



HONG KONG'S IVORY MORE ITEMS FOR SALE THAN IN ANY OTHER CITY IN THE WORLD

ESMOND MARTIN and LUCY VIGNE


SAVE THE ELEPHANTS
拯救大象

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Front cover:

The traditional Chinese God of Longevity carries a branch of peaches, a symbol for immortality.

Title page:

This carved ivory tusk, said to have been looted long ago from the Emperor's Palace in Peking, was for sale in Hong Kong for HKD 350, 000 (USD 44,872).

Back cover:

Grand displays of mammoth ivory in Hong Kong attract the richest of buyers.

Photographs:

Lucy Vigne:

Front cover, title page, pages 6–18, 26, 31 except bottom left, 32 left, 33–36 left, 37–38, 40–46, 49, 51–53, 57–60

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CONTENTS

07	Executive summary
08	Elephant ivory
10	Mammoth ivory
13	Introduction
15	Legal position of the ivory trade
15	Elephant ivory
18	Mammoth ivory
19	History of the ivory trade
19	Elephant ivory history
22	Mammoth ivory history
25	Methods of research
26	Results of fieldwork
26	Sources and wholesale prices of tusks
26	Elephant tusks
27	Mammoth tusks
29	Carving
29	Elephant ivory
29	Mammoth ivory
30	Retail outlets, items, prices and buyers
30	Outlets displaying elephant ivory items for sale
33	Types of elephant ivory items seen for sale
34	Retail prices for elephant ivory items
35	Buyers of elephant ivory objects
37	Outlets displaying mammoth ivory items for sale
39	Types of mammoth ivory items seen for sale
40	Retail prices for mammoth ivory items
41	Buyers of mammoth ivory objects
42	Substitutes
42	Vendors' attitudes
44	Elephant ivory in the future
44	Mammoth ivory in the future
45	Discussion
45	Elephant ivory trends in Hong Kong
47	Mammoth ivory trends in Hong Kong
48	Comparisons with mainland China's elephant ivory trade
51	Comparisons with mainland China's mammoth ivory trade
52	Law enforcement challenges in Hong Kong
52	Elephant ivory
55	Mammoth ivory
56	Conclusion
58	Acknowledgements
59	References
61	Tables



Carved mammoth tusks are noticeable and easy to distinguish by their brown outer colouring.

EXECUTIVE SUMMARY

Hong Kong displays for retail sale more elephant and mammoth ivory items than any other city in the world surveyed for ivory. There are also large, intricately carved pieces of mammoth ivory that can be legally taken out of Hong Kong, as they were carved from the extinct mammoth. This is in contrast to mainly trinkets, especially jewellery, that are carved from elephant ivory. They are illegal to export, but being small, these items are easily smuggled out in personal luggage. Hong Kong is one of the biggest tourist destinations in Asia. The city has a population of about 7 million people yet attracts over 50 million visitors a year, mostly mainland Chinese. They come to shop, including for luxury products such as ivory because these items are less expensive than on the mainland.

Despite recent pressure in Hong Kong against the retail ivory outlets, the government allows the sale, for domestic use, of ivory items registered with the government as old stock owned before the 1990 CITES ivory ban. Mainland Chinese visitors have become the major buyers of this ivory, and with their numbers increasing annually to Hong Kong, demand for both types of ivory has been rising. This has created a law enforcement challenge concerning elephant ivory items smuggled across the borders into mainland China.

The following bullet points were obtained from our recent study:



Both polished tusks and carved tusks of mammoth ivory are attracting more buyers as they are legal to export.

ELEPHANT IVORY

- All imports of ivory into Hong Kong, both raw and worked, are illegal with few exceptions.
- The domestic ivory trade in Hong Kong is legal only if the shop selling ivory items has a Hong Kong government licence on display and if the worked ivory is pre-1990 private stock and officially registered. Carving of pre-1990 officially registered tusks in private stocks is technically legal in Hong Kong but vendors say it rarely occurs as vendors still have large quantities of old items to sell. The number of legally registered ivory traders in Hong Kong declined from 692 in 2004 to 357 in 2010, but since then the number has stayed the same. The number of legally registered outlets selling ivory items declined from 822 in 2004 to 465 in 2010, and then stabilized.
- Hong Kong has more ivory items for retail sale, virtually all small items and trinkets, than any other city in the world. In our recent survey in December 2014 and January 2015 we counted 72 retail outlets offering for sale 30,856 ivory items. In December 2010/January 2011 the 62 outlets surveyed displayed 33,516 items.
- Compared with the previous retail ivory survey carried out four years earlier, the number of ivory items for retail sale in this survey was 10% less.
- In 2014, four department store chains removed the ivory items displayed for sale due to pressure from conservation activists.
- The most numerous type of ivory item offered for retail sale is jewellery (57%), especially rings, pendants and necklaces; next in number were small figurines (31%).
- Retail prices in this survey for trinkets—rings, pendants, chopsticks, bangles, name seals and cigarette holders—that make up 55% of the items we saw for sale were less than half the price of these items we priced in Beijing in 2014. Cheaper prices encourage many of the mainland Chinese to shop in Hong Kong for ivory items.
- Hong Kong's retail prices have more than doubled since our previous survey four years earlier for the most comparable items such as bangles, earrings and pendants due to the increasing demand from mainland Chinese buyers.
- The most expensive ivory item offered for retail sale was a pagoda 105 cm tall, for HKD 2,500,000 (USD 320,513). It had been made before the 1990 CITES trade ban.
- Well over 90% of the ivory objects in Hong Kong are bought by mainland Chinese. In 2013 over 40 million mainland Chinese visitors came to Hong Kong, more than double the figure for 2009, mainly to shop for luxury goods, including ivory trinkets. Small items are most popular, being less expensive, and they are easy to smuggle.
- Nearly all the ivory items bought by the mainland Chinese are smuggled across the border from Hong Kong into mainland China. Law enforcement efforts are inadequate on both sides of the border, due to the huge number of people and massive amounts of luggage, insufficient number of inspectors or detection and weak penalties. Inspections concentrate on the mainland Chinese side on taxable luxury items and drugs, not wildlife products.
- Vendors fear that more pressure against the ivory trade will force more outlets to stop selling elephant ivory items in Hong Kong.



Most popular ivory items for sale are small, such as jewellery and name seals, called chops in Hong Kong.

MAMMOTH IVORY

- Mammoth ivory is legal to import, carve, sell and export everywhere, the main exception being India.
- By far most mammoth tusks originate in Russia where the main Russian dealer is based. In 2014 he bought raw tusks collected in the tundra for USD 700–800/kg for Grade A, the top quality. The average weight per tusk that he sent to Hong Kong was 30–35 kilos, much heavier than today's elephant ivory tusks.
- Hong Kong and mainland China import nearly all Russia's mammoth tusks. Imports into Hong Kong have been increasing. In 2014 Hong Kong dealers imported 54 tonnes of mammoth tusks compared with 22 tonnes five years earlier. In 2014 importers in Hong Kong paid the main Russian dealer USD 1,200/kg for Grade A material. In 2014 the wholesale price in Hong Kong for Grade A mammoth ivory was USD 1,500/kg compared with USD 600/kg in 2010.
- From 2007 to 2014, 78% of the tusks imported into Hong Kong were re-exported to mainland China. Most raw mammoth ivory goes on to mainland China (especially Guangdong Province) for processing because labour is much cheaper there, and there are only perhaps 10–20 carvers in Hong Kong who can work mammoth ivory. Many items are then returned to sell in the traders' outlets or other outlets in Hong Kong.
- Hong Kong is the main centre for mammoth ivory and has the largest number of items displayed for sale in any city in the world. In our survey we recorded 27 retail outlets offering for sale 20,583 mammoth ivory items. These figures have risen in number since the last survey four years ago when 24 retail outlets were surveyed and the number of items (excluding beads) was 13,950.
- The most numerous displayed mammoth ivory objects for retail sale in Hong Kong are figurines and figures, making up 97%. In late 2014, a small 5-cm figurine on display for sale was about 40% more expensive in Beijing. This is partly because there are fewer taxes in Hong Kong than in mainland China.
- The most expensive mammoth ivory object offered for retail sale was an elaborately carved tusk weighing 90 kg for HKD 28,000,000 (USD 3,589,743).
- Retail prices in Hong Kong for mammoth ivory figurines and pendants increased fourfold from early 2011 to early 2015 due to the huge increase in the price of the raw material, rising wages for carvers and growing customer demand from the mainland Chinese.
- At least 80% of the mammoth ivory items are bought by mainland Chinese; next are Americans, Western Europeans and Russians.
- Vendors are confident about the future of mammoth ivory sales because this trade is legal almost all over the world and demand is rising, especially among the mainland Chinese.



Elaborately carved mammoth tusks have become a symbol of status and wealth.



A typical side street in Kowloon.

INTRODUCTION

In the 1970s, Hong Kong was famous as one of the largest importers of elephant tusks; the city was a main ivory-carving centre, had a major retail ivory trade, and also was the biggest re-exporter in the world of both raw tusks and carvings. In the early 1980s the number of carvers fell by 30% due to a recession. At that time Americans were the main buyers of ivory items in Hong Kong; next were Europeans and Japanese (Au Ming Chi, chairman, Hong Kong and Kowloon Ivory Manufacturers Association, pers. comm. October 1982). Traders in Japan steadily increased their domestic ivory trade, surpassing Hong Kong in the 1980s. Meanwhile, poaching of elephants in Africa to meet the demand for ivory in East Asia soared.

The African elephant population fell from a minimum of 1,300,000 in 1979 to 609,000 in 1989 (Douglas-Hamilton 1992). This resulted in the CITES 1990 international ivory trade ban. Japan's trade then collapsed due to falling demand within the country, and ivory carving in Hong Kong virtually stopped. Hong Kong, however, became once more the biggest centre for domestic retail ivory trade in the 1990s with sales of their large quantities of pre-1990 ivory items still being permitted within Hong Kong to allow dealers to dispose of their old stocks. Ivory could not be legally exported by anybody after 1991 without considerable paperwork, making exports essentially impossible.

It was not until China's economic boom from 2002 onwards that sales of Hong Kong's ivory items steadily increased as many more mainland Chinese came to shop in Hong Kong each year. Following a study on the mainland in 2014 (Vigne and Martin 2014), we learned that the more expensive ivory items smuggled into mainland China from Hong Kong had become popular as investments. Not only were they being kept for personal use and as gifts, but also items were bypassing the legal outlets on the mainland for trade. Some of these ivory objects were also sold in auctions, until the Chinese government closed this practice down at the end of 2011.

Sales of these items continued to occur on

social media, such as on WeChat in mainland China. Investors on the mainland were buyers from WeChat and they also bought from Hong Kong directly. Staff at branches of the Chinese Arts and Crafts outlets told a journalist that mainland Chinese buyers were 'snapping [up] ivory not only for display but as an investment' (Parry 2013). Brendon Moyle (2014) and Yufang Gao (pers. comm. March 2015) support the viewpoint that ivory items are being bought by Chinese mainlanders for investment. Raw tusks may also be bought in Hong Kong and smuggled into mainland China for traders to sell in the future at a greater profit, speculating on tusks becoming rarer and thus more in demand, as some people have predicted.

Continued high levels of elephant poaching are threatening the survival of some elephant populations, especially in central Africa and Tanzania. Large shipments of ivory are being smuggled via Hong Kong to the mainland, according to Hong Kong officials. Also, many of an ever-rising number of Chinese workers in Africa buy ivory to take back home. This has encouraged demand for ivory in the region. Hong Kong's large involvement in retail ivory sales has attracted increasing media attention worldwide with protestors and lobbyists in Hong Kong trying to ban domestic sales of ivory items.

These facts prompted us to carry out a follow-up survey of the retail ivory trade in Hong Kong, updating information collected during earlier surveys undertaken in 2002 and 2010/11. Have the number of ivory buyers been increasing in Hong Kong with more mainland Chinese visiting the city annually? Were the ivory stocks in Hong Kong finally being used up? As a look-alike material to elephant ivory, was mammoth ivory increasing in sales and demand? What was the attitude of the vendors today about the future of their ivory trade?

This monograph describes our survey of the retail ivory trade in elephant and mammoth ivory items in Hong Kong today, and compares it with findings four years earlier; it also compares it with that of the retail ivory markets on the

mainland over this period. The monograph also looks at law enforcement issues in Hong Kong. It is hoped that the findings described will help those involved to establish recommendations that can be followed up urgently in order to

improve radically law enforcement on the ivory trade within the city and at its borders.

Where we use the word 'ivory' alone in this report, it refers only to elephant ivory.



The start of Nathan Road on Kowloon Peninsula overlooks Hong Kong Island, areas visited by many tourists.

LEGAL POSITION OF THE IVORY TRADE

ELEPHANT IVORY

The British government ruled Hong Kong from 1841 to 1997. The United Kingdom joined CITES in 1976. The year before, CITES Parties had put the Asian elephant (*Elephas maximus*) onto Appendix I, banning international trade, and they put the African elephant (*Loxodonta africana*) onto Appendix II in 1977, allowing controlled trade in ivory with export permits. The British government had taken out a CITES reservation on joining the Convention to allow Hong Kong further trade in Asian elephant tusks while it set up a trade policy to conform with CITES, and on 4 February 1977, it took out a reservation also for the African elephant. On 3 July 1978 the government withdrew both reservations, having produced an ivory import policy that was stricter than CITES requirements (Milliken and Melville 1989).

Elephant poaching was soaring in Africa in the 1970s and 1980s; on 16 June 1989, the Hong Kong government's Agriculture and Fisheries Department, AFD (later to become the Agriculture, Fisheries and Conservation

Department, AFCD) stopped issuing licences to import elephant tusks. But it did allow consignments that had been ordered earlier to come into Hong Kong (TRAFFIC 1989), but these amounts were very small. Then CITES Parties prohibited imports and exports of ivory in January 1990 preventing Hong Kong's international ivory trade. On 18 January 1990, the government took out a reservation to allow the re-export of ivory stocks from Hong Kong for six months, up to 17 July 1990 (TRAFFIC 1990). All the stocks had to be registered with the government (Table 1).

Since then, no new ivory has been allowed to be imported legally, with few exceptions, including ivory for scientific studies, museum display, education and training. Thus all ivory items seen for retail sale in Hong Kong since 1990 have had to be from legally registered old stocks. There are rare exceptions for the legal international ivory trade. These are for worked ivory for personal use, notably from Zimbabwe, and some European pre-Convention (July 1975) tusks that have been CITES approved for exports using 'O' source that allows them to be used commercially (Dan Stiles, ivory expert, pers. comm. May 2015).

The possession and sale of ivory in Hong Kong is regulated under the Protection of Endangered Species of Animals and Plants Ordinance, Cap. 586, which is the local legislation that gives effect to CITES in Hong Kong. The ordinance provides that the possession of ivory for commercial purpose requires a 'Licence to Possess' ivory for trade for each outlet; this is issued by AFCD (pers. comm. December 2014). These licences have to be within a specified validity period. The number of Licences to Possess for commercial use of ivory decreased from 1,101 in 1990 to 447 in 2013 (Table 2). The number of licensed traders during this period also declined from 880 to 364. The number of Licences to Possess was higher than that of the licensed ivory traders because some traders had more than one outlet.



Fraudulent CITES permits for mammoth ivory may be offered to customers to supposedly help in exporting any such items, although it is an extinct species.

No licences are needed for the possession of ivory for non-commercial purposes, such as personal effects, in Hong Kong. Commercially licensed stocks of ivory, both raw and worked, can be legally sold domestically, but cannot be re-exported, excluding rare exceptions under specific and stringent circumstances permitted under CITES.

There are changes in recording the data on the weight of officially registered ivory stocks. In 1990 the then AFD registered 474 tonnes of raw and worked ivory for commercial purposes, including some ivory for non-commercial purposes and some pre-Convention ivory. According to the ordinance, possession of ivory for commercial purposes requires a licence. In 2009 the system was then revised: the registered stock figure consisted only of the commercial stocks of registered ivory that were then 178 tonnes. Thus, non-commercial ivory and pre-Convention ivory were not included as before in the figures (Table 1).

There was a discrepancy with the number of Licences to Possess in earlier data. From statistics supplied by AFCD in 2010 and published in *Pachyderm* 50 on page 47, there were recorded 577 outlets with Licences to Possess ivory registered in 2009 and 432 in 2010. However, both these figures were under recorded, according to later figures from AFCD. In a 27 October 2014 email, AFCD explains 'the figures in Table 2 on page 47 of *Pachyderm* have left out a small group of licences as our computer system could not capture such licences. The system has been rectified'. The newly updated figures for 2009 and 2010 are recorded in Table 2.

