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**More Ivory than  
Elephants:  
Domestic Ivory  
Markets in Three  
West African  
Countries**

Prepared by

**Marianne Courouble,  
Francis Hurst and  
Tom Milliken**

**TRAFFIC  
East/Southern Africa**

**December 2003**



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# More Ivory than Elephants: domestic ivory markets in three West African countries

*Prepared by*

Marianne Courouble, Francis Hurst and Tom Milliken

**TRAFFIC East/Southern Africa**

*December 2003*

Credit: South African Police Services



Confiscated ivory name seal blanks

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## EXECUTIVE SUMMARY

*Marianne Courouble, Francis Hurst and Tom Milliken*

Surveys of African ivory markets in 1999 identified Abidjan (Côte d'Ivoire), Dakar (Senegal) and Lagos (Nigeria) as the most significant ivory carving centres in West Africa (Martin and Stiles, 2000). This report serves to update the situation in these three countries and to assess whether or not any progress has been made in establishing effective control of their domestic ivory markets. The following results stem from field surveys which were conducted by two researchers between 11<sup>th</sup>-30<sup>th</sup> June 2002.

### CÔTE D'IVOIRE

- Domestic trade in ivory was officially banned in Côte d'Ivoire in 1997 through *Decree No. 97-130*. Marking an important evolution in the country's wildlife legislation, the Decree introduced measures to regulate the possession, sale and movement of ivory within the country and across international borders. Implementation and enforcement responsibilities principally lie with the Directorate of Wildlife and Fisheries under the Ministry of Water and Forests. In 1998, regulatory measures to register and record national ivory stocks identified 7,110.7 kg of ivory in the hands of some 224 owners. However, this exercise was never fully completed and additional stocks of ivory are believed to be in the country.
- In spite of an improved legal basis from which to act, effective implementation has faltered. At present, wildlife authorities are constrained by insufficient financial and human resources, a lack of motivation toward the development of effective monitoring and co-ordinated law enforcement systems nationally, and poor collaboration with other law enforcement bodies, especially Customs. Currently, Water and Forests agents are prevented from having regular access to passenger and luggage clearance areas at the international airport in Abidjan. With generally weak government institutions, widespread corruption and, most recently, civil unrest and warfare, the current political environment affords many difficulties for implementing ivory trade controls at any level.
- Despite the official national trade ban, the ivory industry of Côte d'Ivoire is still very active, although it appears to have declined to some extent. Surveys conducted between 11<sup>th</sup>-20<sup>th</sup> June 2002 in and around Abidjan and Grand Bassam found 68 retail outlets, displaying an estimated 1,554 kg of mostly worked ivory products. Eleven ivory workshops were also identified in the study, employing an estimated 88 craftsmen, most of whom carve ivory on a part-time basis.
- Compared to Martin and Stiles (2000), the present survey documents a smaller, but still significant, volume of ivory on sale in the country's retail market. The current study also shows a shift toward greater diversification by manufacturers and carvers to wood products, and fewer people appear to be involved in the ivory industry today. However, these results may be skewed by the fact that the current survey was conducted during a period of continuing political unrest and disruption of the country's tourist industry.
- Owing to political instability and a reduction in the number of tourists visiting or expatriates living in the country, far fewer ivory consumers were observed when compared to the situation described by Martin and Stiles (2000). Tourists and expatriates were still noted as important consumers, with Europeans (particularly French), Chinese, Japanese and local African businessmen, including Senegalese traders, all mentioned. Surprisingly, Americans were mentioned more frequently as ivory buyers than French nationals. Asian diplomats were also cited for their involvement in the ivory trade, and it was alleged that many of their purchases were for resale purposes abroad.
- The price of raw ivory, now averaging about CFA70,000-75,000/kg (USD115-123/kg), appears to have doubled in three years, and the retail market prices of worked ivory products in Côte d'Ivoire have increased by the same proportion when compared to the situation documented by Martin and Stiles (2000). However, if adjusted using the Gross Domestic



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Product Deflator inflation index, in 2002 USD terms, prices have increased between 50-180%, with an average increase of 87% found. A recent decline in raw ivory on the local market is partially responsible for this increase.

- The country's ivory traders continue to be supplied by ivory of illegal origin, in particular from Central African sources, especially the Democratic Republic of the Congo, Cameroon, Gabon and the Central African Republic. Prior to its closure in the face of bankruptcy, Air Afrique appears to have been a principal conveyor of illicit ivory from Central African sources, and entry into Abidjan is alleged to have involved collusion with Customs. To a much lesser extent, some ivory is obtained from the illegal killing of elephants within the country. With the increasing scarcity of supply and the current high price of raw ivory, privately-owned stocks in Côte d'Ivoire are also being accessed as a new source of raw ivory for the national industry.
- The decline of the local ivory industry noted in the current study is most probably related to the current political context, the subsequent decrease in tourist numbers and increasing difficulty in securing adequate stocks of raw ivory, rather than recent policy initiatives by the government to control the ivory trade. In this regard, until the government demonstrates sufficient political will to effectively monitor and police the ivory trade taking place within and through the country, illegal trade is expected to continue.
- There is little evidence to suggest that the conditions noted in Resolution Conf. 10.10 (Rev.) for control of the internal trade in ivory are being met and implemented effectively. Further, participation in the Elephant Trade Information System (ETIS) has been sporadic and very few data on elephant product seizures have been communicated through the process of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

### SENEGAL

- The *Hunting and Wildlife Protection Act* (1986), *Law No. 86-04* (24 January 1986) and the related implementation *Decree No. 86-844* (14 July 1986) form the legal basis for wildlife management in Senegal. These legal instruments, however, only indirectly address trade in elephant products, and the situation governing domestic trade in ivory remains legally vague and ambiguous. The Directorate of Water, Forests and Hunting in the Ministry of Water, Forests, Hunting and National Parks is responsible for implementation and enforcement of these laws.
- Law enforcement is very weak as no legislative or regulatory measures have been taken to identify, record and control possession or disposal of raw ivory or worked ivory products in the country. A lack of human, material and financial resources were all cited as reasons for a poor record of enforcement, but this situation is compounded by the fact that Customs routinely deny Water and Forest agents any access to the country's ports of entry. In sum, it appears that control over ivory is more lax today than it was during the Martin and Stiles (2002) survey in 1999.
- The trade in ivory in Senegal is not an isolated economic activity, but rather is linked with other trade in wildlife products, in particular wood and reptile skins. The major ivory traders encountered during this survey all trade in other wild products. Dakar is the centre of the trade in ivory in Senegal, and is generally regarded as one of the most important centres of wildlife trade in West Africa. Within Dakar, the craft centre of Soumbédioune is the hub of this activity and the final point of distribution for many of the products collected by Senegalese traders circulating throughout West and Central Africa. Characteristically, ivory trade is a family business in Senegal, with many small household workshops, and often members of the same family are found trading ivory in neighbouring countries, especially Côte d'Ivoire.
- The trade in ivory is protected by powerful lobbies in Senegal. There are allegations that some important and powerful religious leaders, known as Marabouts, are involved in trade in wildlife products, including ivory. The major traders found in the Soumbédioune market are

also organised into a guild, the “Federation of the Craftsmen of Soumbédioune”, which has significant economic and political clout. Corruption is another factor, with various allegations suggesting Customs, businessmen, religious leaders, and government officials are involved in the illegal ivory trade.

- Surveys conducted between 21<sup>st</sup>-30<sup>th</sup> June 2002 in Dakar, Saly and Mbour found 54 ivory retail outlets, featuring an estimated 353 kg of mostly worked ivory products for sale. These shops employed about 70 people, while another six ivory workshops were identified that employed 31 carvers. Senegal probably imports more worked ivory than it actually produces locally, and there is evidence to suggest direct linkages to the production and trade in ivory with Côte d’Ivoire.
- Compared to Martin and Stiles (2000), the present survey documents a smaller volume of ivory on display in the retail market than what was found three years ago. That survey estimated 407 kg of ivory on display in Dakar, while the present survey found 330 kg (in Dakar only). However, the present survey identified 14 more retail outlets (44 compared to 30), but the same number of workshops in Dakar. Apart from the reduced volume of ivory on display, there is no other evidence to suggest a significant decline for domestic trade in ivory in Senegal, and the ivory traders themselves did not complain about any reduction in their activities in recent years. For these reasons the situation is believed to be relatively stable. In addition, this study found larger pieces of ivory being sold than was the case three years ago, perhaps suggesting increased laxity in law enforcement.
- The ivory found on the retail market in Dakar is not only sold as souvenirs and curios to European tourists, but it is also purchased by Korean, Chinese, Senegalese Marabouts and a few European traders for resale purposes elsewhere. Traders also claimed that Chinese diplomats based in Dakar are frequent clients.
- The average price for worked ivory products in Dakar appears to be slightly higher than what was observed three years ago, and remains slightly higher than current prices for similar ivory products in Côte d’Ivoire. The price of raw ivory in Senegal ranges between CFA70,000/kg (USD115/kg) for poor quality ivory to CFA100,000/kg (USD164) for better quality pieces, with CFA80,000/kg (USD139/kg) an average mid-range price. This price range is considerably higher than the estimated USD100-120/kg in 1999 cited in the Martin and Stiles (2000) report, indicating an increase over the last three years. Adjusted into 2002 USD terms using the Gross Domestic Product Deflator inflation index, the price has increased between 24-30% over the last three years. The price of raw ivory in Senegal is at least 15-20% greater than the price of ivory in Côte d’Ivoire, a finding related to the fact that Senegal lies further west from most active sources of raw ivory.
- The majority of the ivory found on the domestic market is imported illegally. More than half of the worked ivory on sale was reportedly obtained from Côte d’Ivoire and, to a lesser extent, from Guinea, Cameroon, Democratic Republic of the Congo and Gabon. The raw ivory carved in Senegal reportedly originates in Central Africa, particularly Cameroon, Democratic Republic of the Congo, Gabon and Central African Republic, although Kenya, Sudan and even China were also mentioned as sources. Côte d’Ivoire was also cited as a source for raw ivory, however, it is suspected that raw ivory shipments are most probably only transiting that country and actually originate elsewhere. The supply of raw ivory in Senegal is said to be increasingly scarce and sporadic.
- Both worked and raw ivory is regularly conveyed by plane to Dakar and, until December 2001, most transport allegedly involved Air Afrique, which has since ceased operations. Another route is the main road coming from Guinea, passing through Medina-Gounas, on the east side of the Niokolo Koba National Park, and going north to Dakar. On occasion, ivory also enters Senegal via the port of Dakar, among large shipments containing other wildlife products for distribution and sale in Dakar. With respect to all trade routes, various sources alleged that traders regularly collude with Customs to facilitate the entry of illicit ivory into the country.

- Senegal is not implementing the conditions noted in Resolution Conf. 10.10 (Rev.) for control of the internal trade in ivory. In terms of participation in ETIS, government officials have never yet submitted a single elephant product seizure case through the CITES process. Whether this reflects poor administrative engagement or a total lack of law enforcement with respect to ivory remains to be seen.

