it is conceivable that some of those substantial tonnages received from Zaire were of processed, as opposed to raw, ivory.

There was almost total denial amongst the traders of any ivory being obtained from local sources, and there was awareness that the elephant was protected locally.

It is interesting to note that although there are about 40 export C.A.R. permits for worked ivory on file at the CITES Secretariat, MEF agents had only a few of them (received from customs brokers). It is possible that some traders obtained legitimate CITES permits from C.A.R., but never presented them to customs when the ivory was brought into CI. They may have chosen instead to conceal the ivory in order to avoid having to pay customs duties. If the ivory were ever detected, the importer would still be in a position to present a valid CITES permit.

4. Volume of Trade

An attempt to assess manufacturing potential by taking the number of artisans employed working ivory and an assumed annual productivity level would be misleading at best. The informal nature of most of the workshops renders the calculation of workers difficult, and those artisans might be working on ivory for only a fraction of their time. An alternative calculation has been made, based on observation and questioning. Visible ivory amounted to some five tonnes of original raw material. This figure has been increased by 50% to allow for worked ivory stocks not on view, and worked ivory in other locations which was not found or visited.

Each point of sale is taken as selling one percent of its stock per week, or put otherwise, commercial stock is turned round once in two years. We have noted that ivory sales were observed to be slow. From knowledge of customs statistics, the oriental carving in Abidjan apparently was imported five years previous. Some better carvings in stores were signed and dated by the artist, and it was not uncommon to find items dated 1986 or earlier. The calculation for actual consumption over two years is thus $5,000 + 2,500 = 7,500$ (i.e., 3,750 kg per annum). Although we are relatively confident that this estimate is not excessive, the potential margin of error associated with it should be noted. If, in fact, the turnover were two percent per week, the annual consumption would be double, i.e., 7,500 kg.

Although imports of ivory are seen to have declined in recent years, there is a substantial discrepancy between this consumption figure and recorded imports. Subject to verification, some recorded 'imports' might actually have been shipments in transit, utilizing the transport, commercial and financial infrastructure of CI for reasons of efficiency -- or perhaps staying in CI only briefly before moving to neighbouring countries. Some further study is needed to establish volume of ivory passing through CI in this way, as locally available data failed to answer this question.

Even taking into account a margin for error, there remains a substantial gap between current import and consumption levels, and it is concluded that substantial quantities of ivory remain in CI, outside normal commercial stocks. We have already explained, although only through unconfirmed reports, that such stockpiles might exist in the hands of general entrepreneurs and/or privileged 'amateurs'.

The Secretariat has been approached by a trader from CI who has an interest in commercializing stocks of raw ivory alleged to exist in CI, and it seems likely that these quantities result from some of the accumulations surmised above. Regrettably it was not possible either through that trader, or through Ministry officials to be shown such stocks, but a quota submission from CI might reveal the extent to which goods have accumulated over the last decade.

Conclusion

The foregoing gives some overall impression of the visible ivory trade in Abidjan and surrounding area.

Evidently there remain questions to be answered regarding the legitimacy of supplies and existence of stockpiles. The overwhelming impression of the day to day business however is that of small businessman carrying on their traditional craft, unaware perhaps of the threat to elephant populations, and only recently becoming conscious that the future of their business may be in

jeopardy. The traders do not appear to have gone out of their way to seek information about relevant export regulations, nor to comply with them, but no evidence was found of an organized conduit for illegal ivory, either raw or worked. The recent strengthening of control systems should serve to eliminate serious abuses. The existing informal business structure would, in any case, appear to be on the decline, and further constraints along the lines of regulating the carving industry will likely inhibit most future activity.

Whether the traders would be able to adapt to such a new scenario is rather doubtful. The requirement to properly document all raw material acquisition and imports and to maintain adequate stock records would be beyond most. Perhaps more significant however would be the purchase of raw material at full world market prices, and payment of duties and taxes thereon. Given the present absence of optimism among the traders, it is conceivable that most, if not all, would be unwilling or unable to remain in business.

ANNEX

Comments on Methodology

Despite the relatively modern and sophisticated nature of CI, being without advance information was a problem in conducting the survey in the most efficient manner possible. Initially, time was expended in laborious 'legwork' which could have been avoided with advance local knowledge.