Legislation demands that illegal ivory discovered by Hong Kong officials must be seized and kept in the official government stockpile. Staff of AFCD (pers. comm. January 2015) state that almost all shipments of ivory confiscated in the Hong Kong area are destined for mainland China. From 2011 through 2013 there were a minimum of 37 seizures of 14,944 kilos of ivory smuggled into Hong Kong; it had

originated or was in transit from a number of countries such as Kenya and Tanzania. Traders find it safer to ship large ivory consignments by sea via the ports of entrepot countries that are more corrupt. In contrast, smaller shipments, both raw and worked ivory, are sometimes carried by air in luggage to Hong Kong (AFCD, pers. comm. January 2015). In 2013, the most recent full year for statistics, Hong Kong officials confiscated and reported to ETIS (Elephant Trade Information System) the third largest weight of seized ivory for that year: 8.265 tonnes, surpassed only by Kenya (14.5 tonnes) and Tanzania (9.5 tonnes) (Tom Milliken, director ETIS, pers. comm. February 2015). The big unknown is how much more illegal ivory passes through Hong Kong and is never detected. After authorities purposefully destroyed about 12 tonnes of confiscated ivory between May and December 2014, the remaining ivory is being destroyed by batches, and the figure is no doubt rising again.

As well as customs carrying out inspections at the international boundaries, ports and airports, AFCD is responsible for checking for illegal ivory elsewhere in the city. This involves visiting the retail outlets and making sure their licences are within the validity period as well as following up on any outlets reported to be selling ivory illegally, and investigating suspicious dealers and illegal supplies of ivory in the city. In January 2015 AFCD had eight full-time inspectors for inspecting local shops who concentrated their efforts especially on elephant ivory, as well as other shops selling endangered species. Officials say it is not possible for them to inspect all the outlets and dealers selling ivory every year; instead they inspect those they consider need greater attention (AFCD, pers. comm. June 2015). But since 2013 and 2014, AFCD has cooperated with customs to conduct joint inspections of local ivory shops and art and crafts shops (AFCD, pers. comm. January 2015).

AFCD has an intelligence unit within its department to obtain information on people breaking the wildlife laws, but they also rely on intelligence from other Hong Kong government

departments and overseas organizations.

If someone is sentenced in the law courts for illegal ivory transactions, he or she will be fined usually around HKD 20,000 (USD 2,564) to HKD 60,000 (USD 7,692) and/or three to six months in prison, depending on the severity of the crime (AFCD, pers. comm. January 2015). The maximum

penalty permitted under Hong Kong law for the illegal import, export or possession of ivory for commercial purposes is a fine of HKD 5 million (USD 641,000), imprisonment for two years and forfeiture of the ivory (Hong Kong Government 2015a). From 2011 to 2013 42 people convicted for smuggling ivory, with eight months being the highest penalty (So 2014).



Cross-hatchings of elephant ivory have a more obtuse angle and mammoth ivory a more acute angle, as can be seen in this elephant tusk cross-section on the top of this carving. Cross-hatchings are a good way to distinguish the ivories for legislative purposes.

MAMMOTH IVORY

Mammoth tusks originating mostly from north-east Russia can be traded legally virtually all over the world as the mammoth (*Mammuthus primigenus*) became extinct over 3,000 years ago and thus the species is not on a CITES Appendix. Hong Kong is one of the largest importers and sellers of mammoth ivory. Imports, carving, domestic sales and exports of raw and worked mammoth ivory are all legal. When carved the whiter items are more difficult to tell apart from elephant ivory and

this can confuse inspectors. Mammoth ivory tusks in cross-section have cross-hatchings, called Schreger lines, of less than 90 degrees as opposed to elephant ivory that has cross-hatchings greater than 90 degrees. The smaller the item, however, the more difficult it can be to see the lines clearly, making the legal process of checking smaller items a challenge as there is no simple system yet devised to test the two materials in a shop or at customs.



Mammoth ivory, as in this gift shop, had a label saying so, but small items (as enlarged below) may be mixed on the same shelves with elephant ivory, making it difficult to differentiate.



Some outlets selling mammoth ivory items give customers information about the extinct mammoth to encourage sale of this legal material.



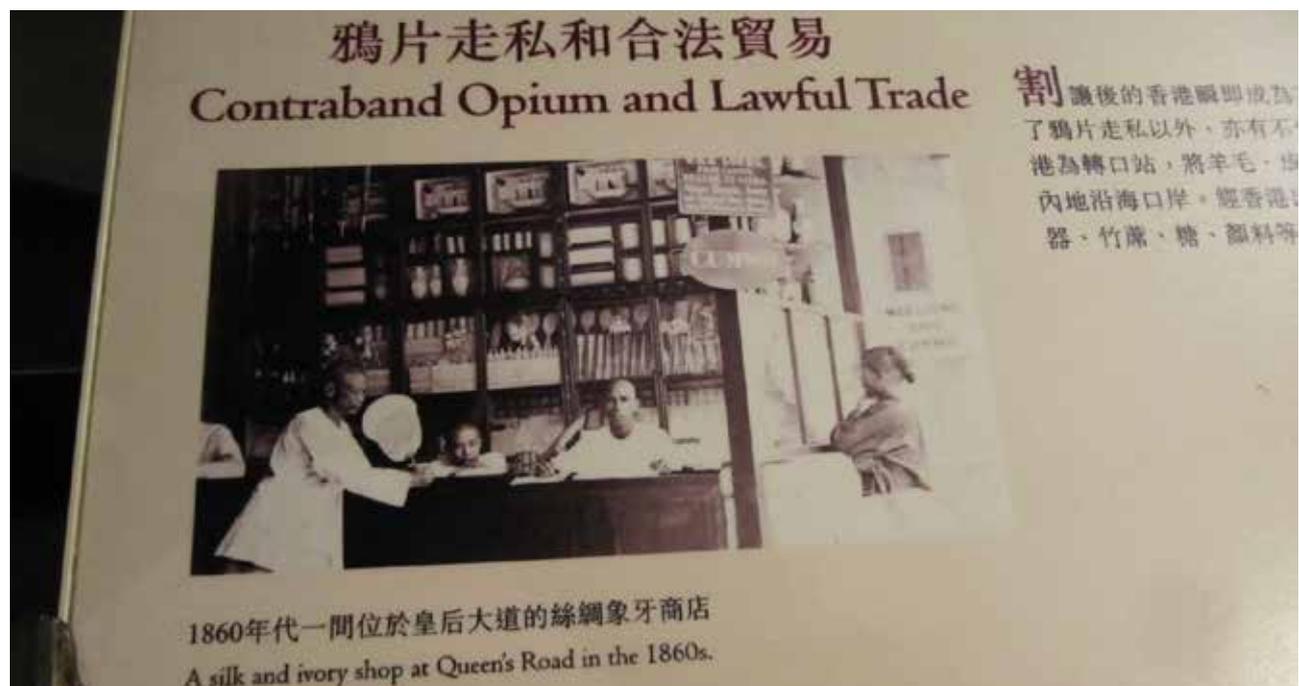
HISTORY OF THE IVORY TRADE

ELEPHANT IVORY HISTORY

The Hong Kong ivory carving industry developed in a few decades from being insignificant in 1940 to being one of the largest in the world by the 1960s. Before World War II, the big cities in mainland China each had more ivory items for sale than Hong Kong, mainly for export (Parker 1979). In 1945 Hong Kong's population was just 600,000. There were only about 100 ivory carvers at that time. During the chaos that occurred in China immediately after World War II, some carvers fled to Hong Kong and by 1947 the city had 200–300 ivory carvers. In 1949 with the establishment of the Communist government in China, more Chinese fled to Hong Kong and the city's population expanded sharply. Many businesspeople who had owned ivory factories in China moved to Hong Kong with their carvers. Most came from Guangdong Province nearby, a major ivory centre with a long history of over 2,000 years in trading and carving tusks. In 221 BC raw ivory is known to have been traded in Guangzhou and ivory was being carved in the Han period of 206 BC to AD 9 (Li 2005). Many staff working in ivory factories in Fujian Province also fled to Hong Kong at this time (Lee et al. 1978). This province had an ivory industry from at least the Song Dynasty of AD 960–1278, and carving has remained a Fujian specialty ever since. Therefore, Hong Kong benefited from the arrival of talented ivory carvers and ivory dealers.

In the 1950s and 1960s, with the nationalization of almost all privately owned businesses in China, many more ivory traders and craftsmen were driven into Hong Kong; by 1960 there were 1,500 ivory carvers and in 1970 the figure reached about 3,000 (Martin and Stiles 2003). According to the Hong Kong Ivory Manufacturing Workers General Union (1978), which carried out the first detailed survey of the ivory factories in Hong Kong in 1976 (Table 3), the numbers of ivory carvers peaked in 1975 and 1976 at 3,204 and 3,575 respectively. Numbers then started to fall as electric drills were introduced, which speeded up production. In the late 1970s nearly all carvers were using electric tools, reducing labour time by at least 50%, enabling the carvers to double their output. At this time they were earning USD 430 a month, compared with only USD 35 in mainland China (Martin and Stiles 2003).

In Hong Kong carvers in their heyday were paid for what they produced, motivating them to work harder, rather than receiving a monthly salary as in mainland China. In the late 1950s traders in Hong Kong were importing more tusks than anywhere else in Asia. From 1952 to 1959 tusk imports averaged 124 tonnes annually. The amount rose to an average of 224 tonnes annually in the 1960s and jumped to an annual amount of 463 tonnes in the



This silk and ivory shop on Queen's Road was photographed in the 1860s.

A VISIT TO A HONG KONG IVORY WORKSHOP IN 1979, BY ESMOND MARTIN

On my first research trip to Hong Kong in 1979, then the major centre in the world for ivory carving, I wished to visit a typical family-run ivory workshop. I approached a major ivory businessman, who was a friend, asking him to arrange for me to visit one of the workshops that supplied finished ivory items to his business and to accompany me. He agreed but told me that I would not be able to take photographs.

The ivory businessman chose the Pak Lok Ivory Manufacturers, a family-run business specializing in making concentric balls. The workshop was located in the northern part of Kowloon in a nondescript residential and commercial building. We walked up several flights of stairs to the flat, which was protected by a strong iron gate. Inside were several rooms where the craftsmen worked. Ten male artisans (presumably all extended family members), some not wearing shirts due to the heat, were working in various stages of making concentric balls, sometimes called 'magic balls'. The first stage consisted of a carver, using electric tools, who made the ball round; the second artisan crafted the inside of the ball into layers; and the third person added the decoration. Making a 20-layer ball took about five days.

My businessman friend, who supplied the tusks, visited the workshop regularly to check the quality of the output. Several other ivory merchants also paid Mr Pak Lok, then about 60 years old, for ivory items made in his workshop. If salaries were paid, my friend impertinently told me, 'the craftsmen would sleep more often'. To increase his income, Mr Pak Lok sold the ivory shavings from the outer part of the raw tusk (usually brown in colour) for fertilizer and the white shavings for medical purposes.

The standard of living for Mr Pak's family members was reasonable. They possessed, among other items, an air conditioner, some fans, a TV, and Western-style furniture. Some of the family members slept in the flat. They worked long hours and were secretive, fearing that competitors might learn their techniques in making the concentric balls, thus the metal gates. During their leisure time, some of them played mahjong. None were formally well educated.

1970s. Virtually all of the raw ivory was from Africa, sometimes shipped via Europe and the Gulf States (Parker 1979, 1989). Hong Kong artisans carved much of it and the rest, mostly the largest tusks, was re-exported to Japan and exported to China.

From 1975 to 1977 craftsmen consumed 255 tonnes of tusks a year in Hong Kong (Parker 1979). In 1976 the Hong Kong government knew of 234 ivory carving establishments, all private (Hong Kong Ivory Manufacturing Workers General Union 1978), of which 121 were ivory workshops, sometimes called factories, with six or seven carvers each (Parker 1979). In 1978 there were about 50 Hong Kong-based importers of raw and worked ivory: 36 Chinese, 12 Indian or Pakistani, 1 European

and 1 Japanese. The oldest firms were those of the Indians and Pakistanis, who had been large importers in the 1950s and 1960s when they would buy raw ivory from colleagues in Zanzibar, Mombasa and Dar es Salaam (Parker 1979).

By 1978 the figure had risen to 156 ivory workshops in Hong Kong (Parker 1979). The workshops often were family based, unlike the much larger government-owned factories in China that had some 100 carvers working together in one big room (Martin 1988). Most ivory items produced in Hong Kong were inexpensive pieces of jewellery. Artisans also produced netsukes, figures and carved tusks, making items of their own choosing or according to orders from wholesalers and retailers.

Two associations controlled the ivory trade and managed it extremely well. By 1978 the Hong Kong and Kowloon Ivory Manufacturers Association had 50 members and the Hong Kong Ivory Manufacturing Workers General Union had 2,000 members of whom 300 were previously from Fujian Province and 1,700 from Guangdong Province (Hong Kong Ivory Manufacturing Workers General Union 1978). In 1978 the annual payroll for the ivory workshops' administrative staff and craftsmen was USD 13 million. The government then had registered private stocks of 16 tonnes of worked ivory and 108 tonnes of raw ivory worth about USD 31 million (Parker 1979).

During the late 1970s perhaps 75% of the ivory items carved in Hong Kong were exported wholesale worldwide, mostly to Europe and North America. It was mainly Western foreign tourists in Hong Kong who bought the remaining 25%. The Hong Kong Chinese sometimes bought items for their Western colleagues but rarely for themselves.

In the 1980s Hong Kong's ivory industry declined sharply. In the early 1980s this was because of the Western economic recession and later on it was due to increasing restrictions on ivory in Hong Kong that made it more difficult to import tusks, forcing prices to rise. Also there was rising competition in worked ivory production occurring in nearby countries, especially Japan for the Japanese market, and in China, Myanmar and Thailand where carvers were cheaper to employ, mainly for the export market.

In the mid-1980s stronger regulations in Africa as well as in Hong Kong caused tusk imports to fall from an annual average of 479 tonnes from 1980–1984 to 186 tonnes from 1985–1987. The trade had become more bureaucratic and less viable for businesspeople and carvers in the city, with some moving on to other jobs. The average tusk import price in Hong Kong went up from USD 39/kg in 1983 to USD 83/kg in 1987 and USD 100/kg in 1988. During the decade, the number of carvers dropped by 67%. In 1982 the number was 1,500 and by 1989 there were perhaps 700 (Martin and Stiles

2003). With the reduction of ivory consumed in Hong Kong, more was being re-exported to Japan (bigger tusks) and China (smaller tusks).

By the time of the bans on ivory imports and exports in 1989 and 1990 the Hong Kong ivory business was already in serious decline, with ivory carving having almost stopped, and there remained a vast quantity of ivory items that had become progressively difficult to sell. Exports became illegal from mid-1990.

From 1990 to 2000 all private ivory stocks recorded with the government nearly halved from 474 tonnes to 261 tonnes as traders sold their items. By 2008 these stocks fell by just over 10% to 232 tonnes. The official records available from 2009 onwards showed a continuing decline in private stock quantities, but by then only so-called commercial ivory stocks were being registered. Such stocks cannot be compared with the earlier figures, which included non-commercial stocks as well (Table 1). AFCD's explanation for the large decline in stocks in the 1990s was due to illicit exports, internal sales within Hong Kong and loss (AFCD, pers. comm. December 2014). The officially reported decline in these commercial stocks in the 2000s was small and this is not clearly understood or explained by AFCD; this is despite the sharp increase that decade in the number of mainland Chinese coming into Hong Kong, who were by then the principal buyers.

During our survey work in 2002, 2004 and 2010/11 looking at Hong Kong's ivory trade, vendors and officials said that although it was legal to carve ivory registered pre-1990, there were no full-time elephant ivory carvers and only five or six part-time ones left, mostly working from their homes and mostly doing repairs. Nor was there much information over this period on illegal imports into the city of raw and worked ivory or illegal re-exports and exports of raw and worked ivory out of Hong Kong. Survey information obtained since 2002 thus has concentrated on the retail outlets selling ivory. In 2002 there were 85 retail outlets displaying 35,884 ivory items for sale (Martin and Stiles 2003). Two years later, 80 retail outlets were

displaying 37,948 ivory items for sale (Martin 2006). In December 2010/January 2011, 62 retail outlets were displaying 33,516 ivory items for sale (Martin and Martin 2011). Thus from 2002 to December 2010/January 2011 (the last survey before this one), the number of ivory items openly seen for sale remained roughly the same. The big change over this period was that the main nationality of buyers shifted

from Japanese, Europeans and Americans to mainland Chinese. The Hong Kong Chinese bought very few items—since the 1970s they have had little interest in ivory for themselves, generally only occasionally choosing pieces as gifts for foreign visitors, for whom now they can buy mammoth ivory objects that can legally be taken abroad.