## NIGERIA

- Nigeria is a Federal Republic consisting of 36 States and the Federal Capital Territory of Abuja. The *Endangered Species (Control of International Trade) Decree No. 11* (1985), a Federal piece of legislation under the auspices of the Ministry of Environment, serves to enable CITES implementation in Nigeria and, as such, ostensibly controls the trade in ivory. The African Elephant *Loxodonta africana*, however, continues to be listed in Schedule II of the Decree, which allows for hunting, trade, importation and exportation of listed species under license. A number of individual States in Nigeria have enacted compatible legislation that also concerns the killing of elephants and trade in elephant products, while many others have not. Where there is no State law, *Decree No. 11* should prevail, but the situation on the ground often remains ambiguous and confused.
- In compliance with CITES and pursuant to *Decree No. 11*, the designated Federal authorities have reportedly not issued any licenses for any trade in elephant products since 1990, thus there has been no officially-sanctioned import or export of ivory since the CITES trade ban took effect globally. Regardless, in the face of repeated evidence, it is recognised that trade in ivory in a variety of forms is widespread in Nigeria and the Decree is currently under review.
- With a complicated and often ambiguous legal situation at hand, enforcement efforts on behalf of *Decree No. 11* are effectively non-existent. An early attempt to register ivory stocks, prior to when the CITES trade ban took effect in 1990, was poorly executed and apparently no data from that attempt is currently available. Importantly, since 1991, government agents directly charged with implementing *Decree No. 11* have been denied access to the country's ports, airports and border posts during a *Ports Reform Exercise* promoted by the military government. Not surprising, there appears to have been very little, if any, legal action taken against the country's ivory importers, exporters or traders since that time. Moreover, there are numerous allegations that the Customs Service is, in some instances, complicit in the illegal trade in ivory.
- A significant trade in ivory continues in Nigeria for a variety of economic and cultural reasons. Surveys conducted between 15<sup>th</sup>-26<sup>th</sup> June 2002 in Lagos, Abuja, Kaduna and Kano identified 42 retail outlets, displaying an estimated 2,118 kg of worked ivory products. At the same time, two workshops were also identified in the Lagos area, with one employing five ivory carvers, but suggestions of other ivory carving operations in Onitsha, Benin City and Port Harcourt could not be substantiated as the primary researcher was unable to visit these locations.
- The domestic trade in ivory appears to be growing in Nigeria, particularly its commercial capital of Lagos. Martin and Stiles (2000) counted 40 outlets in Lagos with an estimated 1,742 kg of ivory products on display in 1999. The current study found a minimum of 31 retail outlets in Lagos, carrying an estimated 1,990 kg of worked and raw ivory. This indicates an upward trend in the availability of ivory in Nigeria, however, differences in survey methodologies could possibly account for part or all of the increase in observed ivory. At the very least Nigeria's ivory trade is not decreasing.
- Nigerians directly engaged in the ivory industry were principally Hausa or traders from around Onitsha in the eastern part of the country. A third group of traders were Malians who were long-term residents in Lagos. As identified by local vendors, the principal buyers of ivory were Americans, Chinese, Italians, Japanese and Koreans. Chinese and Lebanese buyers were alleged to sometimes be engaged in large-scale 'container' exports of ivory presumably for resale purposes, and on eleven occasions it was mentioned that diplomatic staff could be used to export large items of ivory such as whole tusks.

- Unadjusted prices for raw ivory in Lagos were found to range from NGN3,200-4,800/kg (USD24-36/kg), depending on the size and quality of the piece, with USD30/kg regarded as the average benchmark price. Martin and Stiles (2000) stated that in 1998 the price of raw ivory in Lagos had been USD30/kg and had risen to USD46–50/kg in 1999; this significant increase in price was attributed to either an increase in demand or a decrease in supply, with the latter reason being the more likely. When viewed in 2002 USD terms using the Gross Domestic Product Deflator inflation index, the value of ivory has dropped by 50% since 1999. If there has been an upward trend in availability, then an increased supply of ivory seems to partially explain this development.
- In line with the findings of previous studies, most of the raw ivory entering the Nigerian markets is illegally imported from Central African sources, particularly the Democratic Republic of the Congo, Congo (Brazzaville), Cameroon, Central African Republic and Gabon, according to a variety of sources.
- The conditions noted in Resolution Conf. 10.10 (Rev.) for control of domestic ivory markets are not being implemented in Nigeria. As Nigeria has been identified as one of the world's large-scale unregulated ivory markets and is presently subjected to an intersessional process under CITES Decision 12.39 to demonstrate compliance with this Resolution, the results of this study are very worrying. Unless rapid action to amend the situation is taken, Nigeria could see sanctions imposed on its wildlife trade at the next meeting of the CITES Standing Committee in March 2004. Participation in ETIS has also been poor, although some records of elephant product seizures have been submitted, but none of the data is more recent than 1991.

## RECOMMENDATIONS

The domestic ivory trades in Côte d'Ivoire, Senegal and Nigeria all remain unregulated, all subvert international trade controls under CITES and all lead to the illegal killing of elephants, especially in Central African countries from which most ivory originates. National attempts to assert control over the trade in ivory in each of these countries have been short-lived and have failed. Only through international oversight and pressure is change likely to be forthcoming in an expedient manner. Recommendations that need to be implemented in each of the countries surveyed are issued at the end of this report in order to:

- improve policy, legislation and regulatory measures;
- address implementation and enforcement deficiencies;
- enhance ivory stock management;
- monitor ivory manufacturers, wholesalers and retailers; and,
- implement ETIS.

West Africa's ivory markets continue to pose serious challenges to the implementation of CITES and to the effective conservation of elephants throughout the African Continent.

## INTRODUCTION

*Tom Milliken*

West Africa's long colonial history, which included a thriving trade in ivory, resulted in the collapse of most elephant populations by the early 20<sup>th</sup> century (Blanc *et al.*, 2003). Since then, human population increase and the subsequent conversion of extensive portions of both forest and savanna habitats to other land use purposes has resulted in extreme fragmentation of elephant range. Today, elephant distribution accounts for about 4% of the region's area of 5,096,660 km<sup>2</sup> (Blanc *et al.*, 2003). Similarly, the approximately 220,000 km<sup>2</sup> of elephant range in West Africa represents only 4% of all remaining elephant range in Africa (Barnes *et al.*, 1999; Blanc *et al.*, 2003).

Likewise, elephant populations in this region are generally compressed, small, and isolated, and remain poorly surveyed in most of the 13 countries in which they occur (Barnes *et al.*, 1999). Using the IUCN system of categorizing elephant numbers, the data for all West African countries suggests the following figures: 5,458 'Definite', 1,188 'Probable', 3,039 'Possible' and 3,498 'Speculative' (Blanc *et al.*, 2003). Thus, not more than 13,200 elephants are believed to occur in West Africa, and there is a real concern that many elephant populations are not viable in the long term owing to their small size and genetic isolation. In spite of the low numbers, increasing human population growth and settlement within elephant range has led to a serious prevalence of human/elephant conflict.

Against this backdrop of very few and probably declining elephant populations, many West African countries continue to harbour major domestic ivory markets. At the international level, all African Elephant populations were listed in Appendix I of CITES in January 1990 and all commercial international trade was ostensibly prohibited. At the time, many believed that as a direct consequence of this development, tourist sales of ivory in Africa's curio markets would wane appreciably (Dublin *et al.*, 1995). But CITES, by definition, does not specifically curtail trade in ivory at the domestic level. As a result, after the international ban, ivory continued to be sold legally in many African countries, including Côte d'Ivoire, Senegal and Nigeria.

Within CITES fora, West African governments have generally continued to advocate strict protection for elephants by supporting the maintenance of the Appendix I listing. This posture, however, has not been accompanied by subsequent moves nationally to curtail domestic trade in ivory. Moreover, the anomaly of turning a blind eye to large-scale and highly visible ivory trade at the national level has continued with impunity for more than a decade. Throughout the region, there is little evidence to suggest implementation of Resolution Conf. 10.10 (Rev.) (*Trade in Elephant Specimens*), which specifies a number of regulatory measures that need to be in place to ensure that domestic trade in ivory does not produce detrimental impacts elsewhere. In this regard, Resolution Conf. 10.10 (Rev.) recommends that member States:

*register or license all importers, manufacturers, wholesalers and retailers dealing in raw, semi-worked or worked ivory products; and,*

*introduce recording and inspection procedures to enable the Management Authority and other appropriate government agencies to monitor the flow of ivory within the State, particularly by means of:*

*i) compulsory trade controls over raw ivory; and,*

*ii) a comprehensive and demonstrably effective reporting and enforcement system for worked ivory.*

The linkage between domestic ivory markets and continuing illegal killing of elephants and trade in ivory is firmly established (Milliken *et al.*, 2002a). With so few elephants of its own, the situation in West Africa is of concern for two major reasons. Firstly, the scale of the trade could conceivably lead to the systematic extirpation of local elephant populations in the region. Secondly, if local elephants disappear altogether, or even if they are sufficiently protected but they are ignored because of such low population densities and not specifically targeted for ivory, local ivory markets could effectively become dependent upon sources of ivory from outside the region. Such trade is necessarily a persistent violation of CITES and undermines conservation efforts elsewhere within Africa.

In 1999, Esmond Martin and Daniel Stiles undertook the first major study of African ivory markets in the post-CITES ban period, including an examination of the situation in three West African countries, Côte d'Ivoire, Senegal and Nigeria (see Martin and Stiles, 2000). Their report concluded that "there is a moderate illicit movement of tusks from the Democratic Republic of the Congo, Central African Republic, Cameroon and Gabon westwards to the ivory carving centres of Abidjan, Lagos and Dakar" (Martin and Stiles, 2000). These three markets were postulated as the most significant ivory centres in West Africa, with Abidjan displaying "the largest quantity of worked ivory (over 20,000 items)" amongst all of the 13 countries surveyed (Martin and Stiles, 2000). At the same time, Lagos was identified as "the only city where the quantity of ivory displayed and the number of outlets had increased between 1989 and 1999", adding that the actual trade in worked ivory was "slow everywhere except Lagos and Abidjan" (Martin and Stiles, 2000). These results were cause for concern.

ETIS, one of the two official monitoring systems for elephants under CITES, has also highlighted ivory trade concerns in West Africa. Through a comprehensive analysis of over 7,100 ivory seizure records from all over the world, the ETIS report to the 12<sup>th</sup> meeting of the Conference of the Parties to CITES (CoP12) singled out Nigeria and Côte d'Ivoire as two West African countries that are heavily engaged in the illicit trade in ivory (Milliken, 2002). The data showed that neither Nigeria nor Côte d'Ivoire had ever made *and reported* an ivory seizure to ETIS, but these two countries were implicated in 398 and 97 ivory seizures, respectively, which had occurred elsewhere in the world since 1989 (Milliken *et al.*, 2002a). In terms of volume, the data for Nigeria involved seizures totalling 10,347 kg of ivory, while for Côte d'Ivoire the volume totalled 2,601 kg of ivory. Although on a different scale than the other two countries, the ETIS data also showed that Senegal had never made *and reported* any seizures itself, but had been associated with 34 seizures reportedly made by other countries around the world (Milliken *et al.*, 2002a).

Presentation of the analytical results of ETIS at CoP12 led to the adoption of Decision 12.39. In this decision, the Parties agreed to subject ten countries with large unregulated ivory markets to an intersessional process under the direction of the CITES Standing Committee to assess compliance with the regulatory requirements of Resolution Conf. 10.10 (Rev.) pertaining to internal ivory trade controls. Nigeria was identified as one of the countries included in this decision. The CITES Secretariat is tasked with compiling a report on the degree of regulation in these countries for consideration at the 50<sup>th</sup> meeting of the Standing Committee. In early 2004, the Committee will review the Secretariat's report and those countries which fail to demonstrate compliance could face CITES sanctions in the form of a wildlife trade ban. With these developments, CITES is finally taking the issue of unregulated domestic ivory markets seriously.

