



March 23, 2015

European Union Ministers in charge of CITES,
M. Karmenu Vella, EU Commissioner for Environment, Maritime Affairs & Fisheries
Copy: CITES Management Authorities

Subject: raw ivory re-export from the European Union.

Distinguished Ministers, Commissioner,

Tens of thousands of elephants are poached every year for their ivory to supply the Asian market. Most range states make tremendous efforts to protect live elephants. At the same time, ivory trade has expanded within the European Union, making the EU the largest exporter of so called pre-convention ivory on the worldwide market. The main destination of these increasing raw ivory exportations, driving demand and thus accelerating poaching, is China.

Some EU Member States, including the United Kingdom, Germany, Sweden and France, have already decided to suspend the export of raw ivory. However, because of the common EU market, these welcome decisions will remain insufficient as long as they are not adopted in all other EU countries. Indeed, the sale of half a ton of tusks on March 7, 2015 in France has shown that auction houses and intermediaries openly offer Asian customers the ability to reroute raw ivory through EU countries where export is still permitted.

We are concerned that the increasing and poorly controlled export of alleged legal ivory from the EU is contributing to driving the insatiable demand for ivory and the largely illegal trade in China and other Asian countries. It is contrary to the recognition by the EU and the international community that demand for ivory must urgently be reduced, in order to save the remaining elephant populations. Moreover, there are concerns that certificates issued by EU Member States are re-used in importing countries to launder ivory from poached elephants. For instance, tusks sold recently in France are intended to be transformed into carved ivory; these transformations prevent officials from verifying that the final articles correspond to the information on their certificates (weight and curve of the tusks, for example). The EU has already issued guidelines banning the re-export of most rhino horns after recognizing its role in the increasing illegal trade and poaching. Similar measures are urgently needed for ivory.

Therefore, the 41 Non Governmental Organizations signatories to this letter urge you to suspend any export of raw ivory and to support a common EU position to this effect at the April 10th Committee meeting on Trade in Wild Fauna and Flora.

In February 2014, the European Union signed the London Declaration and pledged to take action to eradicate the supply and demand for illegal wildlife products. The upcoming ministerial conference on wildlife trafficking in Kasane, Botswana, will be a new opportunity for the international community to express its determination to fight against wildlife crime. Without a doubt the suspension of the exportation of all raw ivory from the EU is an urgently required and concrete action that will reduce trafficker's room for maneuver and contribute to the protection of elephants.

We thank you for your support.
Yours faithfully

Robin des Bois
Charlotte Nithart, coordinator*

Robin des Bois, Charlotte Nithart, France
Prowildlife, Daniela Freyer, Germany
Amboseli Trust for Elephant, Dr. Cynthia Moss, Kenya
Animals Asia, Jill Robinson, Hong Kong
Animal Defenders International, Jan Creamer, United Kingdom
Association pour la Protection des Animaux Sauvages (ASPAS), Marc Giraud, France
Awely, Des animaux et des hommes, Renaud Fulconis, France
Born Free Foundation, Adam Roberts, United Kingdom
The David Sheldrick Wildlife Trust, Rob Brandford, Kenya
The David Shepherd Wildlife Foundation, Rosalind Reeve, United Kingdom
ElephantVoices, Dr. Joyce Poole and Petter Granli, Norway / USA
Elephant Action League, Andrea Crosta, USA
Eastern Caribbean Coalition for Environmental Awareness (ECCEA), Lesley Sully, France
Environmental Investigation Agency (EIA), Mary Rice, United Kingdom
Environmental Protection & Education Association (EPEA), Dr Mohammed Ismail, Egypt
Ecologie sans frontière, Franck Laval, France
Fondation Brigitte Bardot, Christophe Marie, France
Fondation Franz Weber, Vera Weber, Switzerland
Fondation 30 Millions d'Amis, Reha Hutin, France
Friends of the Elephant (Vrienden van de Olifant), Rob Faber, Netherlands
Gallmann Memorial Foundation, Kuki Gallmann, Kenya
Hong Kong for Elephants, Alex Hofford, Hong Kong
Humane Society International, Teresa Telecky, USA
Institut Jane Goodall France, Cyril Michel, France
International Fund for Animal Welfare (IFAW), Céline Sissler-Bienvenu, France
L214, Brigitte Gothiere, France
Ligue pour la Protection des Oiseaux, Allain Bougrain-Dubourg, France
Lilongwe Wildlife Trust, Jonathan Vaughan, Malawi
Mille Traces, Jean-Marie Ouary, France
OSCAP (Outraged South African Citizens Against Rhino Poaching), Allison Thomson, South Africa
Pan African Wildlife Conservation Network, Pat Awori, Kenya
Performing Animal Welfare Society, Catherine Doyle, USA
Planète Tigre, Frédéric Geffroy, France
Rettet die Elefanten Afrikas e.V, Daniela Köstner, Germany
Save The Elephants, Dr. Iain Douglas-Hamilton, United Kingdom / Kenya
Société Nationale de Protection de la Nature (SNPN), Jean Untermaier, France
Sens Afrique Solidaire, Delphine Thibaut, France
Species Survival Network (SSN), Will Travers
WildAid, Peter Knights, USA
WILDAFRICA Save African Animals, Radek Klimes, Czech Republic
Wildlife At Risk International (WAR) Marleen Le Febvre, Netherlands
Wildlife Conservation Society, Dr Susan Lieberman, USA
Wildlife Friends International, Edwin Wiek, Netherlands
Wildlife Friends Foundation Thailand, Edwin Wiek, Thailand

* Please reply at
 Robin des Bois 14, rue de l'Atlas 75019 Paris - France
c.nithart@robindesbois.org