MAMMOTH IVORY HISTORY

Mammoth tusks in Europe have been used for carving figures for more than 25,000 years, but this raw material was barely known in mainland China or Hong Kong until the 1990s. Interest in it then grew among certain elephant ivory dealers and vendors who wanted to continue to trade in an ivory material after the CITES 1990 ban that prohibited international commercial sales of elephant ivory. Mammoth ivory became the most popular alternative for these former carvers and dealers of elephant ivory; demand for it gradually expanded. Three such dealers in Hong Kong, for example, remain in the business today.

The first dealer, whose family was from northern China, set up an ivory business in the mid-1960s. In 1994, because of the 1990 CITES ivory ban, he started a factory in China to carve teakwood. He also experimented in carving hippopotamus (*Hippopotamus amphibius*) teeth, which he obtained for HKD 300/kg (USD 38) in 2002 from a Hong Kong dealer (hippos had been put on Appendix II in 1995, allowing controlled trade). These hippo teeth were carved at his teakwood factory in China as labour was much cheaper there than in Hong Kong. They were difficult to carve, being of a particularly hard substance, and they tended to crack during carving and even afterwards. Hippo teeth objects did not become popular with people in mainland China nor in Hong Kong. Thus in 1999 the family tried using mammoth ivory. They bought tusks from a Hong Kong dealer for USD 10–20/kg for poor-quality material, USD 40/kg for small but good-quality tusks and USD 220/kg for large, high-quality ones. The wastage for large, expensive

tusks was at least 60% compared with 35% for the biggest elephant tusks, but the mammoth tusks were big and their quality was good. By 2002 the company was carving three tonnes of mammoth ivory a year in mainland China, employing 80 carvers with only 20 artisans still carving wood. Chinese people at that time were not so familiar with mammoth ivory, and the main buyers were Americans and Europeans. In 2002 the company's gross revenue was 90% for mammoth ivory items, 5% for hippo items and 5% for selling their old ivory carvings. Today, the company remains a family business, now run in Hong Kong by the dealer, his wife and son. The company continues to be one of the largest wholesalers and retailers of mammoth ivory items, specializing in smaller objects such as netsuke (Japanese toggles) style figurines.

Another businessman, who was also an ivory artisan, tried a variety of materials to carve after the 1990 CITES ivory ban. He opened a factory with 10 apprentice carvers near Guangzhou in 1990 because his family originally came from that province. He travelled back and forth between Hong Kong and Guangdong Province for work. First he gave his carvers tagua nuts (*Phytelaphas macrocarpa*) from South America to carve, but the enterprise was not financially viable because these nuts cannot produce fine carvings and they are very small. In 2004, some companies successfully used these nuts to make white buttons, the trader said. He then tried cattle bones (not camel bones because they were difficult to find). They were 'messy to carve and smelly to use'. He preferred rosewood from South America as being more profitable. His

workers crafted this wood mostly into furniture to sell in Hong Kong, especially to Taiwanese and other Asians.

In 1990 his carvers also experimented with hippo teeth, making small figurines to sell in Hong Kong, both wholesale and retail, but they did not sell well. The business owner tried to sell them in Europe and later in the USA, but it was not financially successful as his hippo ivory items tended to crack.

In 1997 he stopped carving hippo teeth and started to use mammoth tusks. He found these carvings an attractive and profitable alternative to elephant ivory. He imported the tusks, mostly from Russia, directly into mainland China, and paid the import duty to the Chinese government (in 2004 this was 26–29%), which in theory could be refunded if the items were exported. He never, however, tried to recoup his money

because of the excess bureaucracy involved. In 2004 his factory employed 40 craftsmen, who consumed about a tonne of mammoth tusks a year, making jewellery, and copying *okimono* (Japanese figurines) as well as the more common netsuke-type items that were his most profitable. He would have five different artisans in his factory producing one netsuke: the first crafted the crude shape, the second carved the item, the third put in the details, the fourth polished, and the fifth added colour. Most customers at that time wanted a brown antique finish.

He sold 10% of his output in Guangzhou where he had a retail shop in the jade market. Mainland Chinese there would come in and admire the items but few bought because they did not know about mammoth ivory, preferring to buy his cheaper bone objects. The rest of his mammoth ivory carvings (90%) went to his shop in Hong Kong from where 95% were exported wholesale:



An ivory carving company that switched to carving mammoth ivory in the 1990s became famous for producing prestigious, detailed carved tusks.



A close-up of the previous mammoth ivory carving, called 'A Thousand Arhats'.

60% to the USA, 30% to Europe (especially France) and 10% to Japan. Initially he sold very few mammoth ivory items to the Chinese.

Perhaps the most famous mammoth ivory specialty company, with several outlets in Hong Kong and mainland China, which has publicized itself widely (unlike the two other outlets mentioned above), is called Prestige Crafts. The owner was born in Guangdong Province in 1958 and began learning to carve ivory in the late 1970s in China. He soon went to Hong Kong and became an apprentice ivory carver there. After two more years of training he started producing ivory carvings himself. Following the 1990 CITES ivory ban he switched to mammoth tusks to keep his business going. He produced some unusual and expensive items using the largest tusks carved with huge crowds of Chinese people. In 2010 one such carved tusk weighing 80 kilos was priced at HKD 8 million (USD 1,025,640).

Hong Kong customs had started recording

mammoth ivory imports as a separate trade entity in 1992 when 244 kilos were imported. The amount steadily increased, averaging 34,276 kilos per year from January 2007 through December 2010, of which 27,973 kilos (82%) were being re-exported annually to mainland China (Table 4). This was because the main Russian dealer found it much easier to trade with Hong Kong businesspeople, who had more experience with international trade (Martin and Martin 2010), and because the official paperwork was far less with no import taxes or VAT; also use of the English language was more widely used than on the mainland. During these four years, 94% of the mammoth tusks were coming to Hong Kong directly from Russia (Table 5). Demand among mainland Chinese customers visiting Hong Kong rose steadily as more people learned about the material and appreciated it more. The Hong Kong Chinese, however, did not develop an interest in buying mammoth ivory objects for themselves.

METHODS OF RESEARCH



A handful of past ivory carvers in Hong Kong now carry out repair work. They sometimes may carve mammoth ivory.

In December 2014 and early January 2015, Esmond and Chryssee Martin carried out fieldwork in Hong Kong. Lucy Vigne carried out follow-up work later in January. Data were collected from retail and wholesale outlets selling elephant and mammoth ivory items in the main tourist areas in Kowloon and the northern part of Hong Kong Island, where nearly all the ivory outlets are now located. Hippo ivory items were recorded on the few occasions they were observed. Information was obtained in Hong Kong on the number of items of the different ivories in each shop, the types of items, the approximate age of the objects, prices, nationality of customers, present status of the business, and vendors' views on the future.

Time was also spent updating ivory data from AFCD officials and visiting the Census and Statistics Department for mammoth tusk data, as well as learning from AFCD officials about the most recent law enforcement challenges and efforts to combat the illegal elephant ivory trade. Data were collected regarding Hong

Kong's ivory from the United Nations, ETIS and CITES. Old reports, such as the Hong Kong Ivory Manufacturing Workers General Union's 1976 survey, were studied to understand the history of the ivory industry.

Vendors and former ivory craftsmen were interviewed about the development of mammoth ivory carving up to the present, and their views about the future were recorded. Businesspeople and researchers in Hong Kong were interviewed for their knowledge on ivory, culture and economics in the region. Alex Hofford, consultant to WildAid, shared his ongoing findings regarding the licensing of ivory shops—data that he has been collecting since October 2014. We recorded particular ivory and mammoth ivory items for sale in the outlets, and took photographs where possible. We compared the same outlets that had existed four years ago for information on trends, as well as comparing changes in Hong Kong's ivory trade with those on the mainland over this four-year period.

RESULTS OF FIELDWORK

SOURCES AND WHOLESALE PRICES OF ELEPHANT AND MAMMOTH TUSKS

ELEPHANT TUSKS

According to ivory traders we interviewed four years earlier in Hong Kong and during this survey, there is no demand for raw ivory in Hong Kong, due to the lack of elephant ivory carvers. Therefore they say none is being imported, and thus there is no price for it. Two Europeans, however, were buying up old ivory tusks from European Union countries, which was legal to do for pre-Convention items, and some of this activity continues. These tusks were often obtained from private estate sales in Europe. The two dealers received proper CITES documents for the tusks, enabling them to be legally exported to Hong Kong for commercial use (Stiles, pers. comm. May 2015). The two dealers, who started their business in 2011, exported 1 to 2 tonnes a year to Hong Kong and mainland China. They preferred to sell their tusks mostly to Hong Kong rather than the mainland, and they were willing to sell them more cheaply in Hong Kong because bureaucratic delays were fewer. It takes 10 days to get tusks into Hong Kong as opposed to two to six months into mainland China. The price for these tusks was well below the black market price. Hong Kong dealers no doubt moved most of the tusks to mainland China as this was legal; once on the mainland, they could be processed and traded legally (Stiles, pers. comm. March 2015).

Other dealers were involved in sending similar legal ivory from the EU to Hong Kong. In 2011 and 2012, Hong Kong was the main importer in the world of this ivory, as based on official records. Hong Kong and mainland China, imported for commercial purposes 304 pre-Convention EU tusks from 2003 to 2013. This is 84% of the total number of whole tusks commercially imported into Hong Kong and mainland China legally, excluding those for commercial use from the so-called one-off auctions permitted for mainland China (not Hong Kong) by the CITES Parties that took place in southern Africa in 2008 (Mundy

2014). The significance of this is also reflected in the throughput of tusks in legal factories on the mainland. Between July 2009 and January 2014, of the tusks bought by China at the 2008 southern Africa auctions, 1,300 have been used up. Thus the 304 pre-Convention tusks are a sizeable injection, especially as they were larger than the average five-kilo of the 2008 shipment to China as they included old trophy tusks (Moyle, pers. comm. May 2015).

A second small legal source of ivory entering Hong Kong is from Zimbabwe for worked ivory only. This was because at the 10th Meeting of the Conference of the Parties to CITES in 1997, Zimbabwe's elephant population was downlisted from Appendix I to Appendix II and the country was allowed to export newly made worked ivory non-commercially with appropriate CITES documentation (Wijnstekers 2011). From January 2011 to December 2013, almost all of Zimbabwe's legally exported worked ivory went to mainland China: 9,521 kg, plus 3,442 ivory items. During this time, Hong Kong imported just two recorded items and 497 g of ivory from Zimbabwe (United Nations 2010–2014).



Most buyers of ivory items are mainland Chinese, but sometimes a dealer or vendor may approach a shopper from Africa to ask if he/she has any ivory.

MAMMOTH TUSKS

From 2011 through 2014 an annual average of 47,801 kilos of raw mammoth ivory was imported into Hong Kong, 82% directly from Russia (Table 5). Of this, 37,197 kilos (78%) was re-exported to mainland China (Table 4). In 2014 mammoth tusk imports into Hong Kong were 54,026 kilos of which 48,316 kilos came from Russia, then from the Netherlands (2,735 kilos) and Germany (1,810 kilos). Re-exports amounted to 43,812 kilos with 37,562 kilos going to mainland China, 4,037 kilos to Macau, and 1,137 kilos to the USA (Hong Kong Government 2015b).

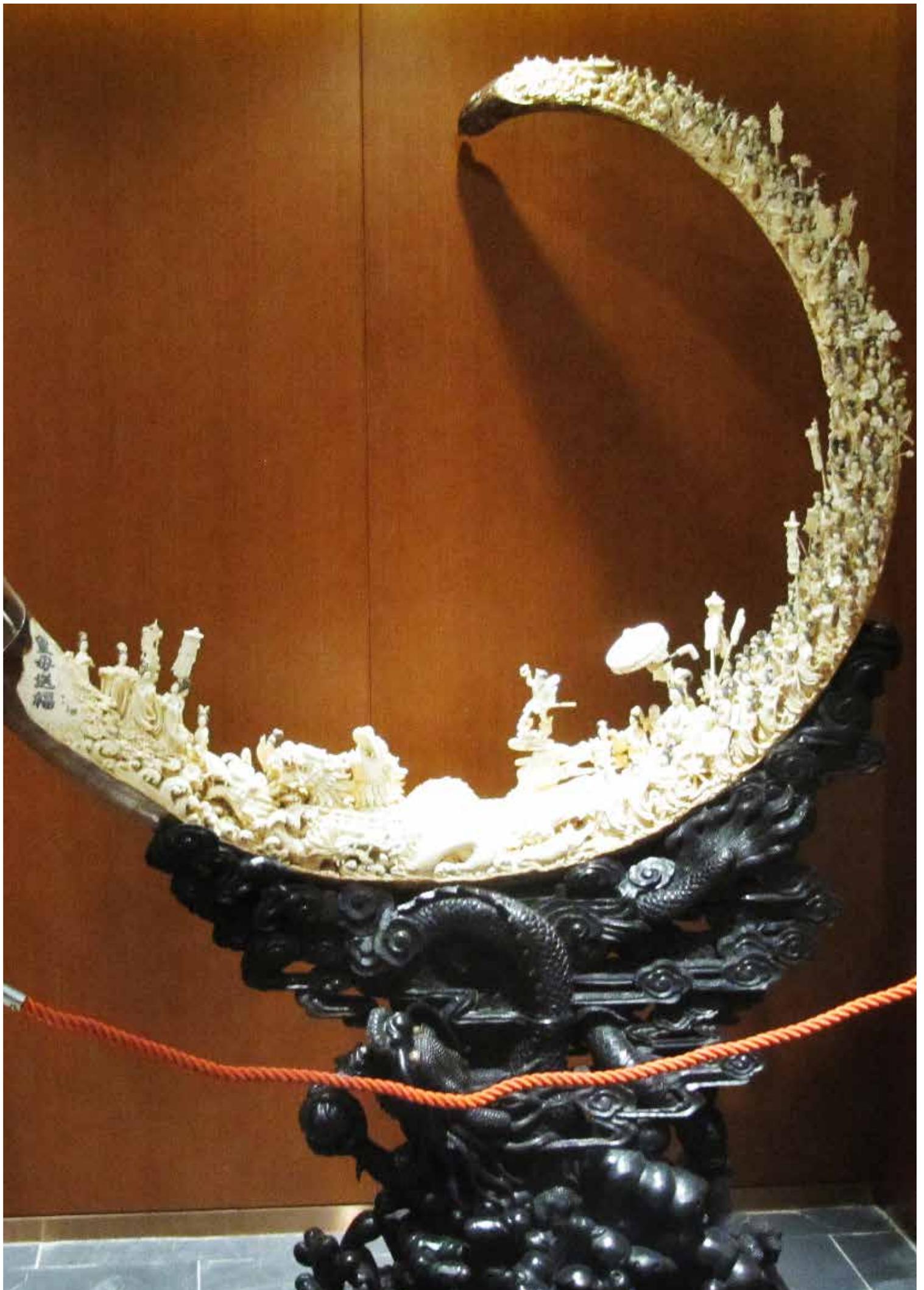
People collect large quantities of mammoth tusks in the summer out of the melting tundra and sell them to various traders in Russia. The main dealer, based in Moscow, in 2014 paid USD 700–800/kg for Grade A tusks, transporting them from the collection sites to Moscow. He then exported most of the tusks to Hong Kong and received from the importers (i.e. the import

price) in Hong Kong USD 1,200/kg for Grade A tusks. The average tusk weight for all the tusks that this Russian dealer sent to Hong Kong in 2014 was 30–35/kg (pers. comm. dealer, April 2015). The reasons dealers often send their tusks to Hong Kong rather than to mainland China, as for elephant ivory, are the lack of import duty in Hong Kong, the very little time-consuming bureaucracy involved, and the fact that Hong Kong businesspeople speak English well, compared with those on the mainland.

Once the tusks were in Hong Kong, their wholesale price, as sold to the manufacturers, varied in 2014 according to the quality of the mammoth tusks: Grade A, the top grade, averaged USD 1,500/kg, but excluded the extremely large tusks, which are more expensive; Grade B averaged USD 560/kg; Grade C, USD 400/kg; Grade D, USD 300/kg; and Grade E, of very low quality, like 'charcoal', one manufacturer said, cost only USD 150/kg.