While TRAFFIC lacks a regional trade monitoring programme in West Africa, it is apparent that the region is very important and remains a challenge to international efforts to curb illicit trade in ivory. For this reason, TRAFFIC East/Southern Africa agreed to co-ordinate a detailed update of the ivory markets in Côte d'Ivoire, Senegal and Nigeria. This effort was funded and supported by the WWF African Elephant Programme. The purpose of these studies is to update the situation in these three countries since the Martin and Stiles (2002) study in 1999, and to assess whether or not government authorities have made any progress in terms of effective regulation of their domestic ivory markets. This study necessarily feeds into the larger global push under CITES against unregulated domestic ivory markets. This timely look at the role West African ivory markets play in undermining CITES and international ivory trade controls in other parts of Africa is yet another step in the long road to achieve effective elephant conservation in all parts of the African continent.



## A WORD ON THE METHODOLOGICAL APPROACH

*Marianne Courouble and Francis Hurst*

To ensure compatibility between the case study assessments of each of the three West African countries visited, it was necessary to develop a similar methodology and survey technique that could be applied in a fairly uniform manner. In this regard, the two principal researchers met for four days, from 11<sup>th</sup>-14<sup>th</sup> June 2002 in Abidjan, Côte d'Ivoire, to survey a number of boutiques, market stalls, shops and workshops jointly. By assessing a number of 'real life' situations together, it was possible to develop and agree a common methodological approach so that all three case studies could proceed on a similar basis regardless of where or when they took place.

The data collected during market surveys in all three countries included the following:

- the number of outlets selling ivory products;
- the quantity of ivory on display;
- the type of ivory products and their retail price;
- the source of the ivory;
- information on the shop owner;
- information on frequent consumers;
- the number of carving workshops;
- the number of carvers and whether they work ivory on a full-time or part-time basis;
- the source and price of raw ivory; and,
- comparative information about the status of these operations now compared to the past.

Concerning this last point, so that some kind of comparative analysis on the scale and status of these ivory markets would be possible, it was an outright objective of the current survey to identify and survey the locations mentioned in Martin and Stiles (2000). In their report, the location of the markets and shops they surveyed is generally clearly noted, thus it was possible to retrace their steps in a credible manner. At the same time, new locations were also visited and assessed if such information became known during the course of the survey. Such instances are mentioned in the country chapters of this report.

In addition to market survey data and observations, the present study provides an updated analysis of legislation and policy on trade in ivory and other elephant products in each of the countries examined. The study also comments on the implementation of the ETIS and compliance with CITES requirements for domestic trade in ivory in Côte d'Ivoire, Senegal and Nigeria.

It is important to note that, in West Africa, June is not the best time of year to undertake field surveys as the rainy season has commenced, ushering in the low season with respect to tourism. The availability of the principal researchers to conduct field work during this period, however, necessitated a schedule at this time. (It should also be noted that the Martin and Stiles (2002) study in 1999 was conducted at a similar time of the year). The main consequence of this timing was that the principal researchers were generally the only potential buyers in the shops and markets that they visited. This gave rise to certain difficulties, as the researcher became the focus of unmitigated attention, resulting in considerable pressure to buy ivory. In the face of such attention, it was not always possible to gather all the data listed above for every outlet or workshop visited without raising suspicion. Often, covert techniques were necessary due to the caution exercised by the traders and carvers in discussing the details of the ivory industry in their countries. As such, it was necessary to pose as potential traders with an interest in ivory. Using this cover, it was possible to ask many questions that would otherwise not be possible, and the end result was considered to be more fruitful in terms of the quantity and quality of information obtained. It should be noted, however, that at *no time* was any ivory product actually purchased during the course of this study.

The number of outlets and the quantity of items on display sometimes presented a problem for the researchers to accurately assess numbers, price and the weight of the ivory products observed for sale. In some cases, the same market or shop/workshop complex had to be visited two or three times to arrive at the best possible assessment. It was not always possible to make accurate notes during the

actual surveying, and any figures given in the three case studies are therefore estimates unless otherwise specified.

Ranging from unique large sculptures to hundreds of tiny, mass-produced trinkets of perhaps 1 cm in size, the sheer volume and variety of ivory products on display in some retail outlets posed many challenges to accurate counting. In such cases, it was decided that counting all items individually was impractical, if not impossible, as inevitably the resulting numbers would not be accurate. Instead, the volume of ivory on display was estimated. In this regard, large items were scored individually and estimates of weight and dimensions were made. For example individual tusks, large figures, busts or other such items were noted and recorded (unless specified) to exact numbers. For such items, prices were recorded as the initial asking prices and an indication of the final price is given where the researchers entered into bargaining. For smaller items, it was only possible to assess numbers of items by size categories. Thus, weights are approximations, prices are averaged and counts are estimates (unless otherwise stated).

In outlets displaying large quantities of ivory, the researchers used the following technique to estimate numbers. An area, such as a shelf containing ivory items of approximately the same size and shape or style, was scored. This was then used to calculate, through replication, the remaining amounts of ivory within this category. Very distinctive pieces such as large heads, or unique carvings were scored individually. Estimates of weight were then extrapolated from these results. Prices were then requested from the sales assistants or shop owners. Styles of carvings were recorded as they form a useful reference point, and additional information on sources or the history behind a particular ivory item was also recorded.

All ivory observed during the survey was classified according to the CITES Ivory and Elephant Product Seizure Data Collection Form:

**Raw ivory** – refers to whole tusks which remain in a raw state or whole tusks which may derive from sport hunting or other activities, including those that are mounted or polished. In addition to whole tusks, raw ivory includes tusks that have been broken or cut into pieces, but otherwise have not been shaped or processed.

**Semi-worked ivory** – refers to ivory that has been shaped or processed to some extent but which will undergo further processing at a later stage. Examples would include ivory blocks that have been fashioned into name seal blanks, but are not yet finished products.

**Worked ivory** – refers to carved or manufactured ivory items that are finished products. Examples would be piano keys, chopsticks, game pieces (e.g. chess sets, mah jong pieces, billiard balls, etc.), carvings composite sculptures, and other finished products.

**Fresh ivory** – refers to ivory that is deemed to have been recently poached. Such ivory typically has blood or particles of flesh attached to it, does not show evidence of discolouration or cracks from ageing, and sometimes exhibits sharp (as opposed to worn or blunt) edges on the lip cavity end of the tusk when it was removed from the animal using an axe, machete or other sharp tool.

**Old ivory** – refers to ivory that is deemed to have been held in storage for a considerable amount of time, typically exhibiting a weathered appearance with discolouration, cracks and brittleness as noticeable features. This includes antique pieces although care must be taken as during this study a number of carved pieces were encountered which been stained to make them appear as antiques, presumably to add value.

In sum, the methods used in this survey are roughly comparable to those employed by Martin and Stiles (2002) in the surveys they conducted throughout 13 African countries in 1999. As stated, this was done in order to establish a comparative basis between this important earlier work and the present study. Both studies rely to a considerable extent upon subjective and anecdotal information obtained from ivory traders, manufacturers and vendors that can not always or easily be verified for accuracy through quantitative data sources or other means. Further, both studies probably suffer to some extent from issues of accuracy in terms of recalling what was actually observed at each location during ongoing market surveys. The purpose in all of this, however, is not to establish absolute values in



## More Ivory than Elephants: domestic ivory markets in three West African countries

terms of ivory trade volumes, but rather to offer robust snapshots of current market dynamics that are generally indicative of overall market trends and conditions. As such, this report offers an update on the situation in three important countries which were previously identified as the leading domestic ivory markets in West Africa (Martin and Stiles, 2000).

## DOMESTIC IVORY TRADE IN CÔTE D'IVOIRE

*Marianne Courouble*

### 1. BACKGROUND

The large-scale conversion of forest to cultivated land, a process that commenced at the turn of the 20<sup>th</sup> century and continues through to the present, has resulted in a profound fragmentation of Côte d'Ivoire's population of African Elephants. Now believed to occur in some 24 separate locations in the country, the status of the species is poorly known as there has been very little survey work in recent years (Barnes *et al.*, 1999; Blanc *et al.*, 2003). According to the most recent estimates using the IUCN African Elephant Database population data categories, Côte d'Ivoire has a very small elephant population, with only 63 in the 'Definite' category, another 360 considered 'Possible' and a further 666 in the 'Speculative' category (Blanc *et al.*, 2003). Although most elephants occur in protected areas, many small and isolated populations are probably not viable in the long term, particularly if their sex ratios have become skewed from the effects of poaching for ivory (Blanc *et al.*, 2003). In some locations, crop raiding provokes considerable ongoing human/elephant conflict.



Map of Côte d'Ivoire

As its name implies, Côte d'Ivoire (or Ivory Coast in English) has a long historical association with Africa's trade in ivory. Before the international ban on ivory in 1989, the country had a flourishing ivory industry and was recognised as one of the most important carving centres in West Africa. In 1980, it was estimated that 16 large-scale ivory importers were supplying some 1,000 carvers in the country (Chardonnet *et coll.*, 1995). According to Customs statistics, Côte d'Ivoire's annual raw ivory imports from Central Africa peaked at over 57 tonnes in 1980 (Friedlein and Hykle, 1989). By the end of the 1980's, however, the local industry was in decline. In 1988, it was estimated that 3,750 kg of raw ivory was consumed annually by the local carving industry, a major decline over previous levels of consumption. A survey undertaken in 1994 identified no more than 55 ivory craftsmen and sellers in seven cities of the country (Dublin *et al.*, 1995), suggesting that the CITES trade ban was having a major impact on Côte d'Ivoire's ivory industry.

Martin and Stiles (2000) were the first to indicate a resurgence in the country's ivory industry. In their 1999 survey of Africa, Côte d'Ivoire, together with Nigeria and Senegal, harboured the most significant ivory markets in West Africa, and "Abidjan displayed the largest quantity of worked ivory" of all the 13 countries visited (Martin and Stiles, 2000). It was observed that the ivory industry in Côte d'Ivoire consumed less ivory than in 1989, but that more people were involved in the industry (Martin and Stiles, 2000). The present study was designed to provide another timely update on the status of the domestic ivory trade in Côte d'Ivoire.

### 2. METHODOLOGY

Field research was carried out in Côte d'Ivoire from 11<sup>th</sup>-20<sup>th</sup> June 2002. Interviews with relevant government authorities, representatives of non-governmental organisations and individual experts were held to assess legislation and policy pertaining to trade in elephant ivory and other elephant products in Côte d'Ivoire. Assistance in organising certain meetings was provided by the WWF West African Regional Programme Office (WWF-WARPO). Field research to assess the domestic ivory market was undertaken in Abidjan, neighbouring suburbs and the nearest beach resort, Grand Bassam, 80 km to the south. Considering time constraints, the decision was made to focus work upon Abidjan, the commercial capital of Côte d'Ivoire, and its immediate vicinity where most of the economic activity of the country has been concentrated since the political crisis of December 1999. Eleven individuals were interviewed:

- Vincent Beligné, Director of Côte d'Ivoire Nature;
- Bina Fofana, Head of Wildlife Unit, Directorate of Wildlife and Hunting Resources, Ministry of Water and Forests;
- Amani Denis Kouame, Director of Wildlife and Fisheries, Ministry of Water and Forests;
- Francis Lauginie, Director of Afrique Nature (formerly WWF Representative for West Africa);
- Dr Fanny N'Golo, Director of GEPRENAF;
- Souleymane Ouattara, Department of Zoology and Animal Biology, University of Abidjan
- Jean Michel Pavy, Ecologist, World Bank
- Aka Tano, Deputy Director of Wildlife and Fisheries, Ministry of Water and Forests;
- Sombo Tano, Director of National Parks, Ministry of Environment
- Wilfried Waitkuwait, Wildlife Biologist
- Souleymane Zeba, WWF Representative for West Africa

### 3. RESULTS

#### 3.1. Legislation and policy

##### *Legal framework*

Wildlife policy in Côte d'Ivoire is supported by a complex legal framework. The principal legal instrument is the *Wildlife Protection and Hunting Act No. 65-255* (4 August 1965), which classifies wildlife species of Côte d'Ivoire into four categories: totally protected species, partially protected species, predatory species and small game. This Act regulates hunting and capture of wildlife, wildlife trade, defence of human life and property, the use of firearms and penalties for infractions. Under this Act, the African Elephant was listed as a 'partially protected species' and, as such, only the adult elephants can be hunted by hunters holding a specific sport hunting licence and within the limit of a fixed quota.