Similarly, due to an apparent lack of close co-ordination with the Customs service, the local Ministry was not in a position to provide instantaneous data on which to base research.

Therefore, for future projects it is important that maximum information be obtained in advance from reliable local contacts and government agencies, to avoid the expense of researchers operating from hotels and in unfamiliar circumstances to obtain basic data. In addition, necessary or desirable travel plans could be made to centres of activity in advance and, as far as possible, appointments fixed to make the best use of available time. Finally, local knowledge could avoid the advent of public holidays falling in the proposed working programme.

The two-tier approach has considerable advantages. An official approach with co-operating government officers is desirable, and was shown to yield extremely valuable information. However, although one might expect traders to feel obliged to give accurate and true statements of their activities in the presence of local officials, this is not necessarily the case. Indeed, the official visit that was conducted for comparison purposes produced evidence that some operators were concealing the true nature of their business (i.e., the extent to which ivory was being worked, the amount of ivory on display, turnover etc.). In this respect and others, the unofficial observer can also be of importance.

The approach of posing as a buyer was not totally successful, as Friedlein had neither the mandate, the desire nor the finance to purchase ivory. Whereas the business approach revealed certain information which might not otherwise have been forthcoming, credibility became strained when traders needed to be questioned on matters irrelevant to a commercial buyer, in order to gather information needed to fulfil the terms of reference of the study.

Knowledge of ivory raw material, tusk types and sizes, likely trading practices, etc. was of positive value. It is felt that the pose of interested 'colleague' might in future be more effective, where the observer has such knowledge. It is unlikely that a tourist would be given any serious background information, unless spending a large amount of money with a trader.

Without question, working as an informal team was effective, enabling information to be cross-checked and separate visits and approaches to be made at various levels. Inevitably a subjective element comes into such evaluations. Thus disagreements of fact or opinion could be debated in the field, and information reconsidered or double checked. It is considered that a single investigator spending the same number of man-days in the field would not have accumulated the equivalent amount of information, nor formed an ultimately balanced view of the subject matter.

The overlap of timing of the two people participating in the study, although fortuitous, also had merits. It was probably wise that the researchers did not declare themselves and were not visible as a team to the subjects of the

survey. News travels fast in Africa, and arriving on the same aircraft and/or living in the same hotel would soon establish a connection which would best be kept hidden.

In Abidjan, it was relatively easy to meet frequently without this being too obvious. Such might not be the case in other less cosmopolitan locations, and thus it might be wise to separate the actual timing of visits even more. However, it is important that the researchers be able to meet on site for at least some comparison of feelings and notes.

No project can be undertaken without an idea of budget and costs, but a study such as this requires some flexibility with respect to expenses, travel and communications. In Abidjan, car hire which was tried with some success for one day proved to be relatively costly. The employment of a taxi-driver/guide was cheaper, but less flexible.

In the event of startling information being discovered, researchers should have the mandate to follow significant leads without constraints on financial or time budgets. Such open-ended planning requires considerable trust and faith in the operator, and there are instances where investigations could prove fruitless and invalid.

It is difficult in advance to estimate the cost-effectiveness of studies of this nature, but the present mission has produced some satisfactory results. No doubt further data could have been collected by extending the visit and travelling more widely.

It is perhaps advisable that future studies be planned on similar lines, adopting the lessons already learned, and that wider investigation be commissioned on a separate, second mission if thought desirable after preliminary reports have been filed.

The Ivory Trade in Southern Africa: R.B. Martin

(Abstract prepared by CITES Secretariat)

South Africa

South Africa has been accused of 'laundering' illegal ivory from neighbouring countries. Although there is no evidence to suggest that this is occurring on an official level, loose regulations governing worked ivory do appear to have been exploited to move some illegal raw ivory through the country.

The suggestion that large stockpiles of ivory existed in South Africa appears unfounded. The large stocks reported in South Africa's export quota submissions for 1987 and 1988 were the result of an administrative error. Ivory that was purchased by dealers and subsequently exported was not deducted from the register. Quota submissions also included a large number of personally-held tusks (in the order of 2,000) unlikely ever to be exported.