When the best-quality raw mammoth tusks are imported, they are kept plain and simply polished for sale, paired up if possible.



Western visitors are usually most impressed with the large carved mammoth tusks; wealthy buyers come from all over the world.

CARVING

ELEPHANT IVORY

Vendors said there are few elephant ivory carvers in Hong Kong today and no full-time carvers, only a handful of repairers, as labour charges are cheaper on the mainland. The few remaining carvers carry out repair work on ivory items, according to some vendors, several of whom were former carvers.

MAMMOTH IVORY

Most mammoth ivory carving is done in mainland China, but there are 10–20 carvers in Hong Kong who also do this work, although not necessarily full time, according to vendors. Many mammoth ivory items are then returned to sell in Hong Kong as this is legal, unlike for elephant ivory. Most high-quality carvings are made from grades A and B ivory. Mammoth ivory can be carved into nearly all the same items produced from elephant ivory, except for very large magic balls and chopsticks. Magic balls of over about 30 layers are not good if made from mammoth ivory because it expands and contracts more than elephant ivory. Mammoth ivory chopsticks are not made either, as dealers say the tusk is too curved for cutting out many chopsticks. Also they crack too easily, and mammoth ivory is often considered dirty to use for eating food as the material has been buried underground for thousands of years, according to vendors.

One of the top master carvers in mammoth ivory is the owner of Prestige Crafts, Chu Chung Shing. He has received many awards for his mammoth ivory carvings and has helped to produce recently a large book about his works of art (Chu 2012). The longest tusk he has carved, which stands on the ground on a wooden base, is four metres; this length is extremely rare and valuable. Mr Chu supervises the work of his carvers when they are producing difficult and intricate items. He matches tusks of similar size and shape to form pairs and supervises their intricate carving to make sure they appear identical. His carvers work on large tusks at his factories on the mainland as this work is very slow and thus costly to complete; while for small items that are quicker and thus cheaper to produce, such as netsuke-type items, he has mammoth ivory carvers in Hong Kong.

His huge tusks with realistically carved humans and animals are bought by companies or private individuals to impress important people. As the publisher of his book states, 'If Mr Chu's works, especially the large-scale masterpieces, are placed in the lobby or hall, it will absolutely highlight the identity and status of the owner' (Chu 2012). This view is reflected in the name of his company, Prestige Crafts, as 'prestige' is what these very large carvings are all about. Mr Chu believes that carving elephant and mammoth tusks to a high standard is part of China's rich cultural heritage. He has received many awards, and plans to continue to promote around the world high-quality mammoth ivory items (Chu 2012).



Magic balls are a specialty of Guangzhou. Mammoth ivory cannot be used to carve the largest magic balls as the ivory is too brittle.

RETAIL OUTLETS, ITEMS, PRICES AND BUYERS

OUTLETS DISPLAYING ELEPHANT IVORY ITEMS FOR SALE

We found 72 outlets displaying 30,856 items named as elephant ivory for sale (Table 6). There were few large items, the vast majority being trinkets and small figurines under 50 g. Of the 72 outlets, 53 sold only elephant ivory items and 19 sold both elephant and mammoth ivory objects. Most of the shops selling worked ivory in Hong Kong are located in areas visited by foreigners: the southern part of the Kowloon Peninsula (especially in Tsim Sha Tsui) and on parts of Hong Kong Island, such as Central, North Point and Sheung Wan districts. Most outlets with ivory were in the Hollywood Road area. These ivory outlets are in some of the most sought-after locations with high rents. Most shops are on the ground

floor with display windows facing the streets to attract customers. The outlets visited were antique galleries, gift shops, hotel souvenir shops, jewellery outlets, mahjong shops, name seal outlets and specialty shops. Vendors said their outlets displayed elephant ivory items that were nearly all carved in the 1970s and 1980s in Hong Kong at the height of the ivory carving business in the city with some also carved during that period in mainland China. They claimed it was thus all from old stock and legal to sell. Ivory is a durable substance; products carved long ago can be circulated for years, thus what is seen today is not a measure of current production.

ANTIQUÉ GALLERIES

We counted 21 antique galleries, most of which were along Hollywood Road, with a total of 319 items of various ages; this was an average of 15 items per outlet. Most (93%) were figurines. The most expensive was a 19th-century 45-cm full ivory fan made in Guangzhou for the export market, selling for HKD 980,000

(USD 125,640), and a 45-cm Chinese-carved tusk, probably also from the 19th century, for HKD 350,000 (USD 44,872). Most ivory antiques were carved in China with a few carved in Europe and Japan, such as hairbrushes and boxes.

GIFT SHOPS

Fifteen gift shops, widely scattered, had 1,093 counted ivory items on display, an average of 73 items per shop. Most objects were jewellery (54%), especially pendants, earrings and rings; next in quantity were figurines. An unusual item was a 20-cm tall African head weighing 1 kg for

HKD 8,200 (USD 1,051). This retail price was even below the wholesale price for raw ivory in mainland China because there is little demand in Hong Kong or mainland China for African busts; it was the only such item we saw out of over 30,000 ivory objects.

HOTEL SOUVENIR SHOPS

Many hotels did not have shops, but there were four outlets in three hotels with ivory trinkets for sale: one in a luxury hotel, two in a popular Chinese-style hotel and one in a well-known chain hotel. There were 1,469 ivory items averaging 367 per shop. Most items were jewellery (65%) followed by figurines (32%). An

unusual item was an old name-card holder for HKD 120,000 (USD 15,385). Prices for similar items varied with some in the luxury outlets being double the price of those in others.

JEWELLERY OUTLETS

We counted nine jewellery retail outlets selling 587 ivory items, an average of 65 per outlet. Of these 47% were jewellery, pendants and charms being the most common; also there were 33% figurines and 12% chopsticks.

MAHJONG SHOPS

Three mahjong shops were seen selling ivory, but ivory mahjong sets were not on display, plastic sets being more popular. Mahjong is an ancient Chinese game, usually played with four people using 136 or 144 rectangular small tiles (as opposed to circular shaped pieces used for Chinese chess). During the Ching dynasty (1644–1911) there was an upsurge in the popularity of making mahjong sets, the tiles of which were made usually of bone and sometimes ivory. In the 19th century foreigners became major buyers of ivory mahjong sets (Burack 1984). Today nearly all the newly made

The mainland Chinese particularly like to buy ivory jewellery, not only because it is cheaper than on the mainland, but also because they trust that it is more likely to be authentic from the elephant according to vendors and buyers.

mahjong tiles are made of various synthetic materials.

These shops also had tall cylindrical glass containers with variously sized ivory chopsticks selling for relatively low prices to Chinese mahjong players in Hong Kong, for as little as HKD 1,780 (USD 228) a pair. Some of the more traditional, often older Hong Kong Chinese people like ivory chopsticks, hence their display in these outlets, vendors said. One mahjong shop had a variety of other ivory items for sale as well, including dice sets, polished tusk tips and figurines.



Upper row (L-R): Ivory jewellery items in a gift shop window. An ivory necklace in a hotel shop window. Bottom row (L-R): A luxury hotel souvenir shop displaying ivory items for sale. An outlet in Kowloon with a sign for mahjong gambling tools and ivory.

NAME SEAL OUTLETS

In one narrow road on Hong Kong Island in the Sheung Wan district we counted 21 name seal stalls lining a narrow pedestrian lane on both sides. Seven of these outlets sold ivory name seals totalling 420, an average of 60 so-called chops per stall. This was 91.5% of the ivory name seals seen for sale during our survey. On display were name seals made of a variety of substances, such as wood, buffalo horn, crystal, cat's eye stone, jade and other semi-precious stones, as well as synthetic materials. The stalls also sold inkpads, ink and other accessories. Engravers, some being the vendors, were available at the stalls or in the area to carve hallmarks on the chops on the spot or to be collected later if more detailed engraving was required. They also offered engraving Christian names in Chinese characters, which they copied from a book.

SPECIALTY SHOPS

Specialty shops in Hong Kong mostly sold elephant and mammoth ivory together, usually to the exclusion of anything else. Only five such outlets sold elephant ivory items alone (18,720 of the total) and eight sold elephant and mammoth ivory items (7,777 elephant ivory items). There were thus 13 specialty shops with elephant ivory selling in total 26,497 ivory items or 2,038 per shop on average. These outlets were selling 86% of all elephant ivory items we counted in Hong Kong in this survey. Of these, 76% were jewellery and 15% figurines and figures. Several specialty outlets had large quantities of ivory on shelves, sometimes in transparent boxes and bundled in plastic bags packed to the ceiling so only an

Cylindrical ivory name seals for personal use (2 x 6 cm) were offered for as little as HKD 600 (USD 77) as opposed to the larger-sized business name seals that were less common and much more expensive.

Ivory name seals are popular with the mainland Chinese and to a lesser extent with Japanese and South Koreans. The Hong Kong people generally prefer cheaper stone name seals as they sell on average for less than 10% of the cost of ivory ones. Mainlanders who cannot afford ivory commonly choose buffalo horn name seals, which are similar in price to stone ones. The Japanese and South Koreans who wish to buy cheaper name seals prefer cat's eye stone and crystal, which are similar in price to buffalo horn, according to these outlet vendors.

estimated count was possible. The vendors were usually more uncooperative than in the other outlets, not expecting to make a sale, as Western foreigners do not normally buy their items. Some outlets were rather seedy and dirty, often small and congested. Many of the tiny figurines resembled netsukes, about 5 cm long, similar to those carved of mammoth ivory. They were usually carved into the shape of animals, and there were small pendants, the smallest being charms or toggles. One shop had several polished tusks that were expensively priced: a 71-cm tusk of 3.1 kg was HKD 176,000 (USD 22,564) and a 78-cm tusk of 3.6 kg was HKD 220,000 (USD 28,205), but seeing large items was unusual.



A hallmark engraver finds from a book the translation of English names to make into Chinese characters for a name seal or chop.



Ivory specialty outlets were sometimes small and cramped, stuffed with ivory trinkets.

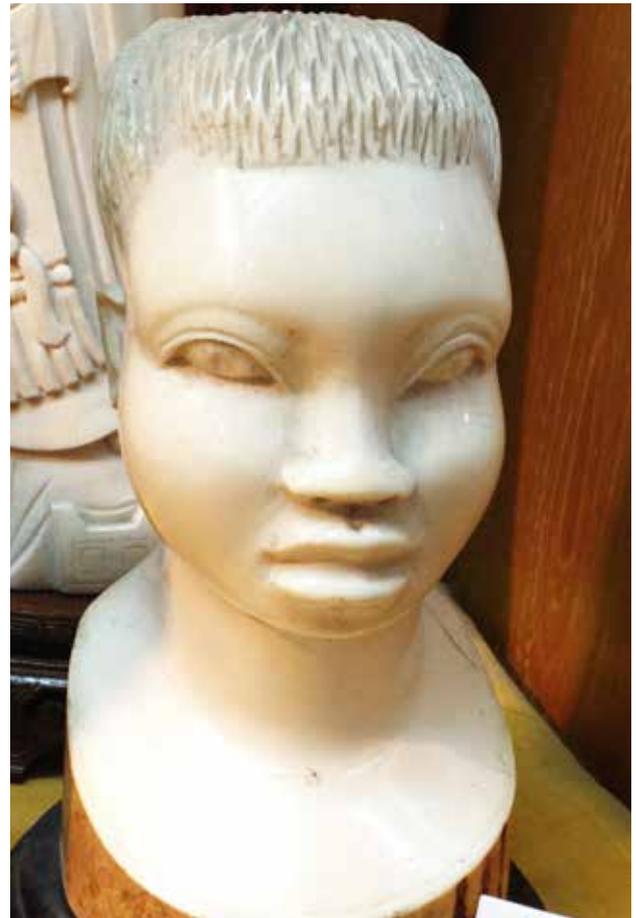
TYPES OF ELEPHANT IVORY ITEMS SEEN FOR SALE



Some ivory carvings for sale have been in stock in family businesses for years.

Only the best-shaped and unblemished tusks with tips intact are kept plain for the retail market and their prices are high because perfectly shaped tusks are rare. Most plain, polished tusks seen were small ones, which are easier to transport out of the country, hidden in luggage. Carved and plain polished tusks were thus seen in few outlets in Hong Kong, unlike in mainland China, where there was a dearth of illustrated (painted or with calligraphy) tusks that are becoming relatively more in demand on the mainland among the more cultured or well-read businesspeople. The lack of big tusks was partly because, being large, they attract people who are against this trade who may hassle the vendors.

The vast majority of items were mass-produced trinkets, especially a large array of jewellery and figurines, including 5-cm netsuke types (Table 7). According to vendors, items were to their knowledge from pre-1990 old ivory stocks that are legal to sell. Unlike in mainland China, the



African carvings of human busts or other figures are extremely rare, being unpopular with the Chinese.

items do not need an official identity card to prove the date of manufacture. Some outlets had many identical trinkets displayed en masse in plastic bags. Few ivory antiques were over a hundred years old, which is the American legal definition for an antique, or carved before 1947, which is the European Union definition.

Of the 30,856 ivory items counted for retail sale in this survey, the most common items were jewellery (Table 7). Less common items seen were cigarette holders, combs, dice, ear picks, hand exercise balls, magic balls, paintbrush holders, pen knives, pipes, shoe horns and snuff bottle spoons—items that were generally small and easily transportable. It was difficult to determine the age of most items as the common trinkets have remained the same style for decades. Frequently seen in outlets were elephant pendants with shiny gold new-looking decoration that appeared well preserved for items carved before 1990.

RETAIL PRICES FOR ELEPHANT IVORY ITEMS

Vendors determine the retail prices for their ivory items mainly according to the carving skill; the quality and size of the piece; what they paid for the object; the approximate market price at the time; whether it is an antique; the length of time they have displayed it; whether they want to sell it cheaply and replace it with faster moving and more profitable items; rents (usually based on location and size of the outlet); taxes and other expenses. Vendors may choose a price and decide on the final price depending on the customer's appearance, personality and bargaining skills. Vendors sometimes put a visible price tag on an item, and in some shops write a discount price in red for 'promotion' to encourage buyers. Others have prices and the type of ivory (mammoth or elephant) written on labels out of view on the base of the item to encourage buyers to look at the style rather than the price or whether it is made of mammoth or elephant ivory. Sometimes, with unpriced items, vendors write down the prices they quote onto a piece of paper so as not to forget what they said. Customers with little

bargaining skills may pay too much for items. Mainland Chinese are generally renowned to be skilled negotiators, examining items in detail for any faults and obtaining the best deal through persuasion and persistence. Often vendors offer customers a reduced price for more than one item and even a so-called wholesale price for more than about 10 of a type of item in order to encourage a bigger sale.

The most expensive ivory item seen during this survey was a Chinese-carved traditional pagoda 105 cm tall, made before the CITES ivory ban and priced at HKD 2.5 million (USD 320,513). The least expensive were thin snuff bottle spoons for HKD 38 (USD 5). There were not enough carved and polished tusks to get meaningful average prices, and the quality of carving varied for figures and figurines, causing a great range in prices. Prices also varied hugely according to the outlet, from those in expensive hotels to small stalls. A bangle on average was USD 519 (Table 8).



The labels give the item's weight. That is important for a buyer to know, as a tall thin figure may be lighter with less ivory used than a short squat figure.

BUYERS OF ELEPHANT IVORY OBJECTS

Mainland Chinese have become the biggest buyers of ivory objects in Hong Kong, according to vendors, and their numbers keep rising. In 1976 there were 4,223 mainland Chinese visitors (0.3% of visitors). In 1992 there were 1,149,002 (14.3% of the total). By 2000 the figure had shot up to 4,448,583 and by 2009, they numbered 17,956,731 (60.7% of the total number of visitors). By 2013 there was an astronomical increase to 40,745,273 mainland Chinese visitors (75% of the total); the total number of visitors had reached 54,298,804 with 53% being day visitors (Hong Kong Tourism Board 2014).

Visitors who spent a night in Hong Kong in 2014 were 57% females, with an average age of 39, who had been to Hong Kong before. Of these, 67% were from mainland China followed by 11% from South East Asia. The primary purpose of all visitors coming to Hong Kong is to shop (Hong Kong Tourism Board 2014).