The Act was followed by a series of implementation decrees and orders, in particular:

- *Decree No. 66-423* (15 September 1966), which sets conditions for the issuance of various types of hunting licence, and the related rights and obligations of the hunters in this regard. It also fixes the elephant hunting quotas for each type of licence and requires that hunters record the date and place of each hunt, and the weight and size of the each elephant tusk in an official hunting logbook.
- *Decree No. 66-425* (15 September 1966), which regulates circulation, import and export of hunting trophies and other wildlife products. Under the Decree, the possession or movement of trophies and other products must be accompanied by a certificate of origin, which supports their identification. In particular, elephant ivory tusks must be marked. All found ivory must be brought to the nearest governmental authority, and through subsequent auction, any derived revenue accrues to the State budget. For seized ivory and other wildlife products, the same procedure is followed. This law presumably allows a legal avenue for trade in the country.
- *Order No. 1712 AGRI/EFC* (29 December 1966), which specifies the conditions pertaining to the killing or the removal of problem animals, including elephants.

This legal framework was completely modified by *Order No. 003* (20 February 1974), which established a total ban on the hunting of wildlife in Côte d'Ivoire. Only the killing of problem animals, including elephants, if conducted by the proper governmental authorities, was authorized. All wildlife species, including the elephant, are now considered as 'totally protected' throughout the whole of the national territory. However, the provisions of the *Decree No. 66-425* on the circulation, import and export of elephant trophies and other wildlife products remained valid.

Twenty years after this ban on hunting, it was concluded that wildlife conservation had not been achieved. In fact, illegal hunting appeared to be increasing exponentially. With a view to tackling this situation, the hunting of wildlife was partially reintroduced for some species through *Act No. 94-442* (16 August 1994). This Act modifies *Act No. 65-255* of 1965 by the creation of new categories of hunting licences and various regulatory measures. It also creates new categories of species, which can

be hunted under specific conditions. The elephant remains in the category of ‘totally protected species’. However, for the Act to be valid, it stills requires the promulgation of an implementation decree. This issue is currently being considered by the related ministries, wildlife experts and donor agencies. In the meantime, the total ban on hunting of 1974 remains in effect.

Côte d’Ivoire joined CITES in 1994 through *Decree No. 94-448* (25 August 1994). In order to comply with CITES obligations in terms of wildlife trade in general, and the provisions of Conf. Resolution Conf. 10.10 (Rev.) in particular, a number of subsequent measures were taken by the government to regulate the domestic trade in elephant ivory.

*Decree No. 97-130* (7 March 1997) regulates the possession of ivory (Anon., 1997). It also controls the movement of ivory within and out of the country. The Decree stipulates that all pieces of ivory within the territory of Côte d’Ivoire must be declared to the Administration of Water and Forests for registration and marking as ivory of Côte d’Ivoire (*ivoire CI*) within two months from the date of publication of the Decree. These measures apply to ivory tusks (raw, carved or incorporated into another object), as well as pieces of worked ivory held by both private and public owners. According to Article 12 of the Decree, all domestic trade in ivory (raw and worked ivory) is forbidden in Côte d’Ivoire. However, any ivory trader that was legally and openly established prior to the publication of the Decree would be allowed to continue their businesses under two conditions. Firstly, they must declare their business to the Administration of Forests and Waters and, secondly, they must register their entire stock of ivory. Thus, the intention of the Decree was to allow only registered and marked ivory to be legally sold domestically, and only until such stock was sold out, at which point any further trade in ivory would cease. In all other cases, under the provisions of Articles 8 and 9 of the Decree, any change of ownership for any piece of registered ivory must be notified and recorded in the “*Registre des Ivoires*” (Ivory Register Book). Changing the status of a piece of ivory is subject to the prior and joint authorisation of the Ministry of Water and Forests and the Ministry of Culture. Under the same Decree, the import and export of ivory is strictly forbidden except with the exceptional authorisation of the Ministry of Water and Forests for registered ivory as ‘personal effects’. Finally the Decree provides for penalties for infractions relating to its provisions.

### ***Implementation and enforcement***

The implementation and enforcement of wildlife legislation in Côte d’Ivoire is the responsibility of both the Directorate of Wildlife and Hunting Resources (*Direction de la Faune et des Ressources cynégétiques*<sup>1</sup>), under the Ministry of Water and Forests, and the Directorate for the Protection of Nature (*Direction de la Protection de la Nature*), under the Ministry of Environment. The Directorate for the Protection of Nature is in charge of wildlife management within national parks, while the Directorate of Wildlife and Hunting Resources is in charge of wildlife throughout the rest of the national territory. Implementation and enforcement of national legislation on trade in elephant ivory and other wildlife products falls to the Ministry of Water and Forests, and its agents at entry points and other stations throughout the country, with the assistance of the Police and Customs. The CITES Management Authority is in the hands of the Directorate of Wildlife and Hunting Resources.

Historically, enforcement of wildlife legislation has been poor in Côte d’Ivoire. Implementation of the most recent legislation and other measures taken to regulate trade in ivory and other elephant products follows the same general pattern. The Directorate of Wildlife and Hunting Resources, acting as the CITES Management Authority, acknowledges deficiencies in the system and admits that laws, particularly *Decree No. 97-130*, are not enforced strictly. Several reasons are cited for this state of affairs, including:

- **Insufficient financial, equipment and human resources:** An attempt to register and mark the country’s ivory stocks pursuant to *Decree No. 97-130* was not completed because the European Union (EU) funding was reported to be insufficient. The registration process was to be followed by the creation of a special unit to monitor the movement and domestic trade in ivory, but this body was never created because of a lack of funding. Officials at the Directorate of Wildlife and Hunting Resources confided that domestic trade in Côte d’Ivoire is not well regulated and recognise that most of the ivory being sold on the market is coming

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<sup>1</sup> At the time of this survey, this Directorate was known as *Direction de la Faune et de la Pêche en Eau continentale*, but subsequently changed its name to that now indicated in the text of this report.

from illicit sources. However, they point to insufficient manpower as the major problem inhibiting efforts to control the retail trade in ivory. The annual budget of this Directorate was reported to be only CFA2.5 million (USD4,100)<sup>2</sup>, which is just enough to pay staff salaries. This budget does not allow for effective implementation of the country's wildlife policy, or even to provide the basic equipment needs of local agents. On the ground, equipment, such as computers and basic vehicles in good working order, is seriously lacking, making effective control operations very difficult.

- Political and social constraints: Ivory carving in Côte d'Ivoire was in the past a big industry and still employs a considerable number of people in the country. Although the domestic trade in ivory is legally forbidden in Côte d'Ivoire, according to government wildlife officials, it would be extremely difficult politically to request that traders and craftsmen stop their businesses overnight. Accompanying measures would need to be put in place for traders and craftsmen to revert to other activities.
- Lack of collaboration between the law enforcement bodies: The Ministry of Water and Forests units responsible for CITES controls at the airport and ports (*Brigade Forestière de l'Aéroport et du Port Maritime*) have enormous difficulties in fulfilling their duties and ensuring effective controls as Customs and the Police generally refuse any collaboration. The current state of affairs is one where Customs and Police do not communicate information on seizures of illegal wildlife products to the wildlife authorities, nor do they transmit any seized products to the Water and Forest agents.
- Lack of access to ports of entry and exit: The Water and Forests agents at the airport only have sporadic, and not permanent, access to luggage at the arrival and departure halls, and to the freight terminals. The situation has actually worsened over the last few years since Abidjan airport is now managed by a company known as Aeria. In a report to the Directorate of Wildlife and Hunting Resources, the airport unit complained that "it had to suspend its control of luggage at the arrival hall in February 2001 following serious clashes with the Customs." At the departure point, they are refused access to the scanner to investigate potentially suspect luggage.

These issues were outlined in an internal report in February 2002 by Water and Forest agents stationed at the airport:

*Customs authorities refuse any kind of collaboration. All the pieces of luggage containing ivory are systematically diverted by an active network composed, among others, of the Customs, the Police and Air Afrique staff. When ivory is found during a control of the Water and Forest agents, it is seized by the Customs under the argument that it is their prior responsibility and the ivory is returned to the owner (Anon., 2002a).*

Unfortunately, what is happening at the airport is an illustration of what is said to happen elsewhere in the country, at the port and on the roads, where the Waters and Forest agents would be equally impeded in their activities by the systematic obstruction of Customs and the Police.

In addition to the issues cited by the Directorate of Wildlife and Hunting Resources, information collected through interviews and other research suggest other constraints as well. The current political situation in the country is extremely unfavourable to good law enforcement. Corruption has reached unprecedented levels, according to local press accounts, and CFA600 billion (approx. USD100 million) is lost each year by the State because of corrupt practices (Anon., 2002b). Corruption probably plays a significant role in the lack of political will to establish effective law enforcement for the country's ivory trade.

Most officials also complained of heavy administrative burdens, leading to considerable frustration on the part of agents charged with implementation and enforcement of legislation at the ground level. Moreover, such agents are often not supported by their direct superiors. In the annual report for 2001

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<sup>2</sup> Exchange rate used here and throughout the text for Côte d'Ivoire and Senegal: CFA610 = USD1.00 rounded off to the nearest dollar. CFA = Communauté Financière Africaine; USD = United States Dollar.

to the Directorate of Wildlife and Hunting Resources, the Water and Forests Unit at the airport not only requested financial assistance and basic equipment, but also the intervention of their administration to try to find a solution to their ongoing conflicts with Customs and other airport staff. Prevented from operating effectively, the report mentions the many frustrations of the agents who are consequently tempted to quit their job (Anon., 2002a). The Wildlife Director, who gave a copy of this report to the principal researcher, said he did not have the means to satisfy their demands.

### *Ivory stockpiles*

Following the publication of *Decree No. 97-130* (7 March 1997), the Directorate of Wildlife and Hunting Resources initiated a national programme to register and mark all ivory held within the boundaries of Côte d'Ivoire. The project was financed by the EU and the expected outputs of this effort were:

- a better knowledge of ivory craftsmen and private holders;
- a better appraisal of the volume of ivory stocks within the country;
- the establishment of a monitoring strategy for these stocks; and,
- the implementation of the resolutions concerning ivory from the 10<sup>th</sup> meeting of the Conference of the Parties to CITES.

The project started on 9 February 1998 and finished on 31 December 1998. In terms of results, the following was communicated to the EU Delegation:

- 224 ivory owners had been registered in the country, including four public bodies, 174 private owners and 46 traders.
- 3,664 pieces of ivory were recorded with a total weight of 7,110.7 kg; 65 pieces belonging to public entities (450.3 kg), 2,181 to private individuals (5,064.2 kg) and 1,418 to traders (1,596.2 kg).

However, according to some sources, the project was flawed in that it was not comprehensive enough. In particular, very few retail outlets and workshops apparently were visited. For instance, it was alleged that the Koumassi complex, an important outlet for ivory, was not part of the registration and marking operation. In fact, the government itself, in its letter to the EU after the end of the project, mentioned “the existence of an important stock of ivory still in the hands of some holders”. The government requested a second phase for the project “to better assess the real ivory stocks being held in the country”, but the EU is at present not prepared to fund it.

