

In Transition: Bangkok's Ivory Market

An 18-month survey of Bangkok's ivory market

Kanitha Krishnasamy, Tom Milliken and Chution Savini





TRAFFIC REPORT

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Southeast Asia Regional Office
Unit 3-2, 1st Floor, Jalan SS23/11
Taman SEA, 47400 Petaling Jaya
Selangor, Malaysia
Telephone: (603) 7880 3940
Fax: (603) 7882 0171

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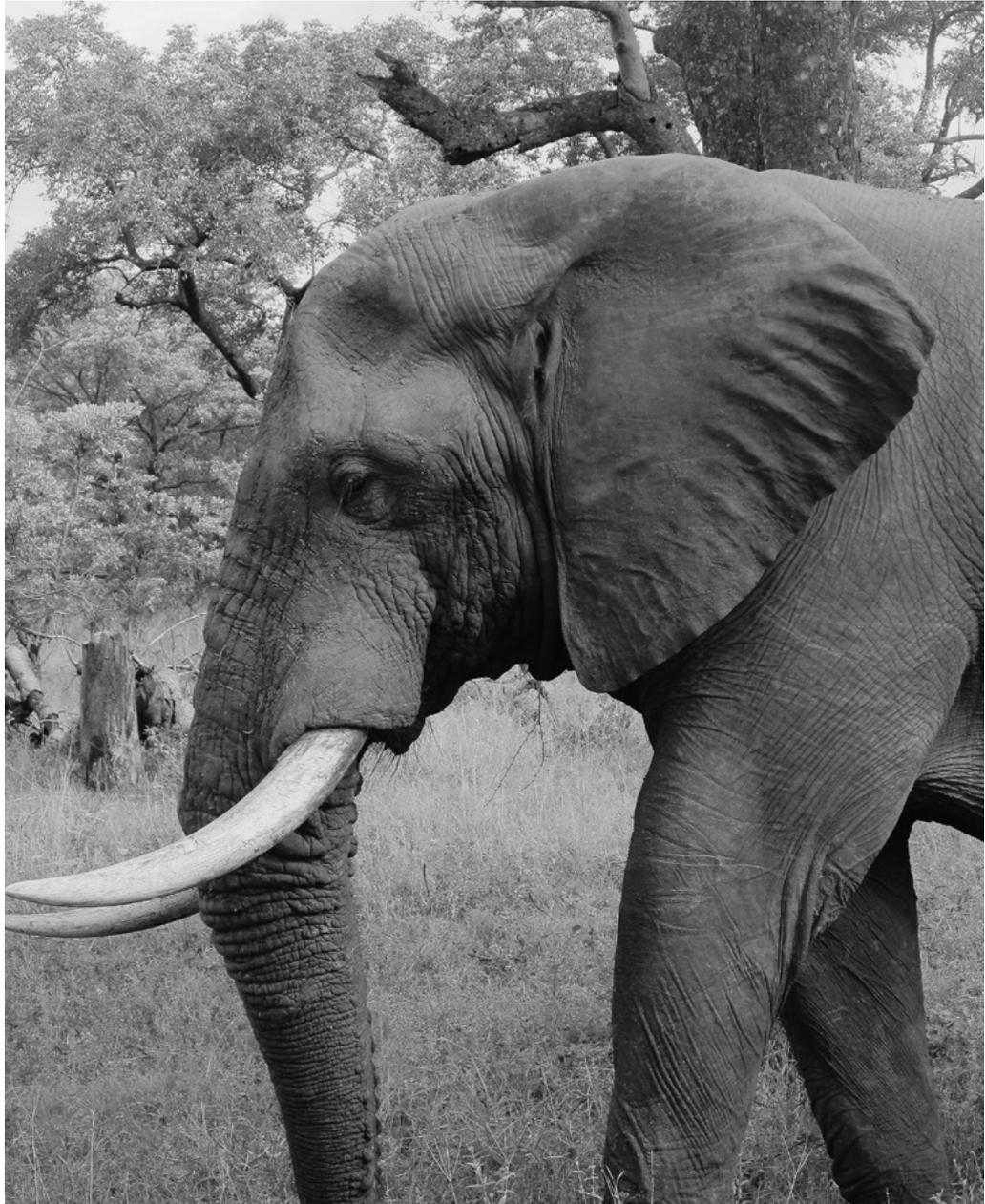
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Front cover photograph: African Elephant
Loxodonta africana
Credit: Kanitha Krishnasamy/TRAFFIC

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African Elephant *Loxodonta africana*

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ABBREVIATIONS AND ACRONYMS

CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora CoPConference of the Parties (to CITES)
DNP	Department of National Parks, Wildlife and Plant Conservation
ETIS	Elephant Trade Information System
NIAP	National Ivory Action Plan
SC	Standing Committee
WARPA	Wild Animal Reservation and Protection Act

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EXECUTIVE SUMMARY

At the 64th Meeting of the CITES Standing Committee in March 2013, Thailand, along with eight other countries and territories, was identified as a country of “primary concern” due to its significant role in the global ivory trade. These countries and territories were subjected to an oversight process that required the development of a time-bound National Ivory Action Plan (NIAP). This was an unprecedented accountability mechanism introduced by CITES for countries most seriously implicated in global illegal ivory trade to put in place strict measures to address a range of issues that served to facilitate illegal trade in ivory. Thailand’s NIAP was submitted to the CITES Secretariat in May 2013, though this Plan was deemed insufficient to address domestic ivory trade regulation effectively. The 65th Meeting of the Standing Committee (SC65), at its meeting in July 2014, adopted a Decision, calling on Thailand to revise its NIAP and to include clear and deliverable measures for its implementation before 31 March 2015. Among other issues requiring attention, Thailand’s revised NIAP needed to include measures concerning legislation revision and registration of domestic ivory trade.

In response to this Decision, Thailand announced in December 2014 the revision of its primary wildlife and CITES-implementing law, the Wild Animal Reservation and Protection Act (WARPA) B.E 2525 (1992), by listing the African Elephant *Loxodonta africana* as a nationally protected species. Thus Thailand finally introduced a legal means to implement CITES within the country for African Elephant parts and products; the import, export, trade and sale of ivory from African Elephants was now prohibited.

A month later in January 2015, a new law was also enacted, the Elephant Ivory Act B.E 2558 (2015), to govern the regulation of Thailand’s domestic ivory trade, limiting it exclusively to Asian Elephant *Elephas maximus* ivory from registered captive animals. Following this, Thailand successfully conducted a nationwide registration process, with more than 40 000 people registering 670 984 ivory products, weighing a combined 200 358 kg (totals as at August 2015). Products registered included stocks that were held both privately and commercially. Items for commercial purposes amounted to less than 2% of the total weight registered, but represented 53% of the total number of worked (carved) ivory items that was deemed to enter the national marketplace. The average weight of the worked ivory registered as commercial stock was only 9.31 grams per piece, indicating that most finished products for sale were extremely small items.

Since these regulatory amendments took place in Thailand, the 2016 Elephant Trade Information System (ETIS) report has recognized it as a country of “secondary concern”. This is reflective of Thai government efforts to tackle ivory trade, perhaps the most impressive progress made compared to any other CITES Party in addressing ivory trade issues since 2013. Apart from the notable legal and regulatory reforms, a contributing factor to this new positioning as of “secondary concern” was that Thailand was not a primary destination for any large scale-seizures for the period 2012-2014. Outside this period assessed by ETIS however, the Royal Thai Customs made at least seven known seizures from April to August 2015 amounting to almost 6.5 tonnes of ivory.

To better understand the effects and effectiveness of Thailand’s newly introduced regulatory regime, TRAFFIC conducted an 18-month survey of open market availability of ivory in Bangkok from December 2014 through June 2015. This exercise was done to assess market trends during the period immediately before the Elephant Ivory Act came into effect and after the law came into force. Surveys were conducted across nine different retail market locations: Chatuchak Market, Chatuchak Mall, River City, Amulet Market, MBK Plaza, Amarin Plaza, Big C Rama 2, Central Rama 2 and Central Rama 3. The number of shops surveyed ranged between 143 and 169 shops.