The mainland-Chinese day visitors spend 91% of their expenditure in Hong Kong on shopping. In

2013 they spent the most on jewellery, followed by foodstuffs/alcohol/tobacco and electrical/photographic goods. In 2013 they spent USD 349 per capita, four times more on average than people from other geographical regions. For Chinese overnight visitors the main items bought in order of value in Hong Kong were jewellery, garments/fabrics, leather/synthetic goods, cosmetics/scents, and watches. In 2013 they spent per capita USD 1,146, again more than buyers from any other region (Hong Kong Tourism Board 2014).

Chinese mainlanders have become the biggest spenders on luxury goods in Hong Kong. With China's sudden and increasing economic boom, the mainlanders are enthusiastic to display their wealth by wearing famous brand labels. Luxury retail outlets, such as Hermes, Louis Vuitton, Prada, Ralph Lauren, Rolex and Tiffany, are frequently seen in the main shopping areas. Mainland Chinese come to shop because most items, especially luxury imported goods, are cheaper, with taxes being much higher in mainland China. Furthermore, many believe



Most buyers of ivory items are Chinese from the mainland, and among them, women are the most frequent customers for all luxury goods.



Sometimes men buy ivory jewellery as presents, as at this ivory specialist outlet.

that Hong Kong's luxury items are more likely to be genuine compared with many fakes back home. Demand is sometimes so great that the shop employees have to limit the number of Chinese entering their premises, asking them to join a long queue in the street. In the hotels, mainland Chinese can be seen in the lobbies removing labels, packaging and other evidence that they have bought new items in order to reduce the possibility of paying taxes on their return to mainland China.

All vendors who gave us information about ivory sales said well over 90% of the buyers were Chinese from the mainland. Hong Kong Chinese are not interested in ivory, except sometimes chopsticks and very small items, vendors said. Bangles, chopsticks, cigarette holders, name seals and pendants made up 55% of the total number of ivory items seen for sale in Hong Kong. They are small and easy for buyers to smuggle out in luggage along with other jewellery and figurines. Many of the more rural people may have not seen ivory before



In hotel lobbies, mainland Chinese can be seen busily removing packaging from their purchases to avoid being caught with new items and charged at customs.

visiting Hong Kong and like to have the chance to buy trinkets when they visit. The tour guides, knowing ivory displayed in shops is cheaper in Hong Kong, bring their clients to see outlets selling it. Some customers who have been to Hong Kong before also know about ivory being cheaper there and return to buy more ivory items, sometimes to resell.

We saw few customers in the retail shops, however, and the small handful of Chinese people who actually bought any ivory chose bangles and pendants. Women tend to buy bangles for themselves as they have to test the fit on their wrists; men like to buy pendants for their girlfriends as they can be of any size. Customers usually prefer elephant ivory jewellery, and unlike on the mainland where shops often sell mammoth and elephant ivory jewellery beside each other, confusing the customer, they can be more confident in Hong Kong that the items they are offered are elephant ivory as there is very little mammoth ivory jewellery offered in Hong Kong.

OUTLETS DISPLAYING MAMMOTH IVORY ITEMS FOR SALE

We found 27 shops displaying 20,583 items named as mammoth ivory for sale (Table 9). Nineteen of them also sold elephant ivory. Thus eight sold only mammoth ivory, no elephant ivory. The outlets were on Hong Kong Island (Central, North Point and Sheung Wan districts) and on the Kowloon Peninsula, as for ivory, with these being the main tourist areas in Hong Kong.

ANTIQUÉ GALLERIES

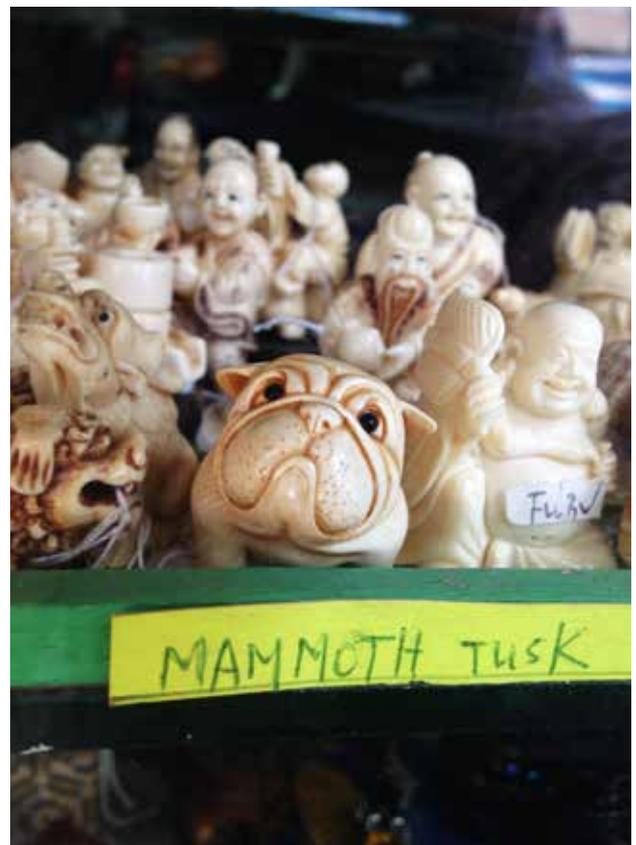
Only three antique shops were selling mammoth ivory items; all 234 items were figurines, an average of 78 per outlet. They were being sold as unusual items, being made

of mammoth ivory, but not as antiques as all the mammoth ivory items seen in Hong Kong were carved after the 1990 CITES ban.

DEPARTMENT STORES

Four department stores that were branches of the Chinese Arts and Crafts and also the Chinese Goods Centre Ltd, had sections that sold mammoth ivory. They were fairly large stores, selling all types of Chinese crafts, clothing and other goods. The four stores displayed 232 mammoth ivory items, including human and animal figures or figurines and some carved tusks. One 90-cm tusk was HKD 680,000 (USD 87,179). Very large tusks were

absent as they tie up a lot of money and their turnover is slow. These two outlets had stopped selling elephant ivory due to pressure in 2014. Another two companies (Wing On Department Store and Yue Hwa Products Emporium) had also stopped selling elephant ivory items in 2014 due to pressure and had stopped selling mammoth ivory items as well (Kao 2015; *South China Morning Post* 2015).



These small ivory figurines with mammoth tusk labels were for sale in Hollywood Road, famous for its antique galleries. Signs saying elephant ivory are rare to avoid negative reactions from tourists.

GIFT SHOPS

Five gift shops had 1,122 mammoth ivory items, an average of 224 per outlet, nearly all netsuke types, figurines and pendants, the smallest being charms and toggles. The outlet selling the most items (especially netsukes) was near Hollywood Road; the next was selling small netsuke-like carvings and toggles in a busy pedestrian walkway used by commuters heading for the metro. Elephant ivory jewellery

HOTEL SOUVENIR SHOPS

Three souvenir shops in hotels displayed 226 mammoth ivory items, 75 items per outlet on average, mostly figurines and pendants. One shop was in a luxury hotel so the prices were higher. Another was in a hotel popular with mainland Chinese shoppers and had many mammoth ivory items on shelves and in table cabinets mixed with elephant ivory and hippo ivory items, all behind glass, making it difficult to identify the raw material for the survey as it

was also displayed in the window. The outlet with the next largest number of items was in a popular tourist area and displayed mammoth and also ivory netsukes and figurines on separate shelves, as well as bone and resin figures. All the gift shop vendors clearly explained which items were made of which materials.

was too time-consuming for the vendor to go through each item naming the type of ivory. The vendor in the smallest shop in a well-known hotel chain pointed to mammoth ivory netsuke figurines and some elephant ivory bangles in the window display. The other trinkets inside the shop were elephant ivory, she said, not mammoth ivory, as the elephant ivory trinkets are generally more popular as souvenirs among Chinese visitors than mammoth ivory items.



This gift shop had a large number of mammoth ivory netsukes on display for sale.



A hotel souvenir shop displays small mammoth ivory figurines in the window.

SPECIALTY SHOPS

We found 12 specialty outlets selling a total of 18,769 mammoth ivory objects or 1,565 per outlet. Four were selling mammoth ivory alone (with 2,922 items) and eight were selling mammoth and elephant ivory items (with 15,847 mammoth ivory items). These specialist outlets displayed 95% of the total number of mammoth ivory objects surveyed in the retail outlets. About two-thirds had very large mammoth tusks for sale, some carved and some plain, as well as carved figures in a large range of sizes dominating the shelf space, down to small figurines. There was little jewellery (just less than 3%). Some shops carrying mammoth ivory

carvings alone had well-decorated large display rooms with modern lighting, comfortable chairs and carpets. The best ones had good marketing strategies, using pamphlets, books and DVDs as well as posters about mammoth ivory and carvings. Some outlets had special displays of their most expensive items, bringing attention to the magnificence of the pieces, especially the largest plain tusks and the most intricately big carved tusks. These were in the Prestige Crafts mammoth ivory specialty shops; by 2012 there were several of these outlets in Hong Kong, Guangzhou, Shanghai and elsewhere, expanding their locations.



A large selection of often unique carvings can be seen in mammoth ivory specialist shops.

TYPES OF MAMMOTH IVORY ITEMS SEEN FOR SALE

Figurines and figures comprised 97% of the mammoth ivory items seen for retail sale in Hong Kong in 2014/15; pendants were 1%, necklaces and prayer beads another 1%, and 1% were miscellaneous items. Many of the figures are carved from tusk pieces with some of the brown outer tusk layer purposely visible to identify the item as mammoth ivory. The larger pieces are often unique carvings of animals and humans figures, produced in great detail to encompass and incorporate any dark streaks and cracks or fissures into the design of the carving. The smallest, usually from whiter ivory pieces, were charms and toggles; next were netsuke-type animals, sometimes kept in bulk on shelves in transparent bags as there

were so many. These mammoth ivory figurines, when carved from the outer part of the tusk, are browner from soil deposits sinking into the tusk compared with those carved from the inner part of the tusk, which are whiter, being protected from the soil. There was very little jewellery, although some outlets had beaded necklaces and bracelets designed for Buddhists as prayer beads, usually numbering 27 or 108 beads and recognizable by the larger guru bead at the end.

The most valuable fully carved tusk seen in a retail outlet, but not priced for sale at the time, was a gigantic carved tusk over 4 m long with 1,000 arhats (Buddhist saints of high rank). This tusk was named Thousands of Arhats for

Our Prosperous Country. About 500 kilos of mammoth ivory were used to make it (Chu 2012) and the finished carving weighed 158 kilos. Ten

carvers worked on it for 10 years; most of the carving was done in mainland China, supervised by the owner, who lives in Hong Kong.

RETAIL PRICES FOR MAMMOTH IVORY ITEMS

Vendors determine the prices of their mammoth ivory carvings in a manner similar to that for ivory items. Obviously those items that do not sell will be reduced in price, and some vendors are more keen or desperate to sell than others, if they have smaller outlets or cannot afford to tie up capital in a lot of expensive stock. Often the carvings from the browner ivory on the outer part of the tusk are less expensive than the pure white carvings from the inner portion of the tusk that many prefer as it can look identical to elephant ivory, apart from a close-up view of the circumference of the tusk when the cross-hatchings can be seen (more acute angles being mammoth ivory). For small netsuke-like figurines that appeared similar to elephant ivory, prices were often much the same and were more dependent on the carving skill and style, some vendors said. Often the buyers do not query which items are made of mammoth and which of elephant ivory when they appear together on a shelf or look identical in the cabinet—all they want is an

ivory item. These buyers choose whichever so-called ivory item they like best at the price they want to spend.

Prices are rising for the newer items, some vendors said, as raw mammoth ivory is getting more expensive, and now some mammoth ivory figures are more expensive than elephant ivory figures of old stock. The highest prices by far are for the largest mammoth tusks. The most beautiful intact tusks are not carved. A 75-kilo unblemished plain polished tusk 200 cm long was selling for HKD 25 million (USD 3,205,128). The most expensive tusk seen for sale was a carved 90-kilo tusk for HKD 28,000,000 (USD 3,589,743). A 60-kilo carved tusk was HKD 14,500,000 (USD 1,858,974). A 35-kilo carved tusk was HKD 2,800,000 (USD 358,974). Prices generally go down, from larger to smaller tusks by weight and also when priced by length. This is also the case for figures and figurines that decline in price with decreasing size (Table 10).



Small animal carvings such as these charms or toggles are one of the most common mammoth ivory items seen in the outlets.

BUYERS OF MAMMOTH IVORY OBJECTS

Vendors said that mainland Chinese have been increasing their interest in mammoth ivory in the last few years and nowadays make up at least 80% of their customers. They now tend to prefer the whiter mammoth ivory over the browner items. Other buyers include Russians, Taiwanese and some Western Europeans. The Russians appreciate the material, knowing it comes from Russia, and they like the detailed and skilled Chinese workmanship. Such pieces are rarely produced in Russia. Taiwanese, many of whom originated in Fujian Province in China, where there has long been a tradition of carving, are aware of the growing value of mammoth ivory carvings and are often wealthy enough to afford some of the best. From Europe, the French and Spanish were more frequently named as buyers. Hong Kong Chinese have not developed a taste for mammoth ivory carvings, except as occasional gifts for foreigners. Some of the buyers of the most expensive and elaborate carved tusks are large companies, such as casinos, who display expensive items for fame and prestige.

It was interesting that so few mammoth ivory

trinkets and jewellery were for sale in Hong Kong, when compared with mainland China, as in Hong Kong there are so many small elephant ivory items for sale. Due to the lack of restrictions on taking out mammoth ivory items, buyers can choose large mammoth ivory carvings to bring home to their countries, unlike with elephant ivory carvings that by law must stay in Hong Kong. Many, especially Western customers, choose the authentic-looking larger items with the cracks and discolouration that are typical of mammoth ivory, admiring this ancient material from an extinct species. Often carvers leave some of the brown outer layer of the tusk's edge that shows the item is made of mammoth ivory. Increasing amounts of such items are exported wholesale to outlets abroad as the customer base expands. The big reputable mammoth ivory dealers from Hong Kong are careful not to taint their reputation or be caught at customs fiddling the system. They export mammoth ivory items and do not mix them with elephant ivory items. Customs have not yet come across the difficulty of ivory items being exported under the guise of mammoth ivory items.



Most items are carved for Chinese taste with Buddhist influence, but some items such as these crosses are carved for buyers who usually are Catholic.

SUBSTITUTES

The most common alternative material for ivory seen for sale in Hong Kong was hippo teeth. Although the hippopotamus is on Appendix II and an export permit is required from African countries for its products, vendors said the hippo ivory items seen for sale in Hong Kong were from old stock. Neither imported nor local carvings of hippo teeth are known today because sales are too slow. Adult hippos have 36 teeth with the lower canines being the largest and the most sought after for carving. The teeth are dense, fine grained and strong with a hard coating of enamel, making them difficult to carve. They also crack easily before they are carved, during processing and even afterwards, making them less popular and less expensive (Shell 1983).

The seven outlets surveyed (the same seven as in 2011) were selling 1,146 hippo ivory objects, which were usually small and poorly carved (164 per outlet). The majority were seen in a

specialty outlet and a gift shop. About 95% were small human and animal figurines of 4–6 cm at an average price of USD 45 each. An elephant ivory item of equivalent size, for comparison, was on average USD 507 and for mammoth ivory USD 478. The number and type of hippo ivory items displayed have remained much the same since 2011, with little rise in price, unlike elephant and mammoth ivory items, which have risen in price substantially over this period. The most expensive hippo ivory object seen during this survey, at USD 1,723, was a 22-cm carved hippo tooth in a luxury hotel outlet with human figures including copulating human couples carved into the tooth.

Some outlets sold other types of cheap substitutes to tourists, especially figurines made of resins. There were also some larger figures made of bone pieces stuck together on wood that were made in mainland China.