According to the CITES Management Authority, apart from the incomplete EU-funded ivory registration exercise, it is not known how much ivory is currently held in the country, even those stocks which are ostensibly in the hands of State authorities. Although flawed in terms of its implementation, *Decree No. 97-130* actually represents the first serious attempt to manage ivory stocks in Côte d'Ivoire, but certain gaps are apparent. For example, there is no official provision for the management and storage of State-held ivory stocks. Moreover, substantial amounts of ivory reportedly still remain in the hands of private owners, including retail dealers, which have never been officially identified and recorded.

### *Participation in ETIS*

ETIS was discussed during several official meetings with three representatives of the CITES Management Authority. On one occasion, a copy of the ETIS Country Report No. 2 and the accompanying letter from TRAFFIC requesting data on elephant product seizures was presented to the Director of Wildlife. From what can be concluded from these meetings, local CITES Management Authorities are not particularly concerned about national compliance with ETIS.

While it was acknowledged that the ETIS data collection form had been received, none had yet been filled out and submitted for various reasons. It was indicated that there was insufficient data on elephant product seizures in the country because Customs officials throughout the country, and especially at the airport, were not routinely communicating any such data to agents of the Directorate of Wildlife and Hunting Resources. At a later date, however, it was noted that in an annual report from the Directorate's airport unit, at least one ivory product seizure was recorded. Another reason given for



failure to participate in ETIS was that to collect information in a systematic manner throughout the country, it was necessary to contact the ten Regional Directorates, which in turn would need to liaise with 54 sub-units. This had not been initiated because of insufficient time and staff capacity. It was noted that filling in the form would be “extremely time consuming” and most of the staff do not have the technical capacity to fill in the form. Many forms come back to the CITES Management Authority with very incomplete data, and it took considerable time to complete the information by phone and fax, when the lines are functioning properly. And finally, there were insufficient financial means to implement ETIS.

Subsequent to these meetings, Côte d’Ivoire made its first submission to ETIS and tabled data on six ivory seizure cases which had occurred in 2002.

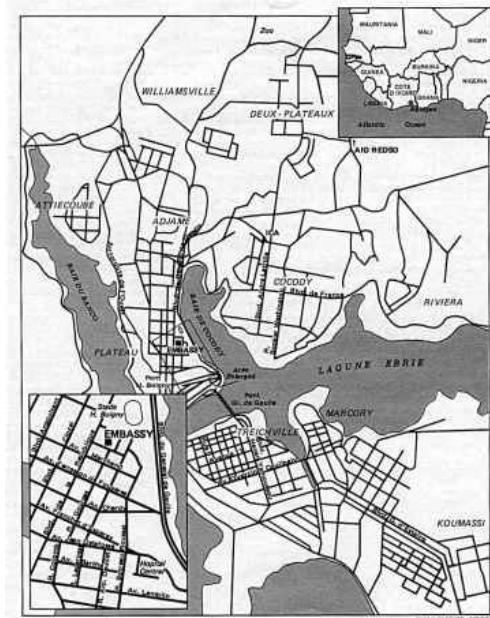
### 3.2. Retails outlets and prices for worked ivory in Côte d’Ivoire

All the locations mentioned in the Martin and Stiles (2000) report as selling ivory were revisited to the extent possible. During the current survey, additional places with ivory products were also identified. In Abidjan, ivory was found in the Koumassi shops/workshops complex, at the Cocody Market, at the Craft Centre in Zone 4, in the workshops in Treichville, and in a few places at the Plateau market in the centre of town. Ivory was also seen in some shops in the Plateau, in a shopping centre in Zone 4, in the duty free section of the Felix Houphouet Boigny Airport and in almost all the big hotels of Abidjan. Finally, Grand Bassam, the nearest beach resort to Abidjan, was visited and ivory was found there as well (see **Table 1**).

#### *Abidjan markets*

In **Koumassi**, a district in Abidjan, ten shops were found selling ivory just opposite the *Commissariat du 6ème arrondissement*. Four shops had direct access to a common courtyard, which was apparently used as a workshop, while another five had their own small workshops behind the front room as well as access to the rear courtyard. The Koumassi complex, featuring both shops and workshops, offered the largest selection of worked ivory products found during the survey, and probably within the entire country. Considering the large quantities of ivory on display, the area was visited twice by two researchers working together, who observed the following:

- Only one shop featured ivory exclusively and did not also sell wood carvings as was the case for all other shops. It had the largest volume of ivory, probably more than 2,000 items for an estimated **280 kg** of worked ivory. The shop had no access to the back courtyard. Many big pieces were exhibited in glass cases around the room. The great variety of items were obviously designed to appeal to all kind of buyers. Statues of geisha and Buddha and name seals for Asiatic clients were observed. At the time of the visit, two clients, probably Chinese or Korean, were buying two 40 cm high carved tusks for USD100. Certain items were particularly noteworthy as they represented a specific style of carving, different to the rest of the worked ivory on display. The owner of the shop, a Congolese, who was assisted by one vendor, explained that he was importing some pieces from the Democratic Republic of the Congo, while the majority of the stock was carved on the premises. According to the owner, business was not good. He had opened his shop 37 years ago and, in the past, his shop was full of buyers, he said.
- Another shop was selling a pair of large uncarved tusks, which measured 2 metres in height. According to one of the two vendors, they weighed 107 kg and had come from the Democratic Republic of the Congo. Diplomats usually purchased such tusks, it was explained. The pair in question cost CFA10 million (USD16,392). The rest of the ivory, weighing about 30 kg in



Map of Abidjan

Courtesy of The General Libraries, The University of Texas at Austin

## More Ivory than Elephants: domestic ivory markets in three West African countries

total, included four 50 cm high carved tusks (about 2 kg each), one 400 g Buddha, two 500 g elephants, two bundles of 20 chopsticks, 16 square and round name seals, ten antique Greek-style statues (about 300 g each) and a number of smaller items. In all, the shop had an estimated **137 kg** of ivory on display.

- Four other very large raw tusks (1.8-2 m high) were seen in another shop, weighing about 200 kg together. The price for a pair was CFA15 million (USD24,588). One pair had apparently been cut into two pieces, and then screwed together. One of the two retailers explained that this had been done to facilitate transport by plane. A long wooden packing crate was lying on the floor at the back of the shop, apparently ready to hold one or two of these big tusks, according to the vendor. Again, Asian diplomats were identified as the usual buyers of such tusks. The shop was also carrying another 15 kg of ivory, including ten medium-sized tips, five pieces of old ivory and some smaller items, but most of the items on sale in the shop were wood carvings. The total volume of ivory in the shop was estimated at **215 kg**.
- One shop was noticeably different in that it was not exhibiting a single large item of ivory, but rather only featured mostly flat pieces, 10 cm high statuettes and various small items, but in large quantities, about **50 kg** in total. A few elephant hair bracelets were also on sale.
- Another shop had an estimated **40 kg** of worked ivory products, including one large sculptured head weighing about 4 kg, 40 ivory tips, 30 other large pieces and smaller items.
- The shop next door was carrying about **35 kg** of ivory, one very large carved piece of some 4 kg, 50 medium-sized tips and at least 4 kg of name seals.
- Another shop, which displayed mostly wood products, also had some 40 ivory items, weighing about **12 kg** in all. The larger pieces featured a special style of carving and the prices were marked. The shop had no access to the back. The vendor, an Ivorian woman who was probably the owner, explained that the worked ivory on display in her shop was not carved on her premises, but came from somewhere else in town, but she did not specify the location.
- Finally, the last two shops were hardly visited as a point had been reached where it was judged very hazardous to go on entering the shops asking numerous questions without buying. Most of the shops were communicating with each other by the back and vendors seen in one shop were reappearing in the others. At a glance, the two shops were not carrying more than **30 kg**.

In summary, the total amount of ivory observed in the Koumassi block was estimated to total approximately **799 kg**.

During visits to the Koumassi shopping complex on two separate occasions, only three prospective buyers were seen, one French woman who did not buy anything, and two Asian men (most probably Chinese or Korean). None of the vendors seemed to worry about the illegal nature of their businesses. One vendor said he could not recall any attempt at control of his business by the authorities, and most claimed it was easy to move ivory through Customs control at the airport.

The **Cocody Market**, on the Boulevard de France, is the largest African arts and crafts market in Abidjan. Food, textiles, and many other consumer products are also found at this market. The following was observed during the course of this survey:

- Inside the market building, ten shops were found selling ivory on the ground floor, six with very few items (mostly necklaces and small items) for a total of **3 kg**, another three displayed between 5 and 8 kg of ivory each, totalling **21 kg**, and one shop was selling around 150 medium to small-sized ivory items, weighing an estimated **10 kg**.
- Much more ivory was found on the first floor. Among the nine shops carrying ivory, three shops displayed large quantities, respectively about **150 kg**, **120 kg** and **72 kg**. Apart from a few other items fashioned from malachite and ebony, these shops featured ivory exclusively. The exhibited items included many large pieces, including entire rows of carved tusks of 3-4 kg at CFA350,000 (USD574) each, and 1.5-2 kg at CFA180,000 (USD295) each, ten large



heads and busts of 3-4 kg, and one 90 cm high walking stick, weighing about 4 kg. There were also many medium-sized pieces of about 200-300 g, and various small items such as carved ivory fruits, animals, small busts, Buddhas, name seals and chopsticks, entire rows of bracelets, necklaces, and other accessories. It was possible to order special pieces upon request.

- Two other stalls were found to display smaller, but still substantial, amounts of ivory. One had an estimated **37 kg** of worked ivory products, including a few 20-25 cm high carved tusks and statues, along with a large quantity of smaller items. The second one exhibited an estimated **28 kg** of ivory, including six raw tusks that were 40-50 cm in length.
- Finally, four shops on the same floor were carrying small quantities of ivory, mainly bracelets, necklaces, small animal, chopsticks, rings and earrings, amounting to an estimated total of **14 kg**.
- Among the stalls outside the market building, seven stalls were found to carry ivory, in addition to various other craft items. Three stalls had relatively large amounts, and virtually the same style of carving. One was displaying ten 20-25 cm carved tusks weighing about 15 kg in total, an estimated 22 kg of large bracelets displayed in six large rows, a few animals, statues and smaller items for a total estimated weight of **60 kg**. Another stall had 17 carved tusks and statues on a shelf, about 18 kg of bracelets, and other items for an estimated **46 kg** of ivory in total. A third one had an estimated **40 kg** of ivory pieces among which 12 carved tusks. Finally, four other stalls were carrying very few items, for an estimated **3 kg** in total.

In total, **604 kg** of worked ivory products were observed in Cocody Market. Most of the ivory vendors in this market were the owners of their shop. There was generally only one vendor per shop, except for four of the bigger ivory shops that employed two people, each time members of the same family. On the upper floor of the market, the vendors of two of the shops were brothers from Mali, while another shop was owned by the their father. The rest of the vendors at the market were from Côte d'Ivoire, Senegal, Nigeria, Guinea and Burkina Faso.

The market was visited three times and, on each occasion, not a single tourist or foreign resident was seen in the ivory shops. The market as a whole was practically empty when visited during the week and no more than ten non-African foreign people were seen wandering around the alleys during the weekend. All the ivory vendors complained about a drop in their business since the political crisis of December 1999, which prompted a drastic contraction of the tourist industry in the country. The present survey took place during the rainy season, the low tourist season, thus obviously not the right time of the year for business. According to some of the vendors, the main buyers were American, French, Chinese and Japanese, in order of importance. When the consultant, acting as a potential buyer, expressed concern about control at the airports, one of the vendors said they could take care of any difficulties. In this regard, they would specially pack substantial pieces of ivory, usually covering them with clay so that they would not be detected during transport.