A steep decline in the number of retail outlets offering ivory and the number of ivory products found for sale was observed since Thailand's legislative reform. A monthly high of 7421 ivory products was recorded in December 2014, but this declined to a record low of 283 ivory products in June 2016. Similarly, the highest number of shops selling ivory was recorded in December 2014 and the lowest number of retail outlets selling ivory (5) was in June 2016. An average of 2662 ivory products per month were recorded in trade over this 18 month period. However, when averaging the number of products in trade since April 2015, when the law came into place, this figure reduces slightly to a total of 2049 products. September 2015 saw the highest number of products (3227) recorded in Bangkok since the law was enforced, while November 2015 saw the highest number (18) of shops selling ivory. The biggest jump in availability of worked ivory items occurred in November 2015, when an increase of 1096 ivory products was noted at the Chatuchak Market, compared to the previous month; one shop alone had 2285 products for sale at that time. The top two locations with the highest number of retail outlets were Chatuchak Market and the Amulet Market. Throughout the survey period, several shops which previously sold ivory were closed (both that were temporary and some that were permanently closed down), with a clear reduction in the number of observable ivory product on display.

This report provides a summary overview of Bangkok's ivory marketplace, and provides comparisons with TRAFFIC's previous market surveys in 2013 and early 2014. Thailand's efforts in the last 15 months since its legislative reform took place have shown considerable and evident progress. A clear reduction has been observed in the open availability of ivory products in Thailand's capital city after trade has been regulated, compared to the preceding months of unregulated trade. The number of ivory products in trade averaged 10 469 per month over the 13 months before the Elephant Ivory Act came into place, compared to an average of 2048 products per month for the 15 months where trade was subjected to regulation.

The transformation of Thailand's regulation and trade control policy in Bangkok is evident in the marketplace over a two and a half years period. The overall effort taken to reach this stage, due to the oversight process imposed by CITES, is admirable. Indeed, the CITES Elephant Trade Information System (ETIS) report in June 2016 evaluated Thailand as a country of "secondary concern". However, the situation requires continued regulation and enforcement, particularly given the active trade that appears to be occurring on online platforms. A separate online survey on Facebook and Instagram accounts conducted by TRAFFIC between June and July 2016 shows that at least 2550 ivory products, mainly jewellery, were recorded for sale on 42 sites/groups on Facebook and Instagram. This figure is comparative to the average number of ivory products that were recorded in Bangkok's marketplace from March – August 2015. At least 232 unique individuals were identified to be offering ivory for sale. It is unknown if any of these traders are legally allowed to sell ivory, though this clearly points to a need for continued vigilance, particularly with online ivory trade.

Other key issues to address include the roll-out of a robust product marking system to track the disposal of all registered worked ivory products and ensure that unregistered products are not laundered into the system. Further, because none of the registered ivory was forensically examined to ensure that no African Elephant ivory was inadvertently registered and made eligible for retail trade in Thailand, there is a need to randomly test ivory products to demonstrate the integrity of Thailand's management system for legal ivory trade. TRAFFIC stands prepared to work with the Thai authorities to undertake DNA testing to ensure the highest levels of compliance with the new policy framework.

BACKGROUND AND INTRODUCTION

Thailand is an Asian Elephant range State and a country in which elephants hold great cultural significance and have long been revered. Yet, for over 30 years, Thailand's weak wildlife trade legislation has enabled the country to function as one of the world's largest unregulated domestic markets for elephant ivory (TRAFFIC, 2009; and 2016). This state of affairs not only demonstrated poor compliance with requirements under the Convention, but also became a major driver for elephant poaching in Africa. Successive analyses of data held by the Elephant Trade Information System (ETIS) since 2002 have consistently identified Thailand as a significant problematic end-use market for illicit ivory (Milliken *et al.*, 2002; 2004; 2007; 2009; and 2012).

This persistent scenario captured world attention at the 16th Meeting of the Conference of the Parties to CITES (CoP16), hosted by the Government of Thailand in Bangkok during March 2013. At that meeting, and the follow-on 64th Meeting of the CITES Standing Committee (SC64), decisions were taken to subject Thailand, along with eight other countries/territories¹, to an intersessional oversight process to address illegal ivory trade under the direction of the Standing Committee. Consequently, Thailand was required to develop and implement a time-bound National Ivory Action Plan (NIAP) to address a range of outstanding issues that facilitate ongoing illegal trade in ivory, including components concerning legislation and policy, law enforcement, monitoring and public awareness. Although Thailand's NIAP was submitted to the CITES Secretariat in May 2013 in compliance with the established deadline, it was only approved by Thai Cabinet in September 2013, with the Ministry of Natural Resources and Environment (MoNRE) designated as the lead agency for implementation. Thailand subsequently submitted its first progress report to the CITES Secretariat in October 2013.

Initially, Thailand's overall intentions with the NIAP, especially the scope and timeframes for fundamental legislative reform in the regulation of ivory trade, became a contentious issue at SC66 in July 2014. This meeting presented the first opportunity for the Standing Committee to review the NIAP process and the outcome was severe for Thailand. Indeed, an apparent lack of progress and scepticism concerning the Thai Government's commitment to fundamental change led the Standing Committee to adopt a decision calling for the country to enact appropriate legislation, establish a comprehensive registration system, increase efforts to monitor and control ivory traders and ivory data, and take law enforcement actions. The decision further contained a request for Thailand to submit a progress report by 31 March 2015 and, if efforts were not satisfactory, the CITES Secretariat was instructed to instigate a postal vote procedure in accordance with provisions in Resolution Conf. 14.3, paragraph 30 that could lead to sanctions under the Convention. Thailand was the only country or territory in the NIAP process against which such far-reaching action was taken.

Paragraph 30 of Resolution Conf. 14.3 on CITES compliance procedures allows for the imposition of sanctions as follows: In certain cases, the Standing Committee decides to recommend the suspension of commercial or all trade in specimens of one or more CITES-listed species, consistent with the Convention. Such a recommendation may be made in cases where a Party's compliance matter is unresolved and persistent and the Party is showing no intention to achieve compliance or a State not a Party is not issuing the documentation referred to in Article X of the Convention. Such a recommendation is always specifically and explicitly based on the Convention and on any applicable Resolutions and Decisions of the Conference of the Parties.

¹ Kenya, Tanzania and Uganda (as Source countries); Hong Kong, Malaysia, Philippines and Viet Nam (as Transit countries) and China and Thailand (as Destination countries)

In response, Thailand re-submitted a revised NIAP on 15 January 2015 before the required deadline, and has since provided two updates in January and September 2015 on the progress of implementation of activities. The revised NIAP comprised an agenda addressing five main areas:

- 1) Enactment of laws and regulation to curb African Elephant ivory trade and to control domestic trade and possession of elephant ivory;
- 2) Implementation of three registration systems for: a) ivory traders and products, b) legal ivory possession and c) confiscated ivory;
- 3) Scaled-up law enforcement, including the creation and deployment of ivory trade patrol teams to increase vigilance and enforcement;
- 4) Roll out of public awareness amongst main target groups, including foreign tourists, traders, owners of ivory and the general public; and
- 5) Instigation of a national mechanism comprising sub-committees by which ivory trade can be addressed and resolved and be reported on to Thailand's National Committee on CITES and its Prime Minister.

In terms of concrete actions emanating from this revitalised NIAP process, a variety of activities have diligently unfolded in a timely manner. In terms of legislation, two major developments have occurred. Firstly, in December 2014, Thailand amended the Wild Animal Reservation and Protection Act (WARPA) B.E 2525 (1992) by listing the African Elephant *Loxodonta africana* as a protected species, thereby prohibiting the import, export, trade and sale of ivory from African Elephants. This legal amendment came into effect in March 2015, establishing total protection for another non-indigenous species; currently very few non-native species are afforded protection by Thai law (Moore *et al.*, 2016). As a result, legally-acquired African Elephant ivory could be registered for legal possession under WARPA, but it was ineligible for commercial trade in the Thai market under any circumstances.

Next, an entirely new law, the Elephant Ivory Act B.E. 2558 (2015), took effect on 22 January 2015 for the regulation and control of possession and trade of ivory that could be shown to have originated from registered domesticated Asian Elephants in Thailand, which are managed under the Draught Animal Act of 1939. The Elephant Ivory Act mandates anyone in possession of ivory, including owners, dealers and traders, to register it, whether for commercial purposes or not, with the Department of National Parks, Wildlife and Plant Conservation (DNP). Those who acquired ivory, by any means, before the Act was gazetted, had 90 days to register it, with the final date for registration established as 21 April 2015.