VENDORS' ATTITUDES

Almost all vendors were Hong Kong Chinese and some could speak English. In many of the outlets it was the owners who were selling ivory items. Some of the bigger dealers were uncooperative, with three asking us to leave their shops and one querying if we were 'activists'. Usually, vendors asked if we lived in Hong Kong and clearly warned us that ivory items could not be taken out of Hong Kong, unlike mammoth ivory items. A couple of shops had signs in the windows for tourists saying 'mammoth ivory' referring to carved figurines on display that turned out to be elephant ivory. This could also be a way for the vendors to feel safer from hostile customers with the growing trend against ivory. A few of the antique galleries had European owners who were also the vendors, but no antique outlet had a sizeable collection of ivory items. In general, and far more so than in mainland China, vendors in the various outlets were honest in naming their elephant ivory items and mammoth ivory items correctly, despite elephant ivory often being in the same

shop and easily confused for Grade A white and unblemished mammoth ivory items. Sometimes the type of material was named on the label underneath the item with the price so the vendor could check each item, if they were inexperienced and did not know. In two specialty outlets selling both elephant ivory and mammoth ivory items, the sales girls correctly said the jewellery and trinkets were elephant ivory but when the owner was present, on two occasions he claimed to Western customers that the same items were made of mammoth ivory; this would mean if these tourists were to buy bangles, for example, thinking they were mammoth ivory, they would leave the country innocently with elephant ivory bangles and could be arrested in their home country. Another vendor, hoping for the sale of an elephant ivory item, explained how to smuggle it out of Hong Kong, such as by hiding it in a black plastic bag in one's luggage to avoid detection. One vendor said that smoking small netsuke-type ivory figurines a light brown would make them appear as mammoth ivory,



These carved hippo teeth were wrapped in plastic for protection from desiccation and cracking.



Some vendors nowadays are concerned about being hassled for selling Ivory.

allowing them to be exported supposedly legally, sometimes to Japan as well as mainland China.

Vendors explain to customers that there is no problem taking out mammoth ivory items and bringing them to one's home country (excluding India), although a vendor in one specialist shop selling mammoth ivory, in trying to encourage a sale said she would give a CITES certificate

for a mammoth ivory item, although there is technically no such thing. Vendors selling mammoth ivory were more willing to assist us, compared with vendors selling elephant ivory items, as more Westerners buy mammoth ivory than elephant ivory so they had greater hope for a sale. Vendors selling only mammoth ivory do not get bothered by people who are against the ivory trade.

ELEPHANT IVORY IN THE FUTURE

Vendors were concerned about the public outcry against the retail sale of ivory products in Hong Kong in 2014. The four large department store companies that discontinued their ivory sales in 2014 following pressure from 'agitators', had to remove several thousand items; one owner took away his items to sell in two other shops of his (Hofford, pers. comm. 2014). Members of small family businesses are worried that their outlets may also soon have to close down if strong pressure is put on them. Ivory vendors are generally nervous about the future in selling ivory items and are aware of the growing numbers of negative press articles in Hong Kong.

Vendors fear also that the recent sharp increases in rents on Hong Kong Island, especially in the

Hollywood Road area, will force them to put retail prices up, reducing the number of customers, which would then narrow the price advantage that Hong Kong presently has compared with mainland China. Some shop owners say they can get a higher rent for their shop by letting it to contemporary art galleries or restaurants instead. Vendors are also concerned about possible dwindling future demand for ivory from the mainland Chinese if ivory becomes less fashionable in Beijing and elsewhere in China. Then demand may fall, forcing mainland Chinese dealers to reduce the price of their ivory items, thus narrowing the present price differential between Hong Kong and the mainland. This could then result in fewer mainland Chinese buying ivory items in Hong Kong.

MAMMOTH IVORY IN THE FUTURE

Vendors in the mammoth ivory specialist outlets are much more optimistic than their elephant ivory counterparts regarding their future business prospects. One retailer has even displayed a poster in his window guaranteeing to customers: 'Any product purchased over HKD 100,000 [USD 12,821] may be returned in two years at 70% of invoice price on production of original certificate of valuation'. Owners of these specialist shops can afford to keep their outlets looking luxurious, with their businesses obviously doing well and impressive showrooms drawing in curious passersby.



Vendors selling mammoth ivory see a bright future for their business.

DISCUSSION

ELEPHANT IVORY TRENDS IN HONG KONG

In December 2010/January 2011, our count found 62 retail outlets selling elephant ivory items in the downtown tourist areas. During this more in-depth survey of the same area, the figure rose to 72 retail outlets selling elephant ivory. This outlet number is close to the total, excluding a handful of small outlets that were closed during the survey (Hofford, pers. comm. January 2015). Thus, the numbers of retail outlets have remained roughly stable over this four-year period. The previous survey found 33,516 ivory items, compared with 30,856 in this survey. The number of ivory items counted on display has dropped, although this cannot be considered statistically significant given the large variation in numbers of items in stores (Moyle, pers. comm. May 2015). There is continuing political pressure that closed the several big outlets in department stores in 2014, six of which had been surveyed in December 2010/January

2011 with 4,374 ivory items counted (and 1,169 mammoth ivory items). The department stores that had removed their elephant ivory items, the Chinese Arts and Crafts, Yue Hwa China Products Emporium, Wing On Department Store and a fourth (not in our previous survey) called the Chinese Goods Centre Ltd (Kao 2015; *South China Morning Post* 2015) were pressurized more than the family outlets.

Out of 62 outlets seen in our previous survey four years earlier, only 25 were still displaying ivory in 2015; the number of their ivory items on display was roughly the same—13 with fewer than 100, 7 with 100–1,000 and 5 with over 1,000 items. Apart from those in department stores that had closed down, the main shops selling ivory items have mostly remained active while smaller outlets with only a few ivory items may come and go, although there were two new shops with ivory items displayed



Shop windows often display alluring ivory carvings to attract customers inside to see more carvings.



The texture of elephant ivory enables faces to be carved in great detail and its whiteness is particularly attractive to the Chinese.

for sale that numbered over 1,000 that had connections with one of the closed department store outlets.

There were changes in outlet types selling ivory during those four years. By early 2015 there were 10 fewer antique galleries counted. Over the four-year period, the average number of ivory items per antique shop had also declined from 27 to 15. The number of antique galleries, including those selling ivory, have declined due to higher rents and fewer antiques available. Vendors said that mainland Chinese customers have been buying up ivory and other Chinese-made antiques in Hong Kong, depleting stocks, as is the trend with Chinese antiques worldwide.

The number of jewellery shops found with ivory increased from one to nine. Jewellery remains the most numerous type of ivory item seen for sale in Hong Kong, then small figurines and then chopsticks. Chopsticks and name seals appeared stable in price on average because during this survey two expensive hotel outlets no longer sold these items, and cheaper outlets selling these items (mahjong shops and name seals stalls) were surveyed this time, and

not before, bringing the average price down. Turnover in the two luxury hotels that sold name seals before may have been too slow to make a profit, but the small stalls have continued to prosper as the rents are much cheaper. More gift shops selling small amounts of ivory items were seen during this survey than previously due to extra outlets being discovered thanks to the combination of our work on outlet locations with that of Alex Hofford (pers. comm. December 2014). Prices for bangles have about doubled, cigarette holders have doubled and pendants have gone up sixfold in both Hong Kong dollars and US dollars (Table 11).

The outlets displaying the most ivory items were the specialty shops. Over the four-year period seven such outlets had remained with the same name and location, selling over 300 ivory items each, the numbers being 25,668 in the previous survey and 22,686 in this survey. This was a slight decrease but not as much as one would expect with the vast and growing number of mainland Chinese visitors; the vendors obviously replace the items, still showing little sign of running out.

MAMMOTH IVORY TRENDS IN HONG KONG

From December 2010/January 2011 to December 2014/January 2015 the number of retail outlets selling mammoth ivory items increased very slightly from 24 to 27; there were more antique outlets, gift shops and specialty outlets surveyed with mammoth ivory than before. Those retail outlets with only a few items (fewer than 30) may come and go, but the larger had mostly remained active. Department store outlets with mammoth ivory items declined because of pressure against their elephant ivory sales in 2014. Of the 24 outlets selling mammoth ivory items in the previous survey, 16 were still doing so in this survey with an increase in items from 11,044 to 15,062; this shows business is good for these outlets.

The total number of mammoth ivory items counted increased during this period from 13,950 to 20,583 (excluding single beads that are not complete items and were not commonly seen in this survey). In reality, the latest figure is perhaps a bit lower as at two large outlets many trinkets were named as mammoth ivory items by the vendor when they were actually

elephant ivory. Whether with increasing pressure against the ivory trade more vendors will pretend to those they fear are activists or journalists or officials that their ivory items are mammoth ivory, using this legal material as a smoke screen, remains to be seen and adds to the complexity of monitoring.

In the previous survey, figurines and figures made up 99% of the mammoth ivory items on display and that amount has remained similar in this survey at 97%. The specialty shops displayed 95% of all items in both surveys with the dominant outlets also remaining the same. The outlets overall sold little mammoth ivory jewellery, which is rarely offered for sale in Hong Kong unlike on the mainland, as it cannot compete with the large amount of elephant ivory jewellery for sale there. The notable change is that retail prices have soared over this four-year period for some items. For example, a 5-cm pendant increased fivefold, from USD 82 to USD 410 on average. A 30-cm carved tusk increased on average four and a half-fold, from USD 6,923 to USD 30,880.



The variety of large mammoth ivory carvings continues to be immense, attracting many different types of collectors.

COMPARISONS WITH MAINLAND CHINA'S ELEPHANT IVORY TRADE

Hong Kong's 72 outlets today, with 30,856 elephant ivory items surveyed, compared with our study in Beijing seven months earlier with 156 outlets surveyed selling 6,272 items, shows that although the number of outlets in Hong Kong is fewer, the outlets carry a lot more elephant ivory objects. In December 2010/January 2011 in Hong Kong and Guangzhou the most common types of ivory items displayed for sale were similar: 63% and 65% respectively for jewellery, and 23% and 14% for figurines and figures (Martin and Martin 2011; Martin and Vigne 2011), although figures for sale were on average of larger size in Guangzhou than in Hong Kong. Four years later the same types of ivory objects dominated sales in Hong Kong and Beijing, 57% and 60% respectively for jewellery, and 31% and 17% respectively for figurines and figures (Vigne and Martin 2014). Again, the ratio of small items was much higher in Hong Kong compared with the mainland where 20% of the legal ivory items offered for sale were over 100 g each (Moyle, pers. comm. May 2015).

In Hong Kong as there is no legal requirement for an ID card for each item, large amounts of small trinkets in specialist outlets are sometimes lumped together in transparent bags and containers to fit into the often cramped shops, in contrast to Beijing's specialty outlets where most shops have carefully laid-out varieties of jewellery and other trinkets in spacious display table cabinets, especially in the increasingly prosperous new legal outlets. In Hong Kong four years ago and today, sometimes bags-full of netsuke-type animal figurines fill shelves to the ceiling, unlike in Beijing where fewer and larger figures, commonly of Gwan Yin, the Buddhist female goddess of mercy, are displayed on shelves behind glass. Hong Kong's number of items seen for sale is thus much higher with 30,856 in 72 outlets counted in this survey compared with 6,272 in Beijing in 156 outlets counted in May 2014. In Hong Kong, only a few of the main specialist outlets display a sizeable array of ivory items (mostly trinkets) while mainland China's larger legal, specialist outlets mostly have a much greater variety of ivory objects of all sizes.

Hong Kong ivory items were much less expensive than in Guangzhou in our December 2010/

January 2011 surveys: bangles and cigarette holders were about a third of the price and pendants about 35% less (Table 11). This Hong Kong survey, when compared with our May 2014 Beijing survey, showed that Hong Kong's items were less expensive for items on display: bangles were a quarter of the price, cigarette holders and name seals about a third, and chopsticks, pendants and rings were at most half the price on average. The reasons for the significant price differential are several. Foremost, a significant number of expensive legal specialty outlets in Beijing charge much higher prices for their items. Most ivory items in retail outlets in Beijing are sold in these large plush shops, often in expensive new shopping malls with high rents. These outlets have modern lighting and expensive display cabinets of high cost compared with many of Hong Kong's smaller, scruffier and more run-down outlets, some of which are not rented but owned, which keeps down overhead costs, enabling the owners to sell items less expensively. The fact that official ID cards for ivory items are not legally required in Hong Kong, unlike on the mainland (where they are called collection cards), makes it possible to charge less for items in Hong Kong as vendors avoid the time and effort that bureaucratic paperwork requires for the legal ivory items in Beijing.

In Beijing a parallel trade occurs in known illegal ivory items on display in outlets not officially recognized that does not occur in Hong Kong. Such items in Beijing, however, were far less frequently seen on display for sale than the legal, much more expensive items that thus did not reduce the average high survey price for trinkets seen in Beijing.

Furthermore, some vendors in Hong Kong say they want to get out of the ivory business, what with the negative worldwide attitude today regarding ivory sales. For the 2013/2014 registering period vendors declared to the Hong Kong government just over 100 tonnes of pre-1990 private ivory stock remaining, which some vendors say they are selling at more competitive prices compared with mainland China to reduce their stock more quickly. Pressure has been mounting since 2013 on owners of large ivory shops to get out of the



Figures above 30 cm in ivory were rare in Hong Kong.

ivory business, which some have voluntarily done without receiving any financial compensation (Hofford, pers. comm. September 2014).

Another reason for the lower prices in Hong Kong, vendors said, is that most items were made some years ago when the raw material was much cheaper. Many were crafted before 1990 when the import price for a 5–10 kg tusk was only around USD 180/kg (Martin and Stiles 2003). Black market raw tusks in mainland China that weigh 1–5 kg have tripled in wholesale price from 2010 to 2014 in mainland China to USD 2,100/kg and officially sold tusks have also risen in price (Gao and Clark 2014; Vigne and Martin 2014). In Hong Kong, vendors said there is no demand for raw ivory for carving so they could give no price for it.

In mainland China, 2014 was not a good year for luxury products because demand weakened due to a decline in consumer confidence and a



Distinguishing between elephant and mammoth ivory can be extremely difficult for earrings and other small items.

decrease in economic growth rates. Perhaps this gave an incentive for mainland Chinese to shop for such items in Hong Kong, where they are cheaper.

Labour costs for vendors and other staff are still higher in Hong Kong, but as salaries are likely to rise relatively faster in mainland China, the differential in prices for items may increase more greatly with Hong Kong's ivory items selling for even less compared with mainland China. The future of the Hong Kong ivory business depends firstly on the large price difference between ivory items displayed for sale in shops in Hong Kong and the mainland, secondly with continuing strong demand for ivory in mainland China and thirdly with the mainlanders being permitted by their government to continue to visit Hong Kong in large numbers as they can do today. The future also depends on how long Hong Kong stocks last and how much longer dealers will be allowed to sell them.



Larger carvings can be produced from a mammoth tusk rather than on smaller elephant tusks, and are popular also on the mainland in the specialist shops.

COMPARISONS WITH MAINLAND CHINA'S MAMMOTH IVORY TRADE

Hong Kong's 27 outlets today, with 20,583 mammoth ivory items surveyed, and Beijing's 43 outlets surveyed in 2014 selling 3,747 items, show that although the number of outlets is fewer in Hong Kong, they carry significantly more mammoth ivory objects (many being netsuke figurines) than those in mainland China.

Both four years ago and today, the variety of mammoth ivory items in Hong Kong was also much smaller than in the mainland China cities surveyed. In December 2010/January 2011, according to our survey work in Hong Kong and Guangzhou, the most common types of ivory items displayed for sale were figurines and figures of many shapes and sizes: 99% in Hong Kong and 45% in Guangzhou. Hong Kong thus had few other types of mammoth ivory objects, but Guangzhou had a great variety with 26% being various items of mammoth ivory jewellery. The sizes of items ranged in both cities from very large tusks to very small toggles and charms. Four years later the same types of ivory objects were still selling in Hong Kong and Beijing, but there were proportionately far fewer pendants and other types of jewellery named as mammoth ivory in Hong Kong than in Beijing: less than 3% compared with 62%,

and far more figurines (including netsukes and charms) in Hong Kong: 97% of the items on display compared with 46% in Beijing (Vigne and Martin 2014). Both cities had a huge range in sizes of mammoth ivory objects displayed for sale, from large tusks to small charms. This of course is because mammoth ivory is legal to export and does not thus have to be small to hide in luggage.

There were not enough prices recorded for common trinkets in Hong Kong in 2011 to compare with Guangzhou but 4–5 cm figurines were about USD 277 on average in Hong Kong and USD 284 in Guangzhou. In this latest Hong Kong survey they were on average USD 478 compared with USD 676 in Beijing in May 2014. Although most items for sale in Hong Kong are carved on the mainland due to much lower wages and even though items then have to come back to Hong Kong, the prices are generally lower in Hong Kong's shops than on the mainland; this is mainly because there is no VAT or other taxes on items, as in mainland China. Larger items, especially elaborately carved tusks, are more expensive in Hong Kong only if a carver is Hong Kong-based due to the higher cost of labour.



Some famous mammoth ivory carvings, as seen in Hong Kong mammoth ivory specialist shops, are the same in certain specialist shops on the mainland.