The **Abidjan craft centre** (*Centre artisanal de la Ville d'Abidjan*), situated in Zone 4 of the city, was also visited. It was completely devoid of clients and again the researcher was the only potential buyer in the entire centre during the investigation. The following was observed:

- Seven stalls were found selling a few ivory items among the usual African crafts. Five had very few items, only some necklaces and small items. These stalls were probably carrying no more than 4 kg in total. One retailer had only two pieces of ivory: two 60 cm high raw polished tusks that he said came from Democratic Republic of the Congo. The pair was priced at CFA300,000 (USD492) and weighed about 2 kg. Another boutique had more items on display, which the other stall vendors designated as the 'main ivory stall'. It was owned by two Senegalese, who revealed many more pieces from a trunk when the consultant pretended she wanted to buy their whole stock for friends currently visiting Côte d'Ivoire. The two vendors explained business was not good and they were hiding their ivory items as, they said it was forbidden to sell it to tourists. In total, they showed 35 items weighing an estimated 5.5 kg. Among these pieces were one 70 cm long tusk very nicely carved costing CFA350,000 (USD574), 12 100 g necklaces at CFA12,000 (USD20) each, 14 2 cm large bracelets at CFA22,000 (USD36) each, one 20 cm high statue at CFA60,000 (USD98), two small

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elephants of 250 g at CFA75,000 (USD123) each, another four animals at CFA50,000-60,000 (USD82-123) and one thin antelope at CFA25,000 (USD41). The total quantity of ivory on display in the whole market could be estimated at **10.5 kg**, but probably more remained hidden.

In the **Plateau Market** no more than an estimated **1.5 kg** of ivory was on sale in five stalls. Very few ivory items were displayed: only four combs and two 25 cm high statues were seen. The vendors pretended it was horn and explained to the researchers that ivory was forbidden. When the researchers started to show interest in buying ivory, several other items were taken out from under the tables and from pockets.

Two workshops in **Treichville** were found to be selling ivory. One had a front shop carrying an estimated **15 kg**, represented by some 450 pieces of ivory. Among the displayed items were: six 35-40 cm high carved tusks at CFA300,000-400,000 (USD492-656) each, one finely carved tusk, 80 cm long, costing CFA400,000-500,000 (USD656-820), one pair of raw polished tusk (35-40 cm high) at CFA160,000-200,000 (USD263-328), a series of 2 cm large bracelets at CFA15,000-20,000 (USD25-33), and a few necklaces and 5 cm high statues. One of the two Guinean owners of the shop/workshop said that business was not good these days, but a few tourists came to buy from time to time, as well as U.S. military personnel. The second workshop had almost no ivory in its front showroom, except five small items estimated at **150 g** in total. These apparently had been on display for quite a while.

### *Abidjan hotels*

The **Tiama** is a five-star hotel on the Boulevard de la République in the Plateau. The only shop in the hotel featured ivory, among various other African craft items. Altogether, an estimated **27 kg** of ivory was displayed in the shop itself and in a glass display case in the hotel entrance. Approximately 450 items, both large and small-sized pieces, were counted, including a pair of 50 cm high carved tusks at CFA650,000 (USD1,066), eight 25-40 cm high statues at CFA230,000-450,000 (USD377-738), three large heads weighing 1-1.5 kg each and costing between CFA395,000-550,000 (USD648-902). One head had a partially scratched-out mark - 'CI 98' - at the base, probably indicating that it had been carved from a registered piece of ivory. All the items displayed had marked prices (see details on these prices in **Table 3** below). The vendor explained the shop owner was a French woman, an expatriate resident in Abidjan, who had started her business three years ago. It was reported that this shop had never been subjected to any control from the authorities and had never been required to get any licence. The shop was supplied with ivory once a month on average, from only a single supplier in Côte d'Ivoire. The main buyers were mostly Americans and Europeans, but also included local businessmen. According to the vendor, business for ivory was rather good, but prices had gone up recently.

The shop in the **Ibis Plateau** hotel had **1.15 kg** of ivory in its shop: five 2-3 cm bracelets, weighing around 80 g each, three necklaces of 300 g each, ten small figurines that were 8 cm high and about 25 g each, ten earrings and 37 rings. Bracelets and necklaces were CFA20,000 (USD33) each, the small figurines CFA10,000 (USD16) and the earrings were CFA10,000 (USD16) for a pair, and rings were ranging from CFA10,000-15,000 (USD16-25) each. The vendor, an Ivorian woman, said ivory products were received about every two months from the owner of the shop, who was also an Ivorian. This ivory apparently came from a workshop in Grand Bassam. The vendor claimed that she was currently at the end of her stock and usually had many more items. She further mentioned that ivory sales were good, and that clients included both tourists and local Africans.

The **Ibis Marcory** hotel, near the airport, had ten 10 cm high items in a glass shelf in the entrance amounting to **0.5 kg** in total.

The **Novotel** hotel had an estimated **4 kg** of ivory displayed in a glass shell in the lobby, including 57 medium to small-sized items between 50-100 g each, various small figurines, small fruits and other objects, and 70 very small rings, earrings and other accessories.

The **Sofitel** hotel was the only hotel where no ivory was found.

At the **Hotel Ivoire**, a total of 32 ivory items weighing about **1.4 kg** were seen in the upper level shop Rose Ivoire in the lobby, including one large hollow tusk lamp, three thin 25 cm statues, three 5-10 cm high heads, ten small pieces of around 7 g each and 15 very small pieces of jewellery, mostly earrings.

The **Hotel Forum Golf** is a five-star hotel, where two shops in the lobby were found to carry ivory. A jewellery shop, Bijouterie la Perle du Golf, displayed 21 pieces, including five necklaces and 16 rings for a total amount of about **0.5 kg**, while the African art shop, Mémoire d’Afrique, had an estimated **6 kg** of ivory on sale, including two very large busts of 2.5-3 kg costing CFA250,000 (USD410) each and one 8 cm high statue at CFA50,000 (USD82). The owner of the shop, an Ivorian woman assisted by two vendors, said that she usually had many more ivory items in her shop, that business was good and that many tourists were buying ivory as well as African businessmen. She explained she was getting her stock at the Cocody Market and could order special pieces to be made upon request.

### *Abidjan other shops*

The **Art et Tentation** is quite a luxurious shop selling African art, gifts and jewellery in Galerie Sud, a large shopping centre situated in Zone 4. It also displayed 112 ivory items of various style and dimension, weighing an estimated **22 kg** in total. However, the vendor explained that many more pieces were in storage and not on display in the shop. Among the offerings were two carved sticks of 2 m high of around 4 kg at CFA1,250,000 (USD2,049) each, a 20 cm long car of about 400 g at CFA85,000 (USD139). One big bust of at least 4 kg and costing CFA750,000 (USD1,230) had markings at its base - ‘CI 98 55’ - indicating that it probably originated from the registered stock of ivory in Côte d’Ivoire in 1998. The last figure, 55, possibly means that the piece had been carved from a tusk weighing 5.5 kg. In fact, one of the two vendors of the shop explained that the police had come some time ago to mark the stock. The owner was reportedly an Ivorian woman who owns a private stock of raw ivory that she was selling off. The vendor explained that recently several large raw tusks had been sold to carvers because of the current scarcity of ivory on the local market. Most of the worked ivory in the shop came from the owner’s private stock, which reportedly involved sending raw ivory to Cameroon where it was carved, then importing the worked ivory products back to Côte d’Ivoire. Business was good and French tourists and expatriates were identified as the main buyers. The vendors were aware of international regulations, but according to them: “CITES was soon going to allow international trade in ivory for some West African countries because elephants were causing increasing problems for farmers”.

The **Galerie MOB** is an African art shop situated on the Boulevard de la République in the Plateau. It was found to display only a single ivory bracelet of about **100 g**, priced at CFA25,000 (USD41).

The **Galerie Akagni**, another African art shop located on the Rue du Commerce near the Sofitel, was carrying 20 pieces of ivory, with an estimated total weight of **2 kg**, all of which appeared to be antiques.

Two shops in the duty free section of the Abidjan international airport were exhibiting a total of **1.2 kg** of ivory. One shop was displaying 15 ivory and ebony paper knives weighing about 300 g. The second shop was selling 82 small pieces, including one thin antelope, three 2 cm large bracelets, and many broaches, rings and earrings for an estimated 900 g in total.

### *Grand Bassam*

Grand Bassam is a beach resort 40 km south of Abidjan, the nearest beach frequented by tourists and expatriates. No ivory was found in the hotels along the 1 km long beach front. The following was observed in other locations:

- Ivory was found in the **Artisanal Centre of Grand Bassam (Centre artisanal de Grand Bassam)**, France quarter (Quartier France), in the centre of the resort. The Artisanal Centre consists of a big hall with different craft stalls selling all kind of African curios for tourists: wood carvings, jewellery, linen, textiles and other products. Only one stall was selling ivory, where an estimated **22 kg** was displayed in a five-level glass display case, including four 40 cm high carved tusks at CFA160,000 (USD262) for a pair, approximately 25 carvings of 300-400 g each, 50-70 bracelets and necklaces, and many small items. Most of the vendors in the cooperative were Ivorian. The researcher was the only visitor during the whole duration of the

visit, but was told that usually many tourists come during the dry season. The vendor refused to identify the owner of the stall and did not know the origin of the ivory, but indicated that the workshop that supplied the ivory was situated in Grand Bassam in the African part of the town. When the consultant asked to see ivory being carved, the vendor replied it was not possible.

- More ivory was found in the **Village Artisanal de Grand Bassam**, located just off Grand Bassam, consisting of about 40-50 African curio and small furniture shops and stalls, lined on each side of the road from Abidjan to Assinie. One shop was found to be displaying a fair volume of ivory items, weighing an estimated **34 kg** in total. Among the articles displayed were two pairs of small raw tusks of approximately 25 cm high at CFA90-120,000/pair (USD148-197/pair), two pairs of 35 cm high carved tusks, 18 20-25 cm high carved tusks, and approximately 200 medium-sized items (18-20 cm high statues, animals, etc.), roughly 40 large bracelets at CFA4,000-5,000 (USD7-8) each, and a large quantity of smaller items. One of the two vendors, a Nigerian, who was the owner of the shop, said it was easy to get past Customs at the airport. He said that a French couple had recently bought a pair of large raw tusks and that most buyers were tourists. He further said that he did not know where the ivory was coming from, but he was supplied by a workshop in Treichville, a quarter of Abidjan. The other items in the shop were ebony and wood and stone carving, cloth, and other curios.
- Another four outlets in the Village were identified as selling small amounts of ivory, between 200 g and 1 kg (paper knives, necklaces, boxes, etc.) each, totalling approximately **1.8 kg**.

Table 1

Summary of surveyed retail outlets in the region of Abidjan, Côte d'Ivoire, June 2002

Outlet location	Number of outlets	Total estimated weight (kg)	Estimated number of vendors*
Koumassi complex	10	799.00	20
Cocody market	26	604.00	30
Abidjan craft centre	7	10.50	8
Plateau Market	5	1.50	5
Treichvile workshops	2	15.15	3
Tiama Hotel shop	1	27.00	2
Hotel Ibis Plateau	1	1.15	2
Hotel Ibis Marcory	1	0.50	1
Novotel	1	4.00	2
Hotel Ivoire	1	1.40	3
Forum Golf Hotel	2	6.50	4
Art et Tentation – Zone 4	1	22.00	3
Galerie MOB	1	0.10	1
Galerie Akagni	1	2.00	1
Abidjan airport	2	1.20	3
Grand Bassam Craft Centre	1	22.00	2
Grand Bassam Craft Village	5	35.80	7
<b>Total</b>	<b>68</b>	<b>1,553.80</b>	<b>97</b>

\* The estimated number of vendors also includes the owner, as in some cases it is the same person.