Further, under the law, anyone who subsequently acquires Asian Elephant ivory on or after 22 January 2015 is mandated to register their business and ivory stocks within 30 days of the date of acquisition. This applies not only to traders, but also anyone coming into possession of ivory, with an obligation to provide evidence of legal acquisition. Failure to register for possession of domesticated Asian Elephant ivory can result in heavy fines of up to three million Thai Baht (approximately USD90 000). Significantly, failure to register for commercial trade in ivory may result in up to three years imprisonment or up to a six million Thai Baht (approximately USD 186,000) fine, or both.

Following enactment of the Elephant Ivory Act, Thailand's DNP successfully conducted a nationwide registration of ivory stocks. Throughout the country, some 400 government officials participated in the exercise with at least one registration office in every province. As of the end of June 2015, 40 324 people had reportedly registered ivory stocks in Thailand, of which about 15 000

(some 37%) were residents of Bangkok. Although some database issues have subsequently been identified in terms of the accuracy of the aggregated values of collected information (Mr. Adisorn Noochdumrong, Deputy Director General, Department of National Parks, Wildlife and Plant Conservation, pers. com., 12 September 2016), the following summary was provided concerning the status of the registration process in June 2015:

- Number of people who registered ivory stocks nationwide 40 324
- Approximate number of people who registered ivory stocks in Bangkok 15 000
- Number of applicants registered for the intention to trade ivory 247
- Number of ivory products registered 670 984
- Weight of ivory products (tusks, raw ivory pieces, worked products) registered (kg) 200 358²

Table 1 presents a summary of the registered stocks held commercially and privately, according to Department of National Parks, Wildlife and Plant Conservation records in June 2015:

Table 1: Summary of Thailand’s ivory registration as at June 2015

	No of ivory pieces	% of total	Weight (kg)	% of total
Privately-held	315 137	46.97	196 501.55	98.07
Commercially-held	355 847	53.03	3857.22	1.93
TOTAL	670 984	100.00	200 358.77	100.00

Table 2 provides a more detailed account of the quantity of ivory that had been reportedly registered at June 2015, with most stocks being identified as “personal effects”, indicating that the consumption of ivory has enjoyed considerable popularity in Thailand. At the same time, a total of 201³ applications had reportedly been received from individuals who wished to engage in commercial ivory trade. Ivory for commercial purposes was declared at the time of registration, comprising slightly less than 2% of the total quantity by weight, but represented 53% of the total number of ivory items registered (Table 1). The average weight of the worked ivory registered as commercial stock was only 9.31 grams per piece, indicating that most finished products for sale represented extremely small items. As stated, only domesticated Asian Elephant ivory is eligible for commercial sale in Thailand, but it should be noted that none of the commercial stocks registered were subjected to forensic analysis to determine the species of the elephant involved.

² This weight may change due to issues concerning units of measurements used in the database

³ It should be noted Thailand has reported to CITES that 247 trader applications have been recorded as at June 2015 (CITES, 2015).

Table 2: Stocks of ivory registered in Thailand as at June 2015 pursuant to the Elephant Ivory Act

Item	No. of Pieces	% of total pieces	Weight (kg)	% of total weight	Average Weight per Piece (kg)
Privately-held Ivory Stocks					
Raw ivory tusks	33 695.00	10.69	153 005.65	77.86	4.54
Raw ivory pieces	9548.00	3.03	11 066.37	5.63	1.16
Worked ivory pieces	271 894.00	86.28	32 429.53	16.50	0.12
Subtotal	315 137.00	100.00	196 501.55	100.00	
Commercially-held Ivory Stocks					
Raw ivory tusks	96	0.03	200.81	5.21	2.09
Raw ivory pieces	317	0.09	344.77	8.94	1.09
Worked ivory pieces	355 434.00	99.88	3311.64	85.86	<0.01
Subtotal	355 847.00	100.00	3857.22	100.00	
Total: All Ivory Stocks Registered					
Raw ivory tusks	33 791.00	5.04	153 206.46	76.47	4.53
Raw ivory pieces	9865.00	1.47	11 411.14	5.70	1.16
Worked ivory pieces	627 328.00	93.49	35 741.17	17.84	0.06
TOTAL	670 984.00	100.00	200 358.77	100.00	

Source: Department of National Parks, Wildlife and Plant Conservation

More recently, according to information by DNP on 29 August 2016, some 32 ivory trading shops in Bangkok remained in operation, while others had reportedly closed their ivory business; the number of ivory products held by these 32 shops is unknown. Throughout the registration period, ivory continued to be sold in the Thai marketplace. This report provides a summary of the market availability for ivory in Bangkok during the period before the Elephant Ivory Act came into effect, and then tracked market developments through June 2016.

METHODOLOGY

TRAFFIC conducted ivory market monitoring in Bangkok over an 18-month period from December 2014 through June 2016 (with the exception of February 2015 when no surveys were conducted). The sample of retail outlets surveyed was based on past surveys conducted in 2002, 2004, 2009, 2013 and 2014. Surveys were generally conducted during the last week of every month over four or five days, across nine different retail market locations in the capital city: Chatuchak (also referred to as “Jatujak”) Market, Chatuchak Mall, River City, Amulet Market, MBK Plaza, Amarin Plaza, Big C Rama 2, Central Rama 2, Central Rama 3. For the purposes of analysis, the last three named locations have been merged under a single category of “others”, due to the very low number of ivory products observed.

Data collected included the number of retail outlets (including permanent shops and temporary stalls), ivory product types and the estimated number of items per product type. Surveys were conducted by Thai native speakers, who were able to identify ivory reliably. As much as possible, vendors were engaged in conversations informally, to gain some insight into sources, buyers and prices, as well as their general thoughts on the ongoing roll out of regulatory processes. Price information was collected whenever possible, but was often difficult to obtain as traders noted the repeated presence of surveyors every month without making any purchase, and therefore were generally reluctant to share such information freely.

A conversion rate of THB 100 to USD 2.83 has been used, as at 30 June 2016 (<https://www.oanda.com/currency/converter/>)

RESULTS AND DISCUSSION

Overall, survey results indicate a downward trend in terms of the number of shops selling ivory, as well as the number of products recorded in trade, from December 2014 to June 2016 (Figure 1). The top two locations with the highest number of retail outlets were Chatuchak Market and the Amulet Market. From TRAFFIC's previous surveys (Doak, 2014), the Chatuchak Market was the location with the greatest number of retail ivory outlets, but the Amulet Market was in the fourth position, being surpassed by the Chatuchak Mall and River City, two market locations which now show a considerable reduction in ivory product availability.

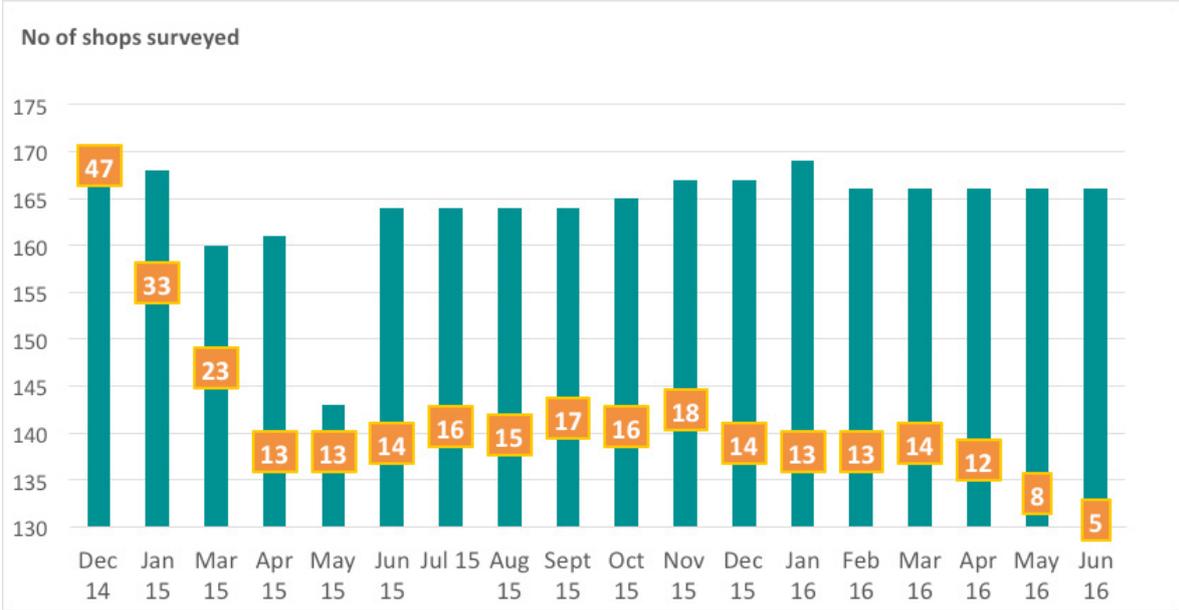
Figure 1: Number of shops selling ivory and the number of products found for sale from December 2014 - November 2015



Retail Outlets

From the range of 143 to 169 shops that were surveyed, an average of 17 shops sold ivory over the 18-month period. A high of 28% (or 47 shops) in December 2014 and a low of 3% (or 5 shops) in June 2016 were found to be selling ivory (Figure 2). These findings show a sharp contrast when compared to surveys that were conducted over a 12-month period between January 2013 and May 2014, where the number of shops selling ivory ranged from 61 to 120, with an average of 93 shops selling ivory during the entire period (Doak, 2014). Thus, overall the number of retail outlets selling ivory had already significantly diminished by December 2014, the starting point of the present study, and has continued to decline markedly towards the end of the survey period. Since the laws regulating ivory trade came into effect in Thailand in April 2015, the highest number of shops (18) selling ivory was recorded in November 2015 and the lowest number (5) was in June 2016.

