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EU Commissioner for Environment, Maritime Affairs and Fisheries
European Commission
Rue de la Loi, 200
1049, Brussels

December 7, 2017

Subject: European Commission's public consultation on ivory trade in the European Union (EU)

Dear Commissioner Vella,

We are writing as a concerned group of scientists in response to the current EU consultation on ivory regulations, to urge you to close down the EU's domestic ivory market.

Over the past 30 years, Africa's elephant population has fallen from about 1.2 million¹ to around 415,400, as reported by the IUCN/SSC African Elephant Specialist Group.² Scientists overwhelmingly agree that a primary cause of these worrying declines is the illegal killing of elephants for their ivory. In September 2016, the IUCN confirmed that "*Africa's overall elephant population has seen the worst declines in 25 years, mainly due to poaching over the past ten years*". Elephants are iconic, awe-inspiring animals and perform critical ecological roles in the forests and savannahs they inhabit.³ However, current poaching levels pose a risk to their survival: their numbers are dropping by 8-9% annually both in the forest and the savannah.⁴ Unless this poaching trend is halted, African elephants will continue to disappear across large areas of their range within our lifetime.

We commend the European Commission for developing an EU Action Plan against Wildlife Trafficking, which we believe sets out a comprehensive blueprint for joined-up efforts to fight wildlife crime including through further limits on ivory. However in the case of elephant ivory, we consider that the only solution is for the EU to close its market. Studies of trade in elephant ivory indicate that legal markets provide a cover for trade in illegal products and undermine enforcement efforts.⁵ The United Nations Office on Drugs and Crime (UNODC), for instance, concluded: "*the trade in illicit ivory is only lucrative because there is a parallel licit supply, and ivory can be sold and used openly. Ivory would lose much of its marketability if buying it were unequivocally an illegal act, or if ownership of these status goods had to be concealed*".⁶

This link between the legal and illegal trade also exists in the EU – the world's largest exporter of legal ivory – where traffickers exploit regulatory loopholes in order to misrepresent illegal ivory as legal ivory.⁷ Furthermore, most of the ivory seized in the EU in 2016, amounting to more than 2.5 tonnes and representing the biggest volume seized in recent years, was on its way to Asia – the world's largest market for illegal ivory – demonstrating a link between the EU's illegal ivory trade and international ivory trafficking.⁸ The illegal ivory trade is more than a conservation issue: it exacerbates conflict, corruption, and poverty in countries that are already struggling to defend their economic and national security.⁹ Given the scale of the current elephant poaching crisis across Africa, and the modus operandi of the trade, the EU must eliminate its parallel legal and illegal markets and the resulting opportunities for laundering illegal ivory.¹⁰

Closing the EU's domestic ivory market will also send important signals to other consumer countries and give the EU added credibility when asking other countries to close their own domestic markets. Thank you for the high level of attention and ambition you have given to tackling wildlife trafficking and we look forward to further global leadership from the EU on this critical issue.

Sincerely,

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⁸ European Commission (2017). *Commission introduces new measures to fight poaching and to end trade in raw ivory*, available at [http://europa.eu/rapid/press-release MEMO-17-1307_en.htm](http://europa.eu/rapid/press-release_MEMO-17-1307_en.htm).

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