**Retail prices in Abidjan**

The two tables below are an indication of retail prices for ivory items as prevailing in Abidjan at the time of this survey. Cheaper prices are found for ivory items displayed for sale in the craft centres, workshop show rooms and in the markets (see **Table 2**), while much higher prices for the same ivory products are found at the more luxurious hotels (see **Table 3**).

Table 2

Range of average retail prices of ivory items in Abidjan, Côte d'Ivoire, June 2002

Items	Description	Average prices (in CFA)
Raw polished tusk	1.80-2 m high, 45-51 kg	5-7 million
	60 cm high, 1-1.2 kg	120,000-150,000
	35-40 cm high, 600-800 g	80,000-100,000
	20-25 cm high, 400-500 g	45,000-60,000
Carved tusk	70-80 cm long, finely carved	350,000-500,000
	40-60 cm high, 1-2 kg	100,000-180,000
	25-35 cm high, 600-800 g	80,000-160,000
Bust/head	35 cm high, 3-4 kg	450,000
	5-10 cm high	30,000
Statues	40 cm high, 350 g	60,000-85,000
	20 cm high	60,000
Walking stick	1.5 m high, 2-3 kg	800,000-1 million
Animal	350 g	65,000-80,000
	200 g	45,000-60,000
	120 g	50,000
Antelope head	thin, 80 g	25,000
Lobster	30-40 cm large, 400 g	80,000
Bunch of chopsticks	12 pieces	10,000
Bracelets	3 cm, large	30,000-45,000
	2 cm, large	15,000-20,000
	thin	5,000
Necklace	200 g	30,000
	100 g	12,000
Ring	2.5 g	3,000-5,000

The prices given in these tables are averages of the prices obtained in different locations after bargaining whenever possible. The table does not include the fixed prices of items found in hotels and luxury shops, but only those seen in markets, craft centres or workshops. It must be noted that prices vary not only according to the weight of a piece, but also depending upon the quality of the carving. The price of a similar piece in the same location can also differ greatly from one vendor to the other, and whether or not the client is a tourist or a trader. Therefore, the prices presented in this report should be considered as indicative and treated with some caution.

Table 3

Retail prices of ivory items in Tiama Hotel, Abidjan, Côte d'Ivoire, June 2002

Items	Description	Average prices (in CFA)
Carved tusk	50-60 cm high	300,000-325,000
	25-30 cm high	200,000
Bust/head	35 cm high, about 1 kg	395,000-430,000
	5-10 cm high	22,000-38,000
Statues	large, 40 cm high	450,000
	medium, 25 cm high	230,000
	small, 10 cm high	37,000-75,000
Animal	large, 450 g	500,000-690,000
	medium, 350 g	200,000
	small, 250 g	45,000-65,000
Lobster	30-40 cm large, 400 g	200,000
Buddha	300-350 g	120,000
Comb	10-15 cm long	36,000-75,000
Paper knife	15-20 cm long	25,000
Bracelets	2 cm, large	50,000
	1 cm, large	22,000
Bunch of small fruits	12 pieces x 15-20 g	80,000
Ring and earring	2-5 g	8,500-15,000

### 3.3. Ivory carving and manufacturing in Côte d'Ivoire

#### *Abidjan workshops*

During the survey, a total of eight workshops were visited in two areas of Abidjan, Koumassi and Treichville (see **Table 4**). It was not possible to locate two other workshops in the Abobo quarter, north of Adjamé, as reported in Martin and Stiles (2000). Although several ivory retailers were questioned about these workshops, as well as the wildlife authorities themselves indirectly, all reported that there were no ivory workshops in this area of Abidjan. Information on other workshops located in Abidjan and in the rest of the country were obtained from informants in retail outlets and through interviews.

In the past, Abidjan was regarded as the most important carving centre for ivory in Côte d'Ivoire (Martin and Stiles, 2000). It would appear that this distinction has not changed, and that the **Koumassi complex** is the biggest carving centre within the Abidjan region. According to the vendors, Koumassi workshops supply not only the large hotels in Abidjan and the Cocody Market, but also Senegalese traders who buy ivory for export to Dakar. The owner of the largest shop surveyed, an individual from the Democratic Republic of the Congo, claimed that most of the carvers of Koumassi were working for him. He also explained he was organising the import and selling raw ivory wholesale to the other Koumassi workshops. He indicated that most of the raw ivory he dealt with came from the Democratic Republic of the Congo, but also some was obtained from Cameroon, Gabon and, to a lesser extent, from Central African Republic. Referring to the Democratic Republic of the Congo, he also added he saw no harm in killing elephants in a country where so many people were being killed.



Five of the shops in the Koumassi complex were found to have small workshops in their back rooms. In one of these workshops, a carver was seen carving a 12 cm high ivory bust, while two others were carving wood. The owner/vendor, who was also a carver, told the researchers that this particular workshop employed three craftsmen, two from Côte d'Ivoire and one from Liberia. In the other four small workshops, no more than three or four craftsmen were working and they were all seen carving wood during the investigation. During the two visits, no more than three craftsmen were working in the common courtyard workshop behind the shops and they were also carving wood. It is difficult to say how many carvers are actually working in the six Koumassi workshops. While most of them are currently only working with ivory on a part-time basis, a total of 50 carvers would seem to be a fair estimate. The majority of them, probably 80%, were said to be from Guinea, the rest were Ivorians and Liberians. In all the Koumassi shops and workshops visited, not a single pile or bag of raw tusks or ivory sections was seen.

Two workshops are located in **Treichville**, another quarter of Abidjan, on Avenue 9, behind the Senegalese Mosque. One workshop employed 25 craftsmen, all Guinean, according to the two owners, also from Guinea. Six carvers were observed working at the time of the visit: four were carving ebony and two were making large ivory bracelets. The researcher was shown several 3 cm large hollow sections of raw ivory from which the bracelets were being carved. The raw ivory was said to be supplied from Central Africa, especially from Cameroon, but the owners complained it was more and more difficult to get stocks of raw ivory and that prices had soared recently since Air Afrique had ceased operations some six months ago. Special pieces of worked ivory could be ordered, and the workshop claimed to supply various retailers in the Cocody market and in the Plateau. The second workshop employed seven craftsmen, according to the owner, and was the first ivory workshop to be established in Treichville. As business was not currently good, he said, he no longer worked with ivory, but rather carved ebony. However, he claimed he could get ivory at any time and that certain pieces could be made quickly. He also reported that his supply of raw ivory usually came from Cameroon.

#### *Grand Bassam workshops*

As mentioned previously, one workshop is allegedly situated in the centre of Grand Bassam, according to a vendor in a shop within the Centre artisanal de Grand Bassam in the Quartier France. Unfortunately, this vendor, an Ivorian woman, refused to show the consultant the workshop and it was not possible to obtain the number of carvers working there. It was reported, however, that the carvers at this location were currently carving wood, as there had not been any supply of ivory recently.

It was noted during the survey that, most of the time, shops and markets have several different suppliers of worked ivory. One of the vendors at the Cocody Market said he was supplied by a workshop in Bouake and was buying the rest of his stock in Koumassi. Another vendor at one of the Malian-owned shops, told the investigator he was buying carved pieces in Treichville and Koumassi, but was also importing carved pieces from Central Africa. The rest of his stock was carved by his own father at their small family workshop in the Cocody quarter, which employed four, and sometimes five, carvers. It was explained that it was not possible to visit the workshop as it was located at their home.

The stall at the Centre artisanal with the two Senegalese vendors was also linked to a family workshop. The two carvers supplying the shop, and most probably the other stalls, were their own fathers, but one had just reportedly retired. These individuals were also working from home, which probably contained a stock of ivory, as the researcher was told that large quantities of ivory were available if interested. The two Senegalese retailers complained that the ivory business was currently not good, because very few people were buying and because of the increasing scarcity of the raw ivory supply, which in their case came mostly from the Democratic Republic of the Congo. There, good quality tusks of 1-1.5 m in height could still be found. In contrast, ivory tusks from within Côte d'Ivoire were reportedly too small and, thus, not interesting. They also reported that their supply of raw ivory was transported by plane from Central Africa, and that they did not experience any great difficulty at the Abidjan airport thanks to the complicity of Customs.

According to informants, other similar small, family workshops exist in Abidjan, but they are difficult to identify and visit.

Table 4

Number of workshops identified in the region of Abidjan, Côte d'Ivoire, and estimated number of carvers in the surveyed workshops, June 2002

Location	Number of workshops	Estimated number of carvers
Koumassi	6	50
Treichville	2	32
Cocody	1	5
Zone 4	1	1
Grand Bassam	1	not available
<b>Total</b>	<b>11</b>	<b>88</b>

Altogether, a total of 11 workshops were identified during the survey in the region of Abidjan, including the one unvisited workshop in Grand Bassam. This number does not include the other small family workshops that probably exist in the city and surrounding areas. A total of 88 carvers are estimated as being employed by the ten workshops visited within Abidjan. Most carvers are Guinean, possibly as many as 80%, as many confirmed that ivory carving in Côte d'Ivoire has traditionally always been done by Guineans.

According to the information obtained from different reliable sources, ivory workshops can be found in most of the secondary cities of the country, which host a craft centre (*centre artisanal*). Korghogo, in the north, is said to be a carving centre, as well as Bouaké, Daloa, Yamassoukro, Gnagnoa, Man and San Pedro. Abengourou, in the east near the border with Ghana, is also said to be an important ivory carving centre mostly supplying the Ghanaian market on the other side of the border. According to sources, there may be up to 25 carving locations around the country, but nowadays, most of the carvers in these workshops have turned to wood. This reflects the increasing scarcity of raw ivory supplies, poor market conditions since the international ivory ban, and the fact that most ivory carving is not done openly.

These findings were amplified in a survey carried out from 1992 to 1997 by a researcher at the University of Abidjan in the region of Daloa, a town situated 300 km northeast of Abidjan. This study identified Daloa as an active ivory carving centre before the international ivory ban, with the local industry employing between 80 to 90 craftsmen at that time. By 1992, however, the number of carvers had dropped to 25 and, in 1997, not a single carver at the Daloa craft centre would admit to being an ivory carver (S. Ouattara, pers. comm., June 2002). Regardless, although the majority of carvers are now engaged in wood carving, it does not necessarily mean that they no longer work ivory at all. It was explained that such carvers are able to switch from wood to ivory if the occasion for doing so arises. The ability to work with both wood and ivory is also true for the carvers found in the workshops visited in Abidjan.

### 3.4. Sources and prices of raw ivory

Vendors and shop personnel indicated that most of the ivory on their premises originated in Central Africa, specifically the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic in order of importance. The Democratic Republic of the Congo was often cited as the most important source of raw ivory. The few really large tusks seen in the shops and workshops during the survey were all identified as coming from the Democratic Republic of the Congo.

A very limited volume of raw ivory appears to be coming from within the country from both poached elephants and from private stocks. A pair of freshly poached tusks, easily recognised by appearance around the lip area and smell, was found in a Koumassi shop/workshop. The carving of this tusk had not been completed at the time of the visit, and one of the carvers claimed it originated from Côte d'Ivoire. Another six raw tusks were also being washed on the doorstep of a Koumassi shop/workshop, and these also most probably originated from Côte d'Ivoire. Although the government wildlife officials assert elephants in Côte d'Ivoire are not killed for their ivory, according to several other informants, elephant poaching for ivory does persist in the country, albeit on a limited basis. Currently, the elephant population of Côte d'Ivoire is estimated to consist of no more than 500 animals, according to local sources (W. Waitkuwait, pers. comm., June 2002), a figure somewhat lower than the



aggregated estimate in the African Elephant Database if speculative estimates are included (Blanc *et al.*, 2003). Sources indicated that illegal killing is often the result of continuing elephant-human conflict<sup>3</sup>. It was also discovered that raw ivory was sometimes obtained from privately-owned stock in the country. Some carvers claimed to purchase raw ivory from individuals in Côte d'Ivoire, who apparently have the economic incentive to sell off their private ivory collections locally.