Figure 2: Trend in the number of shops surveyed against those found to be selling ivory



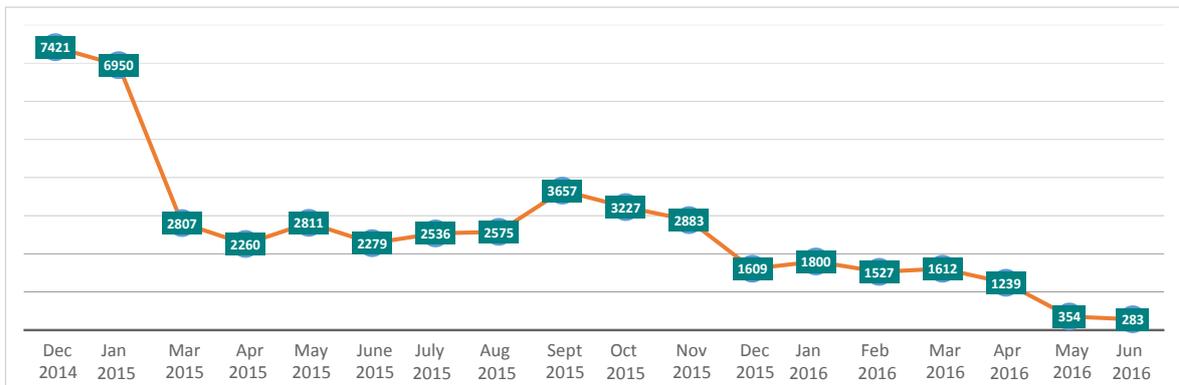
Ivory Products

Like the number of shops selling ivory, the survey data shows a high of 7421 ivory products in December 2014 and a low of 283 in June 2016 (Figure 3). Although numbers have remained low, the biggest jump in availability of worked ivory items occurred in September 2015 when an increase of 1096 ivory products was noted at the Chatuchak Market, compared to the previous month; this result was observed even though the number of retail shops increased by only a single outlet compared to the previous month. September 2015 was also the month with the highest number of products recorded in Bangkok since the new law came into force, but ivory product availability has steadily declined ever since.



Ivory bangles are commonly sold in Bangkok.

Figure 3: Number of estimated ivory products in trade in Bangkok from December 2014-June 2016



Consistent with the data on the number of retail shops found to be selling ivory, products were also concentrated in two key locations: Chatuchak Market and the Amulet Market. Figure 4 is shown as the average number of products (for all 18 months) observed in all the surveyed locations, with an overall average of 2662 products being recorded monthly. However, when averaging the number of products in trade since April 2015, when the law came into place, this monthly figure reduces slightly to a total of 2049 products.

Figure 4: Average monthly number of ivory products, by location, observed for trade in Bangkok from December 2014-June 2016



Figure 5: Typical ivory products sold in Chatuchak Market in September 2015



A total of 32 ivory product types were observed for sale during this period, which can be broken down into three broad categories (Table 3).

Table 3: Categories and ivory product types observed for sale

Jewellery		Accessories		Handicrafts, Decorative and Functional items	
1.	Bangles	8.	Belt buckles	15.	Figurines (< 5 cm)
2.	Bracelets	9.	Combs	16.	Miniature sculptures (> 5 cm)
3.	Earrings	10.	Ear picks	17.	Stupas
4.	Necklaces	11.	Hair pins	18.	Carved ivory boxes
5.	Pendants	12.	Brooches	19.	Chopsticks
6.	Rings	13.	Brushes	20.	Toothpicks
7.	Beads	14.	Ivory fans	21.	Cigarette holders/ smoking pipes
				22.	Gun handles
				23.	Knife handles
				24.	Fiddle handles
				25.	Name seals
				26.	Name plates
				27.	Chess pieces
				28.	Key rings
				29.	Other carved products
				30.	Raw tusks
				31.	Carved tusks
				32.	Polished tusks

Table 4 summarises the top 10 most abundant products available for sale, the most numerous being ivory beads. These were likely loose items that were due to be strung into other products, such as necklaces or bracelets. The general absence of bangles in recent surveys is a remarkable development given the numbers observed in the past.

Table 4: Top 10 most abundant ivory product types for sale

Month	Beads	Pendant	Bangle	Neck-lace	Ring	Bracelet	Figurine (height <5cm)	Earring	Miniature sculpture (height >5cm)	Carved ivory	TOTAL
Dec-14	1171	981	1341	550	941	278	227	102	734	614	7059
Jan-15	1400	800	1138	582	848	348	920	102	285	343	6835
Mar-15	860	641	252	277	175	47	33	157	6	152	2613
Apr-15	550	330	186	146	315	116	400	0	53	140	2253
May-15	750	580	223	361	190	140	180	70	88	81	2679
Jun-15	815	235	221	156	285	226	155	0	77	67	2244
Jul-15	870	250	253	192	275	227	130	58	85	60	2407
Aug-15	950	312	188	307	197	349	95	25	81	15	2520
Sep-15	840	1067	389	192	427	217	23	99	55	144	3464
Oct-15	1130	607	226	379	120	341	103	87	95	32	3120
Nov-15	860	557	266	256	215	329	106	73	70	65	2799
Dec-15	0	197	950	188	307	312	81	349	25	1	2505
Jan-16	0	427	840	389	192	1067	55	217	99	11	3320
Feb-16	0	215	860	266	256	557	70	329	73	2	2734
Mar-16	455	380	44	218	105	112	84	60	59	15	1542
Apr-16	480	290	37	75	100	49	57	55	27	30	1202
May-16	12	54	17	27	30	19	16	15	11	10	212

Price information was collected whenever possible. However, as noted, most vendors were reluctant to share information with individuals who had previously visited their shops without making any purchases. A summary of prices observed from November 2015 onwards is provided in Table 5.