Imports of raw ivory since 1979 are estimated to have averaged 3.6 tonnes per annum, with a peak of 10 tonnes in 1979, falling to one tonne or less in 1986 and 1987. Until 1986, imports of ivory from Botswana, Namibia, Swaziland and Lesotho would not have been recorded in South African statistics since they share a customs union. This ivory would, however, appear in South Africa's export statistics if it were subsequently re-exported.

The volume of legal worked ivory passing through South Africa has declined sharply since 1981. Whereas in 1980, South Africa imported 24 tonnes, the volume declined to 562 kg in 1987. Worked ivory imports for 1979-1981 (over 20 tonnes annually) contrast with recorded exports for the same period: about 3 tonnes per annum. It is postulated that these statistics reflect either misdeclared shipments of raw ivory or clerical errors.

Prior to 1983, about six tonnes of ivory were being processed annually into worked ivory in South Africa by three major companies. Since then consumption among the companies that remain has fallen to less than one tonne per year.

Kruger National Park, the only significant local source of ivory, had an average annual production of about five tonnes over the 10 year period analysed.

South Africa exported significant quantities of ivory during the period 1979-1988. Ivory originating from legal sources in neighbouring countries (Malawi, United Republic of Tanzania, Zambia, and Botswana, until 1982) and Namibia moved through South Africa, but before 1985 import/export controls were not particularly rigorous. Exports have since declined to less than 12 tonnes per year (down from an estimated high of 68 tonnes in 1979).

Exports of raw and worked ivory exceed the sum of imports plus production by about 11 tonnes annually from 1980-1987. Theoretical estimates were made regarding the amount of illegal ivory that might enter South Africa annually from the neighbouring region, and therefore might account for the difference: 12 tonnes from Angola (based on assumptions about the dynamics of Angola's elephant population); a maximum of 2 tonnes from Zimbabwe (from poaching and embargoed ivory sold at auction); less than 10 tonnes from Zambia, via Botswana

(based on estimates of the number of elephants killed per day in a national park); up to 15 tonnes from Zaire, by air and overland through Botswana (based on two suspect shipments); less than one tonne from Malawi and Mozambique.

These very crude estimates should be interpreted with care since, in most cases, they are based on broad assumptions and extrapolations, rather than concrete physical evidence. Although they suggest that about 40 tonnes of raw ivory might conceivably enter South Africa illegally each year, the figure of 8 tonnes indicated by the difference in import/export statistics for 1987 is more realistic. Some ivory is known to have entered South Africa recently without proper CITES documents, despite having been subject to customs controls.

Botswana

Estimated volumes for both imports and exports of raw ivory between 1981 and 1987 suggest an overall downward trend. A hunting ban has been in effect since 1982, but some ivory has since been accumulated by the Botswana Management Authority. Legal exports of raw ivory in 1988 are estimated at less than one tonne.

The amount of ivory consumed by the local carving industry is small, and was estimated at about three tonnes in the early 1980s, but now is unlikely to exceed two tonnes (perhaps because of a large amount of legal and illegal worked ivory entering the country).

Estimates of the volume of worked ivory imports and exports indicate a significant imbalance. Between 1981 and 1986, annual imports were in the order of 8-10 tonnes, whereas exports were negligible. Since 1987, Botswana is thought to have served as an important transit route for illegal ivory and rhino horn originating in Zambia, Zaire and Zimbabwe, and possibly other countries. Significant amounts of ivory purporting to be 'worked' (actually simply polished with only minor markings) have entered Botswana in recent months: four shipments, each in the order of one tonne. It is suggested that the Botswana-South Africa customs union is being exploited to move illegally imported 'worked' ivory into South Africa (legally), from whence it is re-exported undeclared, or perhaps declared as raw ivory (without South African CITES permits, since the ivory would appear to have been imported into the customs union legally).

Zimbabwe

Zimbabwe's elephant population stands at about 50,000 animals, despite intentions to limit it to some 33,000. Ivory production averages about 15 tonnes per annum (11,240 kg in 1988, added to the 12,164 kg in stock at the beginning of the year). Ivory produced in 1988 came from the following sources: problem animal control (10.8% of tusks / 24.9% by weight); population reduction (71.8% of tusks / 51.7% by weight); natural mortality (10.1% of tusks / 12.7% by weight); and confiscations (7.3% of tusks / 10.7% by weight).