LAW ENFORCEMENT CHALLENGES IN HONG KONG

ELEPHANT IVORY

Law enforcement is a growing challenge in Hong Kong, with ivory having become in greater demand in mainland China. The big challenges are the following: illegal large ivory shipments from Africa via Hong Kong destined for mainland China; illegal ivory passing through traders in Hong Kong and on to mainland China; and ivory items being bought in Hong Kong's retail outlets by Chinese mainlanders to smuggle home. Serious smuggling by these three means continues.

Customs must carry out inspections at the ports, airports and international land border into mainland China. Hong Kong, Macau and mainland China have three CITES management authorities that separately conform in the CITES import and export ban. (Hong Kong was the first to join, followed by the mainland in 1981. Macau did not start to fully implement CITES ivory legislation until 1986).

Law enforcement is inadequate: notably a lack of detection dogs, which are not employed in large enough numbers along the smuggling chain, yet they are known to be hugely effective. Elephant poaching has been increasing in Africa. Also escalating have been sales of illegal raw and worked ivory in Africa destined for the Chinese market, the weight of ivory seizures from Africa, and the hunger for more ivory in mainland China. The low prices for ivory in Africa compared with relatively high prices in China have encouraged more smuggling, and the risk of being caught by Hong Kong customs is small. Smuggling in general between Hong Kong and mainland China has been on the rise, according to Clement Cheung, Commissioner of Hong Kong's Customs and Excise (*Xinhua* 2014).

There was a jump in the quantity and value of ivory tusks seized by customs in Hong Kong from 2012 to 2013 by 43% and 115% respectively, according to the Hong Kong's Customs and Excise Department (*Xinhua* 2014). This can be read in two ways: that the authorities are more vigilant or that the quantities in shipments

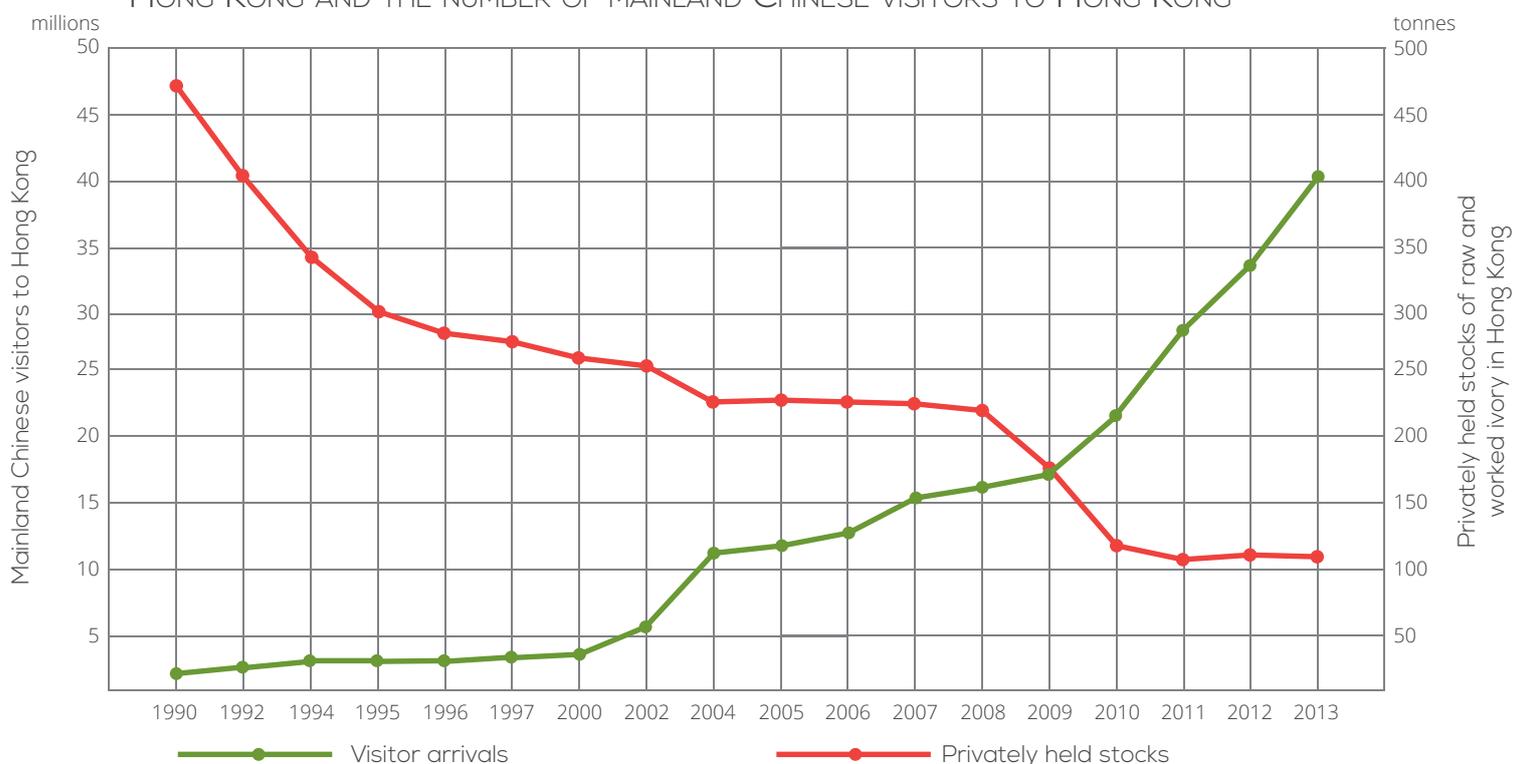
increased; in reality it could be both. All this confiscated ivory, raw and worked, is kept in the official stockpile in Hong Kong, which amounted to 29.6 tonnes at the beginning of 2014, but between May and December 2014, AFCD incinerated about 12 tonnes to send a message that Hong Kong's government is trying its best against the illegal ivory trade, although burning the confiscated ivory stocks does not resolve the growing smuggling of newly poached ivory (AFCD, pers. comm. June 2015).

Regarding ivory items for sale, if we assume that the average weight of an item is 50 g, then at the time of our survey, in which we counted 30,856 items, the estimated total weight of ivory was approximately 1.5 tonnes. The turnover of ivory items is unknown, but assuming that it may take at least a couple of years to sell the bulk of items on display, the most intense law enforcement efforts are needed to stop the very large shipping containers carrying sometimes 4 tonnes of raw ivory in one consignment via Hong Kong to the mainland. Nevertheless it is of course important for retail outlets also.

Critics of AFCD claim that some vendors in Hong Kong are topping up their inventory of ivory objects in their shops from items made out of recent illegal raw ivory imports perhaps carved in mainland China and smuggled into Hong Kong. For example, Peter Knights, executive director for WildAid, said in *WildAid News* (2014) 'Historically, these 'legal' stocks [in Hong Kong] were used as a cover to sell and launder fresh poached ivory, it seems likely those practices have continued ...' This opinion is partly based upon the small reduction in quantity of registered ivory stocks recorded by the government in recent years, according to official statistics (Table 1 and graph). According to AFCD officials, the small reduction in quantity of registered ivory stocks in recent years may be because the local demand in ivory is small.

From 1990 to 2004 these ivory stocks declined by 238 tonnes. The number then remained

COMPARISON BETWEEN THE GOVERNMENT-REGISTERED PRIVATELY HELD STOCKS OF IVORY IN HONG KONG AND THE NUMBER OF MAINLAND CHINESE VISITORS TO HONG KONG



From 2009 to 2013, the privately owned ivory stocks recorded by the Hong Kong government included only those for commercial purposes.

roughly stable for five years (Table 1). This was the same period, ironically, when mainland Chinese visiting Hong Kong soared from about 12 million to nearly 17 million (see graph). The official ivory stock figures then dropped in 2009, but this was because the registration system changed. According to the ordinance, possession of ivory for commercial purposes requires a licence. From the old system that covered registered ivory for commercial purposes, including some non-commercial ivory and some pre-Convention ivory, only commercial stocks were registered since 2009. There was a corresponding drop in numbers of traders and 'Commercial Possession' licences (i.e. outlets) as well. From 2008 through 2010 the registered stocks fell by 111 tonnes, an average of 37 tonnes a year, mainly due to cancellation of non-commercial stocks from the registration process. AFCD officials said that they do not know where this non-commercial ivory went because non-commercial stock (sometimes called inactive stock) is not subject to a Licence to Possess (*South China Morning Post* January 2015). From 2010 through 2013, in

contrast, the commercial stocks were reduced by a mere 4 tonnes or an average of 1 tonne a year, despite the continuing increase in the number of mainland Chinese over this period, from 22,684,388 to 40,745,277, still the main buyers of worked ivory today (see graph) (AFCD unpublished statistics; Hong Kong Tourism Board 2014). Some members of AFCD, however, believe there is no correlation between the quantity of registered ivory stock under Licence to Possess and the number of tourists to Hong Kong (AFCD, pers. comm. June 2015).

Regarding the checks of outlets, the most recent regular AFCD inspection of the shops selling ivory took place in 2014 and the officials did not spot any illegal trade of ivory (AFCD, pers. comm. December 2015). Many outlets selling ivory items, however, do not display the compulsory licence, and if they do, they are sometimes out of date, from our observations and from those of Alex Hofford (pers. comm. January 2015) implying that the inspectors do not have the time for thorough enough checks and investigations.



Elephant ivory and mammoth ivory can look extremely similar, but elephant ivory has to be sold in a licensed outlet and cannot legally be exported.

A major difficulty in identifying elephant ivory items versus mammoth ivory items is that many outlets sell both types of ivory that look very similar and often mix the two up on the same shelves. This makes it a challenge for officials in checking which items are which. No simple test has yet been devised that officials can use in the shops to test an ivory item that is not clearly recognizable to see if it is made of elephant or mammoth ivory, nor to check its age. Detection dogs, for example, have not yet been tried to differentiate between elephant and mammoth ivory. Some items look surprisingly new for pieces carved before 1990. This is another challenge for inspectors because some vendors cannot prove their items are all genuinely of pre-1990 stock.

Occasionally vendors dishonestly state to Western customers that their elephant ivory items were made of mammoth ivory which would cause them to travel home unknowingly with a prohibited ivory item; vendors may also explain to customers purchasing elephant ivory trinkets how best to smuggle them out without being caught. Overall, there appeared to be fewer such discrepancies and mixing of elephant and mammoth ivory items compared with outlets seen in cities on the mainland.

A considerable problem for items sold in Hong Kong is the inadequate enforcement at the land border crossings to the mainland. Most visitors come overland to and from Hong Kong by train and vehicle (68%), up from 60% in 2009, followed by air (22.7%) and sea (9.3%). These statistics show where law enforcement is most lacking. Inspection rates at the borders seem to be low according to Brendon Moyle (pers. comm. May 2015). There is no Hong Kong presence to spot-check the average traveller at the Hong Kong airport nor the Lo Woo foot border crossing (Hofford, pers. comm. May 2015). Much ivory is smuggled in Chinese mainlanders' luggage that is rarely discovered by the Hong Kong authorities due to the huge quantities of suitcases, shortage of government inspectors, and emphasis on checking for other illegal goods. On the Chinese side customs are more interested in taxing the large quantities of luxury goods bought in Hong Kong to be sold in mainland China, rather than looking for ivory trinkets. The Chinese customs similarly have insufficient manpower to inspect the mounds of luggage for ivory of the tens of millions of Chinese returning home annually from Hong Kong.

MAMMOTH IVORY

Little legislation exists regarding mammoth ivory, as it comes from an extinct species, even though it is a look-alike material that can be easily confused with elephant ivory, particularly when Grade A mammoth ivory is carved into small items. This means elephant ivory items can be passed off as mammoth ivory items in retail outlets and at customs, especially the smallest items, which are difficult to tell apart, making law enforcement a considerable challenge for trinkets. Mammoth ivory's domestic and international trade is totally open in Hong Kong.

Until the late 1990s Chinese mainlanders did not appreciate mammoth ivory as they knew so little about it. Now demand for raw mammoth ivory is increasing, especially among mainland Chinese, with a general growth in popularity of ivories due to cultural demand and rising wealth. But there is no mammoth ivory association in Hong Kong whereby traders, carvers and

vendors can regularly discuss discrepancies occurring in the trade in order to keep their reputation clean by vetting their members and preventing illicit traders and carvers from passing elephant ivory off as mammoth ivory or the other way round.

Presently with many outlets selling both types of ivory, often mixed together in the same glass cabinets without clear labels, distinguishing the two ivories is a further problem. Buyers from abroad may purchase ivory items irrespective of the type of material. This is a double-edged sword as it means that mammoth ivory items are being accepted as an ivory substitute, being sold to customers who might otherwise buy elephant ivory, but it also means that if dealers or customers want to pretend their elephant ivory is mammoth ivory, they can do so, especially if the cross-hatching is not clear, as is the case with smaller objects.



Signs for mammoth ivory cannot help inspectors when elephant ivory items are mixed in, unless items are clearly separated. Many outlets, including specialty ones, sell both together on the same premises, making inspection for illegal new ivory items much more difficult.

CONCLUSION

Hong Kong still has on display for sale in its retail outlets more elephant ivory items than any other city in the world, albeit predominantly trinkets and jewellery. Following the CITES ban in 1990, the Hong Kong government officially recorded private stocks of elephant ivory and allowed domestic trade of commercially registered ivory items, but did not allow their export to the mainland or anywhere else.

Over 90% of the buyers of ivory items in Hong Kong nowadays are from mainland China, and from 2009 to 2013 their numbers doubled to over 40 million visiting the city annually, mainly coming to shop. One would expect the legal stocks of ivory items thus to be falling significantly, but there was not a noticeable reduction in commercial private registered stocks from 2010 to 2013: 121.1 tonnes down to 117.1 tonnes.

The number of elephant ivory items surveyed for sale in Hong Kong during our recent study (December 2014/January 2015) went down slightly, since surveyed four years earlier, by about 10% to 30,856 items counted in 72 outlets, although this decline probably cannot be taken as statistically significant. Mammoth ivory items were also surveyed. Legal tusks from the extinct mammoth, which are collected every summer in the melting Russian tundra, are traded mostly to Hong Kong. Some carvers started buying these very-curved large tusks to carve after 1990 as a substitute for elephant ivory. Most mammoth tusks are exported legally to the mainland for carving as wages are less there. From the 2007–2010 period to the 2011–2014 period the quantity increased by 39% to 37.2 tonnes on average per year. Some of this worked mammoth ivory is displayed for sale in Hong Kong's retail outlets where it is less expensive than on the mainland due to lack of taxes. During our recent survey we counted 20,583 mammoth ivory items in 27 outlets, a 50% increase in four years.

Of the total number of elephant ivory items counted on display, jewellery made up 57%, small figurines 21% and chopsticks 9%. The mainland Chinese buy mostly small elephant

ivory items in Hong Kong as they are less expensive than large carvings and they can be more easily smuggled home. They also believe there is less chance of buying fake ivory in Hong Kong. They buy elephant ivory items for personal use or to re-sell on the black market when back home because items in the shops on the mainland are more expensive.

For Hong Kong's mammoth ivory, the average weight of a mammoth tusk imported from Russia in 2014 was around 30–35 kg, enabling Chinese carvers to make larger items than from the majority of today's smaller elephant tusks; demand for such items has been rising. In our survey the mainland Chinese bought at least 80% of them, mostly small figurines and figures that made up 97% of the items we counted on display, as opposed to jewellery, which the Chinese prefer in elephant ivory. Prices of items for both ivories have increased because of the rising demand from the soaring numbers of Chinese visitors.

In Hong Kong some vendors promote the sale of mammoth ivory with posters in their shops, but they do not promote elephant ivory as vendors do not want to draw attention to these products, knowing the international unpopularity of elephant ivory. Public pressure against the ivory trade has been rising. As a result, in 2014 four department store companies terminated their display for sale of elephant ivory items.

Monitoring elephant ivory items and outlets to check if they are legal, and trying to prevent buyers smuggling them out are ongoing law enforcement problems. Customs and other officials say they do not have time to examine all the bags for ivory because they have to deal with such large quantities of luggage. The land border between Hong Kong and the mainland is one of the busiest in the world. Very few ivory items are thus confiscated, so travellers have little fear of being arrested and fined. Neither are fines nearly strong enough to serve as a serious deterrent. Officials on the mainland Chinese border side are also understaffed to search for ivory; they are more concerned about consumer items that are liable to import



Carved mammoth tusks are put in the windows of specialist outlets to attract customers, as here on Hollywood Road.