Table 5: Ivory product price

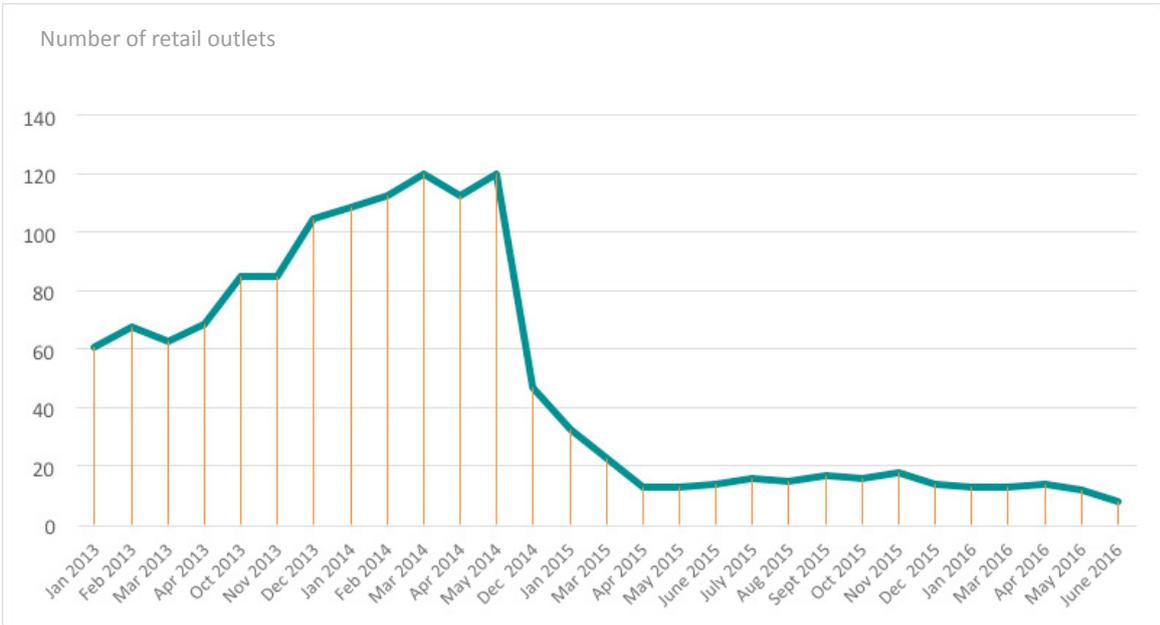
Type of products	Size	Price range/piece) (THB)	USD
Bangles		5000-25000	141-708
Bracelets		2000-5000	57-142
Necklaces		3000-6000	85-170
Pendants	<5 cm	300-1000	8.5 - 28
Pendants	>5cm	2000-4000	57-113
Rings		400-1,200	11-34
Earrings		500-1500	14-42
Figurines	<5 cm	800-2000	23-57
Figurines	>5cm	2500-50 000	71-1417
Miniature sculptures		7000-25 000	198-708
Large ivory skull (approximately 4cm)		3800	113
Small ivory skull (approximately 1cm)		400	12

Over the current survey period there was a pronounced reduction in the open availability of ivory products being sold. An average of 2049 ivory products were observed over the previous 15 months since the completion of the ivory registration in April 2015. On 2 May 2015, when TRAFFIC staff visited Chatuchak Market, just as the ivory registration process was wrapping up, for the first time ever not a single ivory product was observed for sale. But by the end of the month, over 1500 ivory products were again being offered for sale, presumably after they had been registered. Many of the shops that sold ivory in May 2014 no longer sold ivory products 12 months later but instead had other decorative items on offer. However, since March 2016, the last four months of the current survey period, the number of ivory products observed in the market has continued to decline. Although very few new shops have emerged in some locations in Bangkok, more appear to have closed or moved to different locations. A number of the shops closed that are no longer in business were those who were not selling ivory as their main product; most were selling other jewellery and handicrafts. It is unknown if any of these shops that are no longer in business had legally registered with the government and were permitted to trade in ivory. This reduction appears to be the result of increased law enforcement action to ensure strict regulation of Bangkok’s physical ivory market in accordance with Thailand’s new laws. While these trends on the open availability in Bangkok show a positive sign, it is important to be vigilant and monitor how ivory might be moving to other platforms, such as online or social media trade, or to other locations in Thailand historically notable for ivory trade, such as the provinces of Surin, Uthai Thani and Nakhon Sawan (Stiles, 2009). This is discussed further below.

Surveys compared

It is clear that Thailand has seen a major reduction in the open availability of both ivory products and the number of shops selling them its capital city over a two and a half year period at a time when the country was subjected to unprecedented oversight pressure under CITES and the international community. Surveys conducted in the past found far more ivory trade activity. For example, in December 2013, a peak of over 14 500 ivory products were available for sale in Bangkok, while in May 2014 over 13 000 ivory products were observed. Similarly, the number of outlets selling ivory was high, with March and May 2014 recording the highest number of shops selling ivory, 120 shops each month (Figure 6).

Figure 6: Trend in retail outlets selling ivory in Bangkok over 30 (non-consecutive) months between January 2013 and June 2016



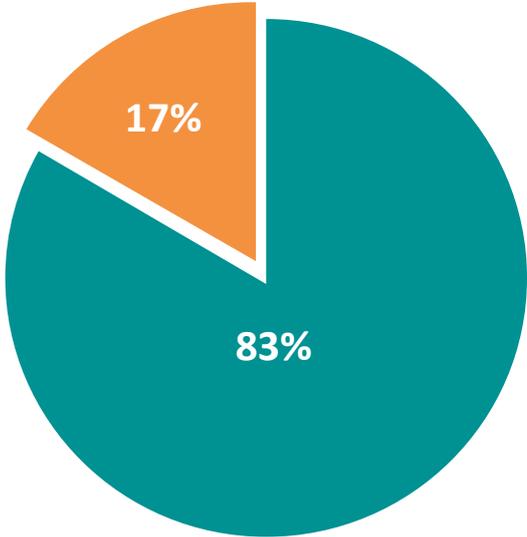
When comparing the survey results over two distinct periods – when there was no law governing ivory trade (until March 2014) and then after ivory trade became legally controlled (April 2014 onwards) – a marked reduction is apparent. From January 2013 to December 2014, when ivory trade was completely unregulated in Thailand, an average of 10 723 ivory products per month were recorded in the 13 months in which surveys were conducted (it should be noted however, that during this 24-month period, a hiatus in market monitoring occurred from May–September 2013 and June–November 2014). In contrast an average of 2049 ivory products per month were recorded in trade from April 2015 – June 2016, over the 15 months assessed (Figure 7a). Similarly, the number of shops selling ivory averaged 89 over the 13 assessed month when ivory was unregulated in Thailand, compared to only 14 shops selling ivory in the succeeding 14 months (Figure 7b). The timeline for ivory registration was 22 January - 21 April 2015; TRAFFIC’s market monitoring activities were conducted during the last week of the month, therefore the month of January 2015 is excluded, while April 2015 is included in this count. Interesting insights are also evident when overlaid with notable incidents and milestones regarding Thailand’s ivory trade issues vis-à-vis CITES (Figure 8).

Following completion of the registration exercise and the resumption of ivory sales in local markets, DNP reported to have undertaken regular inspection of local markets. In late January 2016, shortly after Thai government representatives had returned home from the 66th Meeting of the CITES Standing Committee (SC66) where they had presented another update on the implementation of their NIAP, a “crackdown by the Department of National Parks resulted in 13 of 24 ivory shops being closed in Nakhon Sawan province because they could not show prove they were legal” (Mokkhasen, 2016). TRAFFIC’s 2009 survey of Thailand’s ivory trade identified the Phayuha Kiri and Uthai Thani area south of Nakhon Sawan as second to Bangkok, in terms of the availability of ivory products (Stiles, 2009). As these areas fall outside of TRAFFIC’s current market monitoring, effort to document the scale of ivory trade in areas outside Bangkok, such as the Surin Province in northeast Thailand or Nakhon Sawan in northwest Thailand.

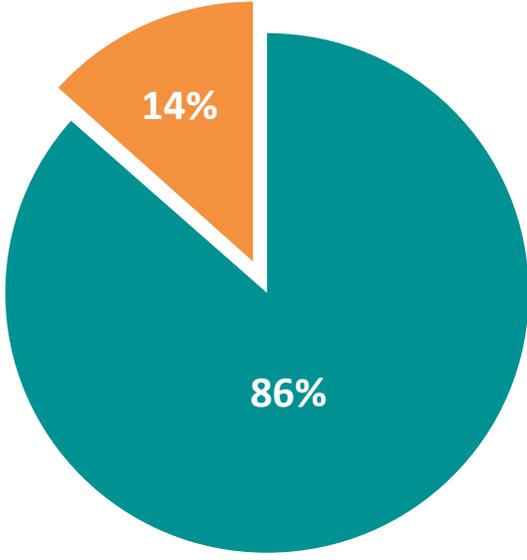
More recently, in Bangkok, DNP also reported that spot checks of retail ivory dealers have resulted in the confiscation of ivory products that were suspected of being crafted from African Elephant ivory, which is now completely illegal under Thailand’s new ivory trade laws. In this regard, on an experimental basis, a hand-held device that was reportedly developed by researchers at Chiang Mai University was used by the Wildlife Conservation Office of DNP in a series of trial tests to differentiate African from Asian Elephant ivory in the marketplace. Using this tool, DNP officers were able to establish “probable cause” concerning the illegal origin of ivory products found for sale in the market and on that basis obtain such specimens for further forensic testing (Mr. Adisorn Noochdumrong, Deputy Director General, Department of National Parks, Wildlife and Plant Conservation to Tom Milliken, pers. comm., 12 September 2016). As the Elephant Ivory Act places the burden of proof for establishing the legal provenance of ivory products on their owners, failure to produce compelling evidence to assert legality would result in the seizure of the product in question. Seized items can then be forensically tested using DNA methods to establish the elephant species from which the product originated and the results of such tests would be admissible in Thailand’s courts as evidence, if prosecution becomes necessary.