Ivory is available to the local carving industries from government auctions (embargo ivory) and direct sales during the year from the government ivory store. Of the 1988 raw ivory sales, local carving industries purchased 6.9 tonnes (56%), and the balance was exported.

Although one estimate of the local requirement for carving purposes is 15 tonnes, this is thought to be high. Annual sales to the industry seldom exceed 8 tonnes, and the apparent deficit is not likely to have been made up entirely by illegal ivory, as controls on the manufacturers are very rigorous.

It is believed that about 1-3 tonnes of worked ivory from Zimbabwe is being smuggled into South Africa each year. Some reports suggest that the flow of poached ivory from elephants found along the border with Mozambique is significant, but this has not been confirmed.

Zambia

Exports of raw ivory are estimated to have averaged just over 16 tonnes per annum between 1979 and 1985, declining to seven tonnes in 1986 (based on customs statistics of importing countries) and to less than two tonnes in 1988. Zambia closed down all private ivory carving businesses in 1984, and all legal worked ivory now comes from the government carving industry in Chilanga. Exports of worked ivory in 1987 and 1988 totalled 704 kg and 500 kg, respectively. Estimates from 1986 suggested that the official carving industry used about 3.6 tonnes annually, with sales accounting for about 80% of the available worked ivory.

Mozambique

Customs data for imports and exports of raw or worked ivory are not available. There are unconfirmed rumours of major ivory transactions through Mozambique, stemming from its 1988 quota submission of 18,000 tusks. There are independent reports confirming the existence of large stocks in Beira in late 1987 and in Maputo in early 1988, although no ivory was seen during a mission by the CITES Secretariat in April 1988.

The civil war in Mozambique has taken its toll of elephants, with intensive hunting by government military forces and MNR forces; collection of ivory by Zimbabwean troops on service in Mozambique; and furnishing of weapons to local residents by Zambians, Somalis and Tanzanians (to hunt elephant and supply ivory). It is thought that ivory will continue to be produced for several years under the present conditions of disorder. A small amount of worked ivory, less than one tonne, is produced from cottage industries.

Angola

The state of civil war in Angola has precluded the collection of reliable data, however, one may speculate that the present level of illegal exports reaching South Africa is unlikely to exceed 5 tonnes per annum (with a maximum potential production of 12 tonnes). In the past, Angolan ivory has also moved to Zaire and the Congo.

There are unsubstantiated rumours and reports that: UNITA was interested in establishing an ivory carving industry; the UNITA leader has bartered with South Africa using raw ivory; a large stockpile of Angolan ivory exists in the Cape Province of South Africa and at Rantu on the Angolan border; and a large shipment was recently transported to the Seychelles.

Malawi

Figures on annual ivory production are not available, however it is thought to be minimal (in the order of one tonne). The majority is used for the domestic carving industry. This was estimated in 1985 to require just over two tonnes annually, whereas sales from the legal government sources were about one tonne per annum. The balance may have been acquired illegally.

Recent reports suggest that poaching is on the increase.

Namibia

Namibia, with its small, well-conserved elephant population could not produce large amounts of ivory, but might act as a transit route for Angolan and Zambian ivory.

Summary of 'The Raw Ivory Trade' 1979-1987: I.S.C Parker

(prepared by the author)