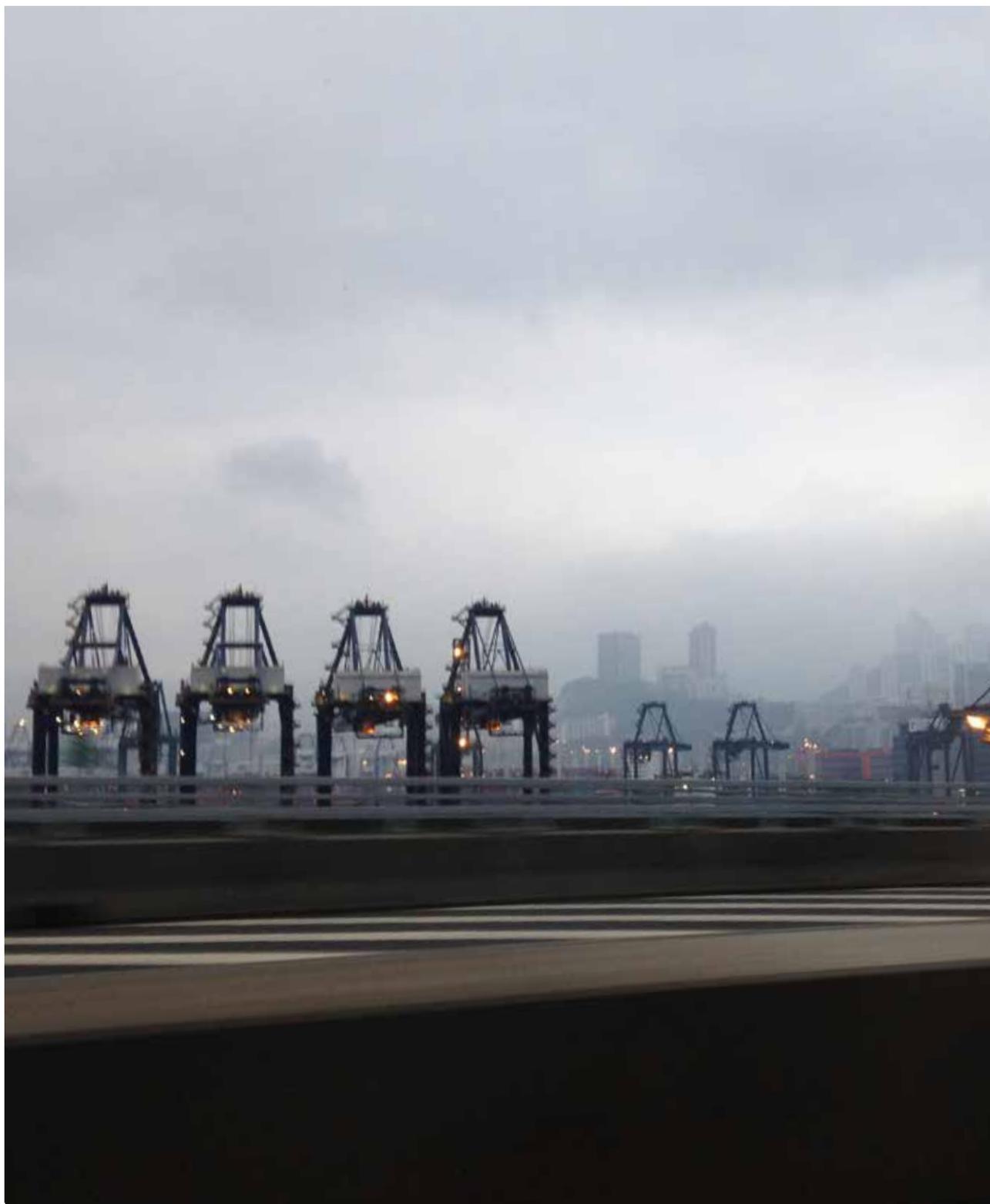
duty and about drugs. Implementation of the laws is simply insufficient at the land entry points on the mainland with again a lack of clear information on penalties for ivory smuggling.

These problems, combined with the even greater challenge that the Hong Kong government faces of intercepting the tonnes of illegal raw elephant ivory in shipping containers that pass from Africa via Hong Kong to mainland China, are profound. To reduce elephant poaching in Africa, preventing large shipments of raw ivory via Hong Kong is of course the most important law enforcement requirement in Hong Kong. The presence of detection dogs is notably lacking, which makes checking that much more difficult and time-consuming for both imports of tusks and exports of items.

Regarding Hong Kong's legal retail ivory market, law enforcement is inadequate in checking all the licences and ivory items coming from the shops without detection dogs and greater support. If controls in the outlets are not improved, if restrictions on mainland Chinese visitors coming to shop in Hong Kong are not made stronger, if publicity against smuggling ivory into mainland China does not become significant, and if customs do not seize more items and impose much more effective penalties to make the risk of smuggling greater than the benefit, this ivory business in Hong Kong will continue to lack effective management and will continue undeterred. If Hong Kong does not carry out and enforce any domestic trade ban on elephant ivory items, it will continue to be the largest market for elephant ivory trinkets in the world.

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Hong Kong's port has rows and rows of shipping births for unloading containers or for transporting them onto the mainland. The government has been seizing increasing amounts of illegal ivory, but with a lack of detection dogs to identify ivory, smugglers are prepared to take much greater risks.

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Mammoth ivory carvings are sometimes large and intricate pieces consisting of several separately carved characters.

ABBREVIATIONS

AFCD	Agriculture, Fisheries and Conservation Department
AFD	Agriculture and Fisheries Department
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
ETIS	Elephant Trade Information System
EU	European Union
HKD	Hong Kong dollar
USD	United States dollar
VAT	value-added tax

TABLES

Table 1. Privately held stocks of raw and worked ivory registered with the Department of Agriculture, Fisheries and Conservation, 1990 to 2008

Year	Tonnes
FOR COMMERCIAL PURPOSES, NON-COMMERCIAL PURPOSES, AND SOME PRE-CONVENTION STOCK (PRE-1975, WHEN CITES WAS FORMED)	
1990	474 ^a
1992	404
1994	345
1995	306
1996	283
1997	278
2000	261
2002	256
2004	236
2005	238
2006	237
2007	236
2008	232
FOR COMMERCIAL PURPOSES ONLY	
2009	177.9
2010	121.1
2011	116.5
2012	118.7 ^b
2013	117.1

Sources: Letter to DS Melville, WWF (Hong Kong) 27 February 1990 from Agriculture and Fisheries Department (MK Chung); Hong Kong Government, Agriculture, Fisheries and Conservation Department, 1992–2013 (unpublished data collected by the authors)

^a Tusks 107, cut pieces and scrap 217, worked ivory 150

^b Some non-commercial ivory was included. In 2012 there was a net increase of 2.2 tonnes of registered ivory from non-commercial to commercial purposes, and thus the quantity of registered ivory under Licences to Possess increased (press release, Secretary for the Environment, Mr Wong Kam-Sing, 4 June 2014).

Table 2. Number of ivory traders registered and number of Commercial Possession Licences for ivory issued by the Hong Kong government, 1990–2013

Year	Ivory traders (no.)	Commercial Possession Licences (no.)
1990	880	1101
1992	807	907
1994	746	899
1996	697	836
1998	675	776
2000	665	762
2002	667	773
2004	692	822
2006	461	612
2008	458	599
2009	—	609
2010	357	465
2011	354	431
2012	361	436
2013	364	447

Source: Hong Kong Government, Agriculture, Fisheries and Conservation Department (unpublished data collected by the authors)

Table 3. Number of ivory factories and employee size in Hong Kong, 1976

Factories (no.)	Employee size (no.)	Factory carvers (no.)	Carvers outside (no.)	General workers (no.)	Clerical staff, managers, etc. (no.)	Totals (no.)
40	20–49	224	949	41	105	1319
29	1–9	94	33	12	14	153
28	10–19	153	137	56	34	380
17	50–99	120	990	47	60	1217
6	100–199	39	620	45	74	778
1	200 plus	6	210	5	9	230
Total	—	636	2939	206	296	4077

Sources: Survey carried out in 1976 by the Hong Kong Ivory Manufacturing Workers General Union, 1978, Hong Kong. Unpublished. Data concerning the 121 ivory factories comes from the Hong Kong government's Trade, Industry and Customs Department

Table 4. Re-exports of mammoth tusks (kg) from Hong Kong, 1994 to 2014

Year	Hong Kong to mainland China	Hong Kong to all countries
1994	360	787
1995	3,392	3,392
1996	4,645	4,645
1997	3,994	4,129
1998	8,288	8,532
1999	5,403	7,283
2000	4,884	5,140
2001	8,677	8,728
2002	8,734	8,807
2003	9,960	10,085
2004	23,295	23,340
2005	18,529	18,543
2006	23,872	24,177
2007	29,891	31,829
2008	31,271	32,323
2009	14,242	14,457
2010	32,947	33,285
2011	41,557	41,698
2012	28,101	28,764
2013	33,194	34,517
2014	37,652	43,812

Source: Hong Kong Government, 1994–2014

Table 5. Imports of mammoth tusks (kg) into Hong Kong, 1992 to 2014

Year	Russia to Hong Kong	All countries to Hong Kong
1992	0	244
1993	0	1,408
1994	0	12,809
1995	0	7,199
1996	6,050	12,204
1997	5,648	6,000
1998	8,342	9,034
1999	5,713	6,883
2000	4,983	5,041
2001	10,370	10,395
2002	16,696	20,022
2003	14,336	15,979
2004	20,481	23,021
2005	17,216	18,149
2006	15,847	18,318
2007	45,120	46,230
2008	26,370	27,088
2009	20,363	21,587
2010	36,665	42,198
2011	36,701	38,709
2012	55,095	57,448
2013	36,147	41,623
2014	48,316	54,026

Source: Hong Kong Government, 1992–2014

Table 6. Types of retail outlets and number of elephant ivory items counted in Hong Kong, 2014/15

Type	Outlets (no.)	Outlets (%)	Items (no.)	Items per outlet (no.)
Antique gallery	21	29	319	15
Gift shop	15	21	1,093	73
Hotel souvenir shop	4	6	1,469	367
Jewellery outlet	9	13	587	65
Mahjong shop	3	4	471	157
Name seal outlet	7	10	420	60
Specialty shop	13	18	26,497	2,038
Total	72	101	30,856	429

Table 7. Elephant ivory items seen for retail sale in Hong Kong, 2014/15

Elephant ivory items	Percentage of total
Figurine	31
Ring	25
Pendant	14
Necklace	11
Chopsticks, pair	9
Bangle	5
Earrings, pair	2
Name seals	2
Miscellaneous	1
Total	100

Table 8. Retail prices for elephant ivory items in Hong Kong in US dollars, 2014/15

Item	Size (cm)	Price range	Average price
JEWELLERY			
Bangle	1-2.5	128-1128	519
Bracelet, beaded	1-2	205-1538	742
Necklace	0.5-1	256-2308	973
Pendant	1.5-2.5	64-186	105
Pendant	4-5	138-615	314
Ring	0.25	9-58	33
Ring	0.5-1	26-109	42
FIGURINES/FIGURES			
Animal, human	4-5	51-820	317
	10-15	1346-2564	1373
	30	3846-12821	6410
MISCELLANEOUS			
Cigarette holder	10-15	26-641	224
Chopsticks, pair	20-22	128-513	308
Name seal	2 x 6	77-423	231

USD 1 = HKD 7.8

Table 9. Types of retail outlets and number of mammoth ivory items counted in Hong Kong, 2014/15

Type	Outlets (no.)	Outlets (%)	Items (no.)	Items/outlet (no.)
Antique shop	3	11	234	78
Department store	4	15	232	58
Gift shop	5	19	1,122	224
Hotel souvenir shop	3	11	226	75
Specialty shop	12	44	18,769	1,564
Total	27	100	20,583	762

In 2014/15, 97% of the mammoth ivory items seen for retail sale in Hong Kong were figurines and figures; pendants and necklaces were 1% each, and 1% were miscellaneous items

Table 10. Retail prices for mammoth ivory items in Hong Kong in US dollars, 2014/15

Item	Size (cm)	Price range	Average price
JEWELLERY			
Bangle	1-2.5	744-1,987	1,268
Bracelet, beaded	1-2	256-1,538	702
Necklace, beaded	0.5-1	291-1,504	776
Pendant	1.5-2.5	36-87	56
Pendant	4-5	282-615	410
FIGURINES/FIGURES			
Animal, human	4-5	38-682	478
	10	1,199-8,718	5,401
	20-25	5,295-41,026	16,649
	30-35	2,764-79,679	32,958
	60	121,282-167,820	136,795
TUSKS			
Carved	20-25	2,045-32,040	13,336
	30	19,179-63,462	41,321
	90-120	38,462-61,026	49,744
	180	1,678,205-1,983,333	1,840,171
Polished	30	6,923	6,923
	200	3,205,128	3,205,128
MISCELLANEOUS			
Cigarette holder	10-15	141	141
Name seal	2 x 6	154-410	251

USD 1 = HKD 7.8

Table 11. Retail price comparisons (USD) for elephant ivory items in Hong Kong in Dec./Jan. 2010/11, Guangzhou in Jan. 2011, Beijing in May 2014 and Hong Kong in Dec./Jan. 2014/15

Item	Hong Kong Dec./Jan. 2010/11	Guangzhou Jan. 2011	Beijing May 2014	Hong Kong Dec./Jan. 2014/15
Bangle 1-2.5 cm	226	632	1933	519
Chopsticks pair	—	455	746	308
Cigarette holder	109	296	623	224
Name seal, personal	—	214	790	231
Pendant, 3-5 cm	50	66	757	314
Ring, 0.25 cm	—	10	84	33

USD 1 = HKD 7.8; USD 1 = 6.5 yuan (2011) and USD 1 = 6.1 yuan (2014)

ESMOND MARTIN

Esmond Martin is a geographer who began carrying out fieldwork in the late 1960s on the economies of various towns on the East African coast. Killing elephants and exporting their tusks, often on dhows, was part of the illegal wildlife trade at the time. Since then he has studied the ivory trade in all the world's major markets. He first visited Hong Kong in 1979 to chronicle the ivory and rhino horn trades, returning five times since then to update his research.

During his early findings in Asia with his wife, Dr Chryssee Martin, he discovered and publicized certain wildlife myths and misunderstandings held in the Western world. During several visits to Japan starting in 1980, he learned that the largest amount of ivory in the world was used to make name seals in Japan, not as others then believed, for making ivory trinkets in China. In the late 1970s he and his wife discovered that the Chinese and other eastern Asians never used rhino horn as an aphrodisiac but as a medicine, mostly to lower fever. They also

learned that most rhino horn in the 1970s was going to Yemen to make into dagger handles.

Dr Martin has been involved with Chryssee Martin and Lucy Vigne in promoting policies in Nepal and India that have been successful in reducing poaching of large mammals, especially elephants and rhinos. He believes that many of these successful policies, especially strong political support, high budgets per square kilometre for sufficient workforce on the ground, efficient collection of intelligence data on illegal traders, severe penalties for convicted wildlife criminals, less corruption in the wildlife sector, and motivated, well-trained, honest field staff can be successfully adopted by other countries with elephants and rhinos to improve their protection.

LUCY VIGNE

Lucy Vigne, a zoologist, was first alarmed by the suffering of elephants on a journey through Africa, travelling in 1983 by boat across the Sudd in southern Sudan where she saw a herd of hundreds of elephants moving in distress across the horizon. On arrival in Kenya and working for Iain Douglas-Hamilton on poached elephant carcasses from aerial counts across Africa, she learned that large herds of elephants gathering together signalled they were trying to escape from poachers. She later carried out a study on elephant skeletons in the Tana Primate Reserve near the Kenya coast, ageing them, and learning how the population in the region had been seriously reduced by poachers for ivory. Her work continued on the elephant and rhino poaching crisis until their numbers stabilized in

the 1990s when she continued to monitor the trade in ivory and rhino horn.

There was a respite in heavy poaching of elephants and rhinos until 2008, when increasing wealth in China and Vietnam stimulated demand for ivory and rhino horn once again. Large numbers of Chinese contract workers in Africa fuelled the demand further. Lucy Vigne has been researching retail ivory markets in Africa and Asia (which are mostly illegal) in the last few years, with by far the biggest buyers of elephant ivory—and legal mammoth ivory—both raw and worked, being mainland Chinese.

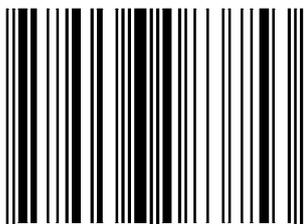


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