As a result of market monitoring and testing, DNP reported that a number of outlets have been closed down for selling African Elephant ivory products and many others have terminated displaying and selling ivory in the country’s physical markets because they fear being compelled to prove the legal origin of their ivory. Whilst it remains unclear how this development relates to the market survey results in this report, these trials nonetheless serve as proactive illustration of the deterrent value of market surveillance when linked to burden of proof consequences on the retail ivory vendors. Strict implementation of Thailand’s prohibition on any retail sales of African Elephant ivory products remains essential and must form part of Thailand’s continued effort in addressing illegal ivory trade.

Figure 7a (top): Number of average ivory products observed in Bangkok; 7b (bottom): Number of average shops observed selling ivory in Bangkok



■ Unregulated (Jan 2013 - Dec 2014)
■ Regulated (Apr 2015 - Jun 2016)



■ Unregulated (Jan 2013 - Dec 2014)
■ Regulated (Apr 2015 - Jun 2016)

In its report on the progress of the NIAP implementation, the DNP reports that 247 traders have been registered (CITES, 2015). In some cases, traders informed surveyors that they had registered their shops in order to conduct legal ivory trade and, in one case, the trader showed researchers the registration document. Some traders felt that the new registration process, which requires both traders and buyers to be registered, would affect their business as this added procedural requirements that were previously absent, and may serve to dissuade consumers. Other traders indicated that they should not be selling products to foreigners due to prohibitions concerning the carrying of ivory products across borders. Some traders felt that the registration process instituted by the government invited more Thai purchasers, while in the past clientele were predominantly foreigners from China, Japan, United States and Europe. Other vendors also declared that buyers will need to register with them upon purchase using their national Identification Cards; these vendors reported that they only sell to Thai nationals. One vendor claimed that the ivory from which skulls were carved (pictured in Figure 9) originated from domesticated Thai elephants and the seller was very open to discussing the carving quality and prices. These ivory skull carvings were not common in Bangkok's ivory market previously, and appear to be a new product type. Observations in the market by other TRAFFIC staff, however, has found Chinese speaking tourists purchasing jewellery, including earrings, which would be in violation of Thailand's regulatory policy.



Thousands of ivory products were recorded during Thailand's nationwide registration programme.

Figure 8: Trend in ivory product availability in Bangkok over 30 (non-consecutive) months between January 2013 and June 2016, against key milestones regarding Thailand's compliance with CITES and subsequent implementation against the National Ivory Action Plan process

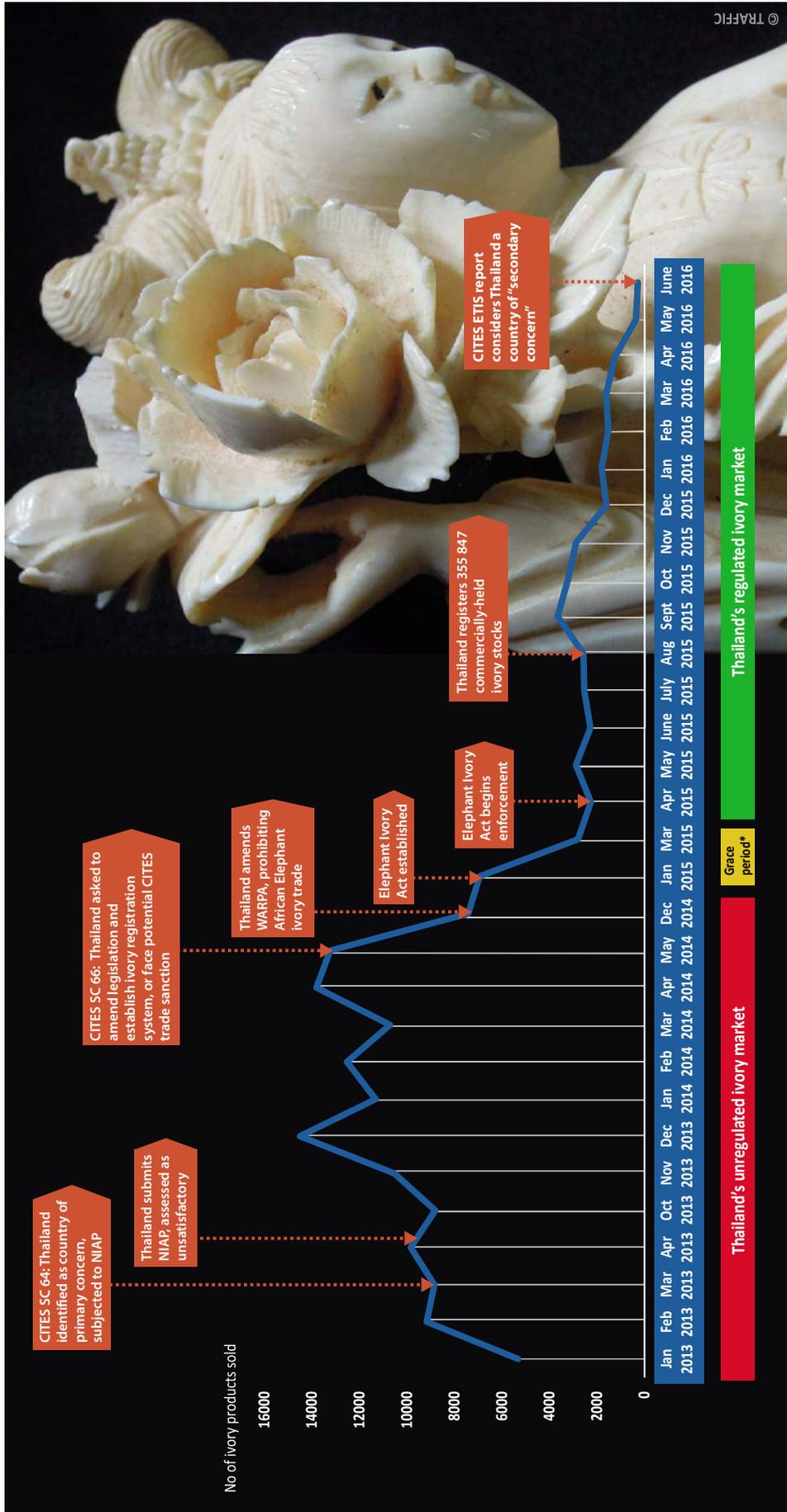


Figure 9: Ivory skull carvings that traders reported to have originated from domesticated Thai elephants



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Moving beyond Thailand's domestic market, vigilance at the airport, including the authorities increased frequency of passenger luggage inspections also seem to be yielding some results in curtailing illegal ivory trade in Thailand. The country's Elephant Ivory Act has also introduced a number of measures to better regulate domestic trade, including notably transportation of raw ivory between provinces, and a process has been established to monitor movement, including vehicles used to transport ivory, and the specific routes through which transport is allowed. This is all in addition to the registration process, with the aim of controlling illegal trade. The Thai government has also erected signs at its international airport, including in the Chinese language, warning tourists not to buy or take ivory products out of the country. However, monitoring and ensuing enforcement to counter trade activity occurring online is required and could be a factor serving to undermine the regulatory controls enacted by the Thai government.



A SHIFT TO ONLINE MARKETING AND SALE OF WORKED IVORY PRODUCTS

A separate study conducted by TRAFFIC between June and July 2016 found at least 2550 products being offered for sale online (Nguyen *et al.*, *in prep*). This survey monitored 22 Facebook groups, seven individual Facebook accounts and 13 Instagram accounts. A summary of findings is presented in Table 6.