1. Customs records, data from CITES annual reports and the ivory permit verification system are examined and it is shown that the customs records provide a superior source of data from which to measure the raw ivory trade's volume and value.
2. It is concluded that the measures instituted under CITES to control and monitor the international ivory trade have failed dramatically. The trade has neither been controlled nor monitored.
3. Reasons for the failures are presented: pre-eminent among them is chronic shortage of funding and the failure of Parties in Africa, Europe, North America and Asia (with the singular exception of Hong Kong) to fulfil their treaty obligations to report expeditiously and accurately. However, this has been reinforced by misconceptions of why elephants decline and failure to appreciate that it is a far more general phenomenon that effects many large mammals, a majority of which do not produce highly priced trophies. The lack of appropriate economist/commercial qualification in the personnel chosen to monitor the trade has also contributed to failure. It is also pointed out that the 'quota' system was phoney in that it imposed no limits on either producers or consumers.
4. Evidence is presented to show that elephant decline is not a recent phenomenon and that elephants in Eastern Africa had lost the majority of their 1925 ranges by 1975; i.e., that declines of the past two decades have not been anomalous. They could have been predicted from information that was readily available in the 1950s and 1960s, but which until now, has been overlooked. It is adduced that the primary reason for the failure to conserve elephants in Africa's national parks is not poaching, but grossly inadequate funding. This is also the case outside the parks, though in such areas, under-funding is eclipsed by a fundamentally flawed policy which debars all from access to the resource.
5. Because of these factors, more was expected of CITES in controlling the ivory trade than was reasonable.
6. It is concluded that a far more simple system of monitoring and regulating the ivory trade is called for if CITES is to fulfil a practical role in assisting other elephant conservation measures. Such a system is proposed. Its basic element is that all raw ivory exported out of Africa should be sent directly from governments to a single auction floor in a consumer country (Hong Kong) and that private exports be prohibited. Enforcement of the system would depend on consuming countries banning all raw ivory imports except those coming off the auction floor. The volume of international trade would be controlled by placing a limit on the volume of ivory that would be received on the auction floor in any year. The auction floor would be governed by a Board appointed by both producers and consumers.

7. The auction floor would bring all permit issuance and the physical presence of the ivory covered together, and greatly simplify monitoring: the auctioned ivory would comprise the sum of the ivory legally exported out of Africa.
8. If an auxiliary system was required, it is recommended that customs statistics be adopted as the principal data source on the grounds of their proved superiority over CITES data produced over the past ten years.
9. If the Parties cannot bring themselves to adopt a simple, functional system, as recommended for controlling ivory exports, a prima facie case exists for listing the African elephant in Appendix I of the Convention. There are many strong arguments against such an action and it would presage the Treaty's abandonment and a reversion to bilateral trade arrangements.

Secretariat comments on: 'The Raw Ivory Trade 1979-1987'

In 1988, the Secretariat engaged a consultant to examine the trade in raw and worked ivory, in accordance with a directive of the Parties made under Resolution Conf. 6.12. The resulting report has been circulated to all Parties without comment from the Secretariat. While it would have been preferable to have made detailed comments on the document prior to its circulation, other commitments at that time made this impossible.

The Secretariat regrets that the contribution of the present document towards an understanding of the ivory trade within Africa is limited. Latitude was granted to the consultant to examine the intra-African trade within a more holistic overview -- with the understanding that basic core information on the African trade might benefit from being situated in a broader context. Unfortunately, details of the intra-African trade have largely been ignored, in favour of an extensive review of the relative merits of customs statistics and CITES annual report data up to 1987.

The Secretariat feels obliged to draw attention to this analysis, not only because it is incongruous with the terms of reference of the consultancy, but because many of the data have been misinterpreted and presented with a consistent negative bias against CITES. In some instances, data appear to have been selectively ignored, distorted or used to draw exaggerated conclusions, with the result that a reader might be misled into believing inaccurate statements.

There are numerous factual errors in the sections in which customs and CITES statistics are compared. While it might be advantageous to cite them paragraph by paragraph for the sake of accuracy, the Secretariat believes that little would be gained by doing so in this document since this historical analysis of trade data has only marginal relevance to the present deliberations of the Conference of the Parties. Nevertheless, the Wildlife Trade Monitoring Unit (WTMU) has expressed its willingness to prepare a detailed critique of the report after the October meeting if a number of Parties indicate that it would be desirable to do so. The Secretariat wishes to make it very clear that, in its view, the report's criticisms of WTMU are without foundation.

Notwithstanding these criticisms of the report, it does provide useful background information on the ivory trade, and examines the problems facing the African elephant in a much broader context than is usually the case. In particular, its presentation of alternative causes of elephant decline, the gross inadequacy of current expenditures on protection measures, and the potential for conserving elephants in the present social, economic and political climate are worthy of consideration. In addition, it makes disturbing allegations with regard to the movement of ivory outside of the CITES control system, sometimes with the full knowledge of government officials. In this respect, if the report contributes to a constructive dialogue on weaknesses in the system of international controls, it will have served a useful purpose. Although the Secretariat does not share many of the report's conclusions, it agrees that the long-term conservation of the African elephant will depend to a large extent on the resolution of fundamental problems that go well beyond CITES' area of responsibility.