Table 6: Summary of ivory trade observed on Facebook and Instagram from June to July 2016 in Thailand

Key Element	Findings
Monitoring Period	25 days (one hour every weekday from 20 June – 22 July 2016)
Number of Facebook Groups and Instagram accounts monitored	42 in total <ul style="list-style-type: none"> • 22 Facebook groups • 7 Individual Facebook accounts • 13 Instagram accounts
Number of posts offering ivory or elephant products	<ul style="list-style-type: none"> • 653 posts offering a total of 2550 ivory products • 56 posts offering non-ivory elephant products (such as tail, teeth, elephant oil/placenta)
Predominant product type for sale	Jewellery (48%)
Location of seller	A majority of the sellers appeared to note their location (of the post) as Bangkok, recording at least 31 individuals with 186 ivory items being offered for sale. This was followed by Surin (in north-eastern Thailand) at 14 individuals with a minimum of 462 ivory products offered for sale
Price	Prices that were shown in sale posts ranged from hundred to millions of Thai Baht (approximately USD2.90 to USD28 895).
Forms of communication	Facebook private message, Telephone call, Line Messenger, SMS/Text
Payment method type	Payment methods varied but most sellers requested a prospective buyer to transfer the agreed amount of money to their bank accounts after the deal. It was found that some sellers even provided their national identification card (ID card) details in order for them to directly be able to access and verify the items they were interested in purchasing.

Source: Extracted from Nguyen *et al.*, *in prep*.

The number of products recorded in internet trade (2550) was in fact higher than what was recorded over the last seven months in Bangkok's physical markets in the period from December 2015 through June 2016. The average number of ivory items recorded during those months was 1203 products, about half of what was observed during the internet survey, whilst even the highest number recorded in January 2016 (1800) is still less. The fact that a high number of products were

observed for sale online serves to confirm earlier concerns regarding a potential market shift from the physical marketplace to online platforms as has been the case in China (Xiao and Wang, 2015).

Figure 10: Bangles mixed with gold and other gemstones found for sale on Facebook in Thailand in July 2016



The internet has clearly evolved to become a key global platform facilitating illegal wildlife trade (Chng and Bouhuys, 2015; CITES, 2016; Krishnasamy and Stoner, 2016). In China, a TRAFFIC study in 2013 found over 115 elephant tusks, over 276 ivory segments, at least 77 whole rhino horns or pieces and at least 46 Helmeted Hornbill *Rhinoplax vigil* casques for sale on social media, over a one month period (Xiao and Wang, 2015). Movements of ivory trade to online trading platforms is clearly becoming a more popular choice for conducting business in endangered wildlife species, and this seems to be the case in Thailand too. For example, Thai authorities have made a number of arrests where Thai citizens were involved in the online sale of Burmese Star Tortoises *Geochelone platynota*, Leopard Cat *Prionailurus bengalensis*, Dusky Leaf-monkey *Trachypithecus obscurus* as well as ivory (Bangkok Post, 2015; CITES, 2015; Wildlife Conservation Society, 2015; Anon, 2016; Samart, 2016).



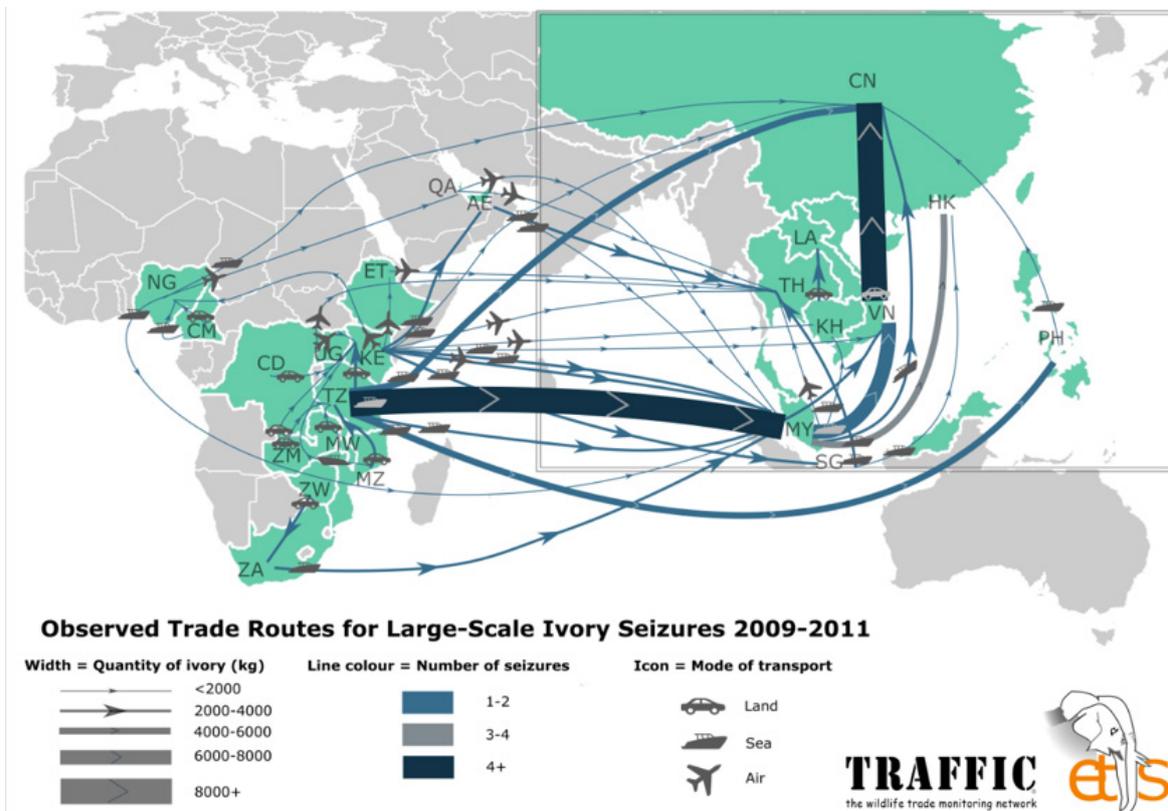
While a direct relationship with the situation in the physical market place is not yet established, the high presence of ivory trade on the internet is a worrying development in Thailand. A small number of traders noted that they were legally registered with the government to trade in ivory, but a vast majority of them did not provide this information in their posts. Research by TRAFFIC noted that only one post showed an ivory product was registered with the DNP, while a further 25 posts showed their ivory trading licenses (Nguyen *et al.*, *in prep*). This research also found that only a small number of traders claimed to have registered with the DNP, yet no proof of this was offered. Indeed, a vast majority of the posts did not mention any documentation or permits. It is also not yet clear if prices differ significantly online compared to the same products found in Bangkok's physical market, as internet traders usually ask prospective buyers to contact them via private messaging. The volume of products appearing for sale online is a concern especially since Southeast Asia has been noted to have some of the highest social network usage in the world (eMarketer, 2015). Cybercrime has been recognized by CITES, as described in the CITES CoP 17 Doc.29 regarding Combating Wildlife Cybercrime: "the growth of the internet has facilitated communication and commerce between individuals and institutions at a global scale, and there is a need to continually scale up efforts to address wildlife crime linked to the Internet" (CITES, 2016).

A shift in Thailand's raw ivory trade patterns

Thailand was identified as a "country of primary concern" in the ETIS analysis to CITES CoP16 owing to its role as an end-use destination for illegal consignments of ivory. In this regard, with some frequency, large-scale shipments of raw ivory were periodically being directed from Africa to Thailand for the production of ivory products sold on the domestic market. Whilst China was identified as the primary end-use destination globally, Thailand held the second most prominent position as an unregulated ivory market in Asia (Milliken *et al.*, 2012). Based on raw data of ivory seizures reported to ETIS, Figures 11 and 12 map the movements of large-scale ivory shipments that were 500 kg or more in two three-year periods of time.

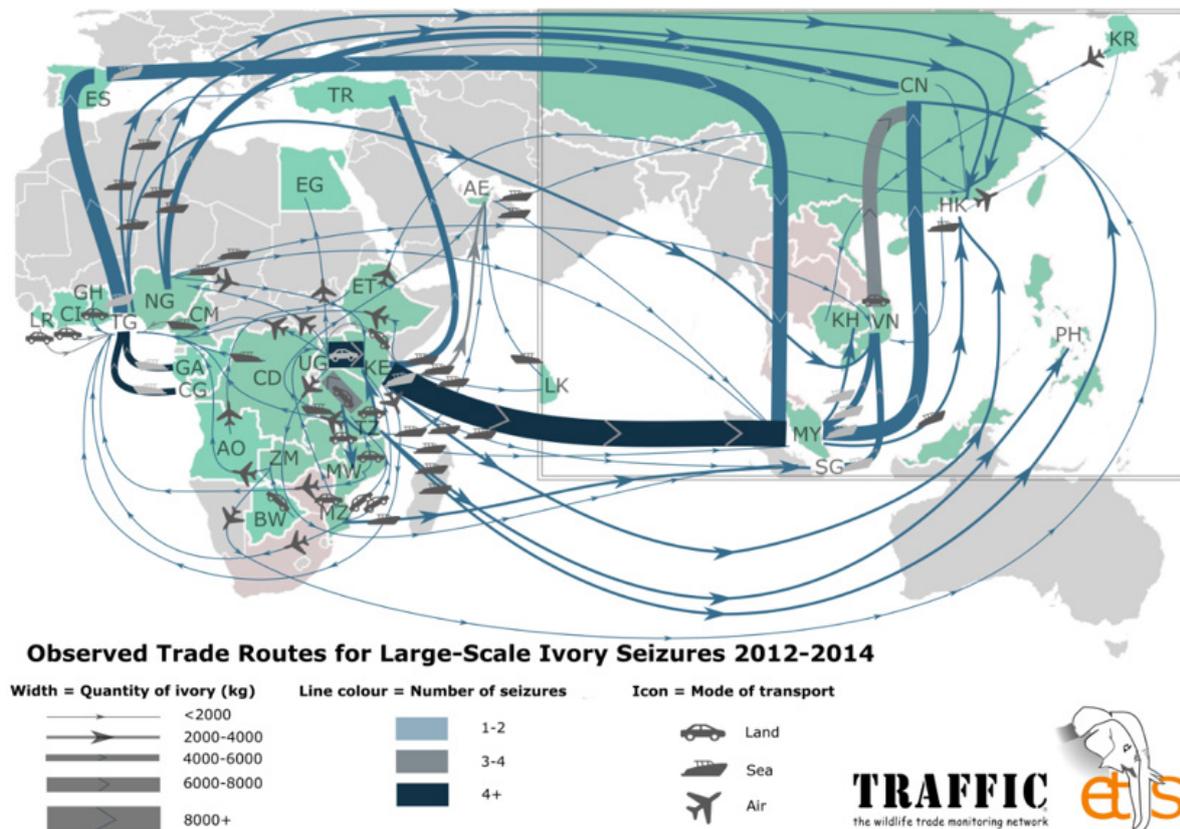
Figure 11 covers ivory trade flows in 2009-2011, which reflect the raw data used in the ETIS analysis to CITES CoP16, whilst Figure 12 addresses the years 2012-2014, which reflect the large seizures in the ETIS analysis to CITES CoP17. The trade routes depict the reported pathways these ivory consignment followed regardless of where the seizure itself actually occurred. In Figure 11, Thailand can be seen as the final destination for various shipments of ivory coming from Kenya, Uganda and Ethiopia in Africa, Qatar and the United Arab Emirates in the Middle East, and from Malaysia and Singapore in Southeast Asia. Whilst the scale of this trade is certainly less than what can be seen going into China, Thailand was nonetheless a significant destination.

Figure 11: Observed trade routes for large-scale ivory seizures, 2009-2011
(ETIS 25 January 2016)



In sharp contrast, in Figure 12, Thailand does not register as part of any trade chains for large movements of ivory that were seized and reported to ETIS in the more recent period, (hence, Thailand is not highlighted in green or labeled TH on the map). Whilst undetected consignments of ivory were certainly possible, if law enforcement effort remained constant in Thailand during this period, a real decline in the importation of raw ivory could have resulted. In fact, the country’s domestic ivory market was under constant attack in the build up to CITES CoP16 and then, following the momentous decisions under the Convention to launch a National Ivory Trade Action Plan process, the pressure only increased thereafter. The ETIS data seem to lend credence to the view that uncertainty about the future of local ivory industries resulted in a sustained lapse in further investment in raw ivory which potentially could become a future liability. In any event, largely because of the absence of large movements of ivory in the period 2012 through 2014, Thailand’s position in the ETIS analysis to CITES CoP17 changed to a “country of secondary concern” for the first time.

Figure 12: Observed trade routes for large-scale ivory seizures, 2012-2014
(ETIS 25 January 2016)



In 2015, movements of raw ivory to Thailand once again resumed but with a notable caveat. All three of the interdicted consignments which contained over 500 kg of ivory were in transit when they arrived in Thailand and were bound for the Lao People’s Democratic Republic, according to the shipping documentation. These seizures, which originated in Kenya, the Democratic Republic of the Congo and Nigeria, totalled 6052 kg of raw ivory (587 kg of pangolin scales were also seized from the Nigerian shipment). These seizures could be suggesting that the role of Thailand in the ivory trade may be changing to that of transit country, similar to Malaysia and Singapore; however ongoing monitoring will be necessary to confirm any such development.

CONCLUSION AND RECOMMENDATIONS

The affirmative decisions taken by the CITES Standing Committee to push the NIAP process have thus far led to positive results in terms of curtailing ivory trade in the markets of Thailand's capital city. The responsive efforts of the Thai government to promulgate and implement far reaching legislative and regulatory reform appears to demonstrate a considerable and progressive reduction in the number of ivory items observed for sale. This unprecedented transformation of Thailand's trade control policy for ivory is clearly evident in the marketplace; while there is little reason to believe that a resurgent physical market in Bangkok would arise in the future, this can only be achieved if strict implementation continues to unfold, along with adaptive management by law enforcement agencies in response to any shifts in trade trends, both involving physical markets throughout the country, as well as those occurring on online platforms. The new and greatly strengthened legislation in place effectively bans any and all trade in African Elephant ivory without exception. This legal basis, along with a suite of supportive regulatory measures to ensure compliance, has changed the situation markedly since the July 2014 CITES Standing Committee meeting where decisive action put Thailand on notice. Thailand now stands as an inspiring example of what can be achieved on a relatively short time scale to curtail and prevent illegal ivory trade in the context of the CITES-orchestrated NIAP process.

Thailand's challenge now is to consolidate and institutionalise the remarkable progress that has been made to date with focused attention on a number of key issues that remain to be addressed. The government's allowance of retail ivory sales to commence prior to the roll-out of an ivory marking system for products in the marketplace needs to be reconsidered. Whilst the overall effort taken to reach this stage in a fairly short period of time is admirable, Thailand's domestic ivory trade still requires attention to ensure that it fully complies with CITES requirements for domestic trade in ivory. Key issues to address, which therefore constitute priority actions for attention include:

- The roll-out of a robust product marking system to track the disposal of registered worked ivory products in the marketplace and ensure that unregistered products are not laundered into the system.
- Continuation of the random forensic DNA testing of products being sold in the market place to verify that they originate from Asian Elephants, as allowed by law. At the time of registration it was not possible for ivory to be forensically examined to differentiate African from Asian Elephant ivory. That challenge should now shift to the retail trade in Thailand, where spot checks need to continue on a regular basis to ferret out any illegal products in local markets. Such efforts are seen to be critical in demonstrating the integrity of Thailand's management system for legal ivory trade. TRAFFIC stands prepared to work with the Thai authorities to undertake DNA testing to ensure the highest levels of compliance with the new policy framework.
- Ongoing physical market monitoring in Bangkok, including a revisit of shops that have claimed to have shut their businesses down, must continue. Efforts thus far have been instrumental in tracking the impact of policy, regulatory and law enforcement interventions in the marketplace.
- Monitoring of other notable ivory trade locations in Thailand outside Bangkok (such as the provinces of Surin, Uthai Thani and Nakhon Sawan) to document any possible shift of market availability from Bangkok. Subsequent law enforcement as necessary will be equally important to maintain deterrents to illegal activity. Monitoring by Thai government authorities of any possible shift of ivory stocks from Thailand into neighbouring countries with active market availability, such as Lao PDR or Viet Nam, will be important for regional co-operation in response to changes in ivory trafficking dynamics.

- The regular monitoring of ivory trade occurring on the internet and social media in Thailand needs to continue, both law enforcement agencies as well as NGOs, and appropriate law enforcement strategies need to be developed for this avenue of ivory trade. Internet and social media trading poses and clear threat to Thailand's ivory trade controls and will require focused attention to combat effectively. Measures to scale-up enforcement action should include engagement with relevant social media platforms (such as Facebook), search engines and e-commerce platforms.



Thailand crushed two tonness of confiscated ivory in August 2015.

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

For further information contact:
Telephone: (603) 7880 3940
Fax: (603) 7882 0171
Website: www.traffic.org

TRAFFIC
Southeast Asia Regional Office
Unit 3-2, 1st Floor, Jalan SS23/11
Taman SEA, 47400 Petaling Jaya
Selangor, Malaysia

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