Another source of raw ivory for Abidjan's workshops is the Customs authorities themselves. As explained by an ivory retailer, whenever there is an ivory seizure, Customs usually end up auctioning the contraband ivory to local carvers. These auctions concern not only raw ivory, but also worked ivory products.

The majority of the informants in the workshops and retail shops said raw ivory was mostly coming in from Central Africa by plane, particularly Air Afrique. This is similar to what transpires in other West African countries, especially Senegal. Before the company ceased operations in December 2001, raw ivory was easily conveyed on Air Afrique flights from Central Africa, and allegedly entered the country with the complicity of airline staff and local Customs at the airport. Raw ivory is also reportedly transported from Central Africa by road, often hidden in cocoa bags or beneath loads of timber. Finally, raw ivory was also claimed to be shipped by sea from Central Africa, but no details could be obtained on how the shipments are organized.

The owners of two different workshops in two different locations in Abidjan gave the same average price for raw ivory, which was between CFA70,000-75,000/kg (between USD115-123/kg). This price corresponds to an ivory piece of medium-sized and quality, but it can be much higher for large tusks above 10 kg in weight. All craftsmen and retailers questioned during the course of this study indicated that the price of raw ivory had gone up recently because of an increasing scarcity of supply.

The above-cited survey conducted by the University of Abidjan on elephant poaching in the region of Daloa found that, in 1997, poached ivory was sold at CFA12,000/kg (USD20/kg) by the poacher. The first middleman was then selling it at CFA30,000/kg (USD49/kg) to the workshop in Daloa, but already at this time, the price probably doubled once the ivory reached Abidjan (S. Ouattara, pers. comm., June 2002).

#### 4. DISCUSSION

##### *Status of the ivory market*

A total of 68 retail outlets were found to be carrying ivory products for sale in Abidjan and Grand Bassam during the course of this survey, collectively displaying an estimated 1,554 kg of ivory (see **Table 1**). For Abidjan alone, without including Grand Bassam, a total of 62 outlets featured an estimated 1,496 kg of worked ivory. In contrast, Martin and Stiles (2000) counted 52 outlets in Abidjan selling about 2,748 kg of ivory in 1999. Although ten more ivory outlets were counted in this survey, it is difficult to determine whether this actually represents an increase, as additional places were visited during this survey which were not identified in the Martin and Stiles (2000) report, and vice versa. Nevertheless, the Tiama hotel shop most certainly represents a new development as the hotel did not exist in 1999 when the earlier survey transpired. In terms of the number of vendors, both Martin and Stiles (2000) and this study identified 88 individuals selling ivory at the retail level in Abidjan. From these findings, it is reasonable to conclude that the number of ivory outlets in Abidjan is relatively stable when compared to the situation three years ago.

That said, the quantity of ivory on sale in Abidjan appears to have dropped considerably, reflecting a downturn in the retail market. Practically all ivory vendors in the markets, craft centres and workshops complained that business was not good these days due to a scarcity of clients. During the course of the current survey, only three prospective buyers - two Asian men and a French woman - were seen in the

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<sup>3</sup> It was reported that due to habitat loss and disturbance, elephants sometimes move away from Protected Areas and Classified Forests that are exploited for timber production and come into conflict with local people. Because farmers are not financially compensated for damage or losses, their solution is to engage local poachers to kill offending elephant (W. Waitkuwait, pers. comm., June 2002).

ivory shops and stalls in Koumassi. This contrasts with the findings of Martin and Stiles (2000) who quote vendors as having “a satisfactory” business and “no recent discernable decrease” in trade. Martin and Stiles (2000) further noted that “the Cocody Market in particular was full of foreign resident and tourist shoppers and several were seen by the investigator to shop for ivory”. In comparison, no more than ten tourists or expatriates in total were seen during three repeat visits to the Cocody Market in June 2002, and not one of these individuals was observed visiting an ivory shop. The vendors in the hotel and luxury galleries in Abidjan were the only ones to express some satisfaction with the trade in ivory products.

The current absence of tourist and expatriate buyers is directly related to the political situation in Côte d’Ivoire. As explained by the majority of retailers, the military coup in December 1999, and the subsequent and ongoing political crisis it evoked, has resulted in major negative impacts on the tourist industry. Tourists, who were the main ivory buyers, are no longer coming to Côte d’Ivoire, and the number of expatriates in the country has also declined. For these reasons, the current survey results show a reduction in the level of demand for ivory souvenirs that was prevailing in the 1999 survey presented in Martin and Stiles (2000).

### *Ivory carving and manufacturing*

Eleven workshops were identified in Abidjan and Grand Bassam during this survey, although two were not working with ivory at the time they were visited. This number does not include other small, private family workshops that reportedly exist in and around Abidjan, according to local informants. Martin and Stiles (2000) mentioned 12 ivory workshops in Abidjan in 1999. It would appear that the number of active workshops in Abidjan is stable or only slightly declining. Of greater significance, however, were apparent changes in the number of carvers. Martin and Stiles (2000) estimated a total of 107 craftsmen. In June 2002, the number of carvers is estimated to have dropped to 88 individuals, and almost all of them were working ivory on a part-time basis.

In terms of activity and the type of raw products found in the workshops this time as compared to three years ago, Martin and Stiles (2000) reported observing “15 kg of raw ivory in the form of cut sections of large tusks” in one workshop in Abobo, “craftsmen using mainly ivory in the courtyard workshop of Koumassi” and “several large bags lying on the floor which contained about 40 whole tusks.” In fact, during the current survey, only a few carvers were actually seen in the Abidjan workshops, with most working wood, especially ebony, at the time of visitation. Altogether, only three craftsmen were observed carving ivory. In addition, practically no stocks of raw ivory were seen in the workshops apart from a few raw ivory hollow sections in Treichville and six small raw tusks being washed in Koumassi. On the surface, it appears that the quantity of raw ivory being consumed in the workshops of Abidjan has declined as compared to the situation three years ago. A drop in the ivory supply may partially explain this development, a fact already mentioned in Martin and Stiles (2000), but the lack of demand on the domestic market as noted above is certainly a major factor. It appears that ivory carvers in Côte d’Ivoire are progressively reverting to wood carving and only work with ivory occasionally when fresh supplies are available.

### *Ivory consumers*

Although at greatly reduced levels from what was observed in 1999 (Martin and Stiles, 2000), most of the buyers of worked ivory are tourists, expatriates, Senegalese traders, diplomats from Asian countries, and some local African businessmen, according to the vendors interviewed. In contrast to the previous study, curiously, Americans were frequently cited as the main tourists buying ivory, even more



**Ivory seals and disks (painted to look like wood)**

frequently than French or other Europeans. Asian buyers mentioned by informants during this survey were most often Chinese and, sometimes, Japanese. It was not ascertained, however, whether these buyers were purchasing ivory as personal effects or for resale purposes. However, from the quantity of blank name seals found in certain workshops and shops, one could assume that some Asian clients were possibly engaged in the resale business. The large raw tusks seen

in the Koumassi complex were also said to be bought mostly by Asian diplomats, which could also be for resale purposes after being cut into sections, although this supposition was never confirmed.

### *The price of ivory*

Raw ivory prices were obtained from two sources, both of whom quoted an average price of CFA70,000-75,000/kg (USD115-123/kg). This contrasts greatly with data in Martin and Stiles (2000) which indicates that the price of raw ivory in 1999 was between CFA25,000 (USD41) for poor quality ivory and CFA50,000 (USD82) for the best quality ivory. Comparing these values in 2002 USD terms using the Gross Domestic Product (GDP) Deflator inflation index, it appears that the average price of raw ivory in Côte d'Ivoire has increased between 50-180% over what it was three years ago. Using the mid-range point in the adjusted data, an average increase of about 87% is found. The reasons for this development are unclear, but certainly include the recent scarcity of the raw ivory due to disruption of the Air Afrique supply line from Central Africa, but the availability of ivory itself could also be a factor if accessible elephant populations are declining from unsustainable poaching pressures in source countries. While the decrease in supply seems incontestable, it also needs to be acknowledged that there is decreased demand at the present time, which makes it difficult to interpret the significance of these data.

With an increased price for raw ivory, it follows that retail prices, as prevailing in the markets, craft centre and workshops in Abidjan today, should be higher than they were in mid-1999. Indeed, by comparing the average retail prices quoted in Martin and Stiles (2000) with the findings of this study, prices appear to have increased by approximately 80% on average, a figure that is very close to the mid-range increase for raw ivory noted above. Again, two reasons were cited by retailers for this development: the recent scarcity of raw ivory and the subsequent increase in the price of raw ivory.

### *Sources of ivory and trade routes*

The Central African region was identified during this survey as the main source of raw ivory supplying the workshops of Côte d'Ivoire. According to ivory vendors and craftsmen, most ivory comes from the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic, in order of importance, while Martin and Stiles (2000) cited the Democratic Republic of the Congo, Central African Republic and Cameroon. It appears that Gabon has been added to the list of main suppliers of ivory, but whether this is indicative of a significant shift in the source of ivory remains to be seen. What remains constant is that the Democratic Republic of the Congo is mentioned by the ivory traders as the most important source of raw ivory, and possibly more so today than three years ago. The very large tusks found in Koumassi and claimed to have originated from the Democratic Republic of the Congo are perhaps noteworthy, as Martin and Stiles (2000) do not report seeing any tusks of this size in 1999. Owing to their size, it would be difficult to transport such tusks unnoticed, and their presence suggests that controls along the trade route from the Democratic Republic of the Congo to Côte d'Ivoire are currently either very lax or easily circumvented.

In terms of trade routes and modus operandi, many informants alleged that ivory was routinely conveyed from Central African locations on Air Afrique flights. This was mentioned by various ivory dealers as the easiest and most common route into Côte d'Ivoire, at least up until December 2001 when the airline went bankrupt. This traffic allegedly unfolded with the complicity of Air Afrique staff and Customs officials, and was said to have functioned for some time. According to one vendor, the closure of Air Afrique six months previously had greatly disrupted the supply of raw ivory on the local market. While it was not possible to validate this information, the recent acute scarcity of raw ivory mentioned by many other ivory traders certainly coincides with the disappearance of Air Afrique flights from Central Africa.

The closure of the Air Afrique shipping route also probably explains the development of alternative sources of raw ivory from within the country, which were not mentioned in previous studies. Some carvers now claim to purchase raw ivory tusks from local private owners, even at a high price, as well as source ivory through ivory auctions held under the auspices of Customs. Finally, from what was seen in the Koumassi workshops, a limited supply of ivory derived from elephants poached within Côte d'Ivoire is also available on the market from time to time. This finding was similarly reported by Martin and Stiles (2000).

### *Regulation of trade*

Largely to comply with CITES requirements, *Decree No. 97-130* was promulgated in 1997 to regulate possession of ivory within the country and to control the domestic trade in elephant ivory. The Decree ostensibly forbids domestic trade in raw and worked ivory in Côte d'Ivoire, but traders were temporarily allowed to dispose of existing stocks. While the legislation marked a major advancement for regulating the ivory trade in Côte d'Ivoire, the Decree has been poorly implemented.

There are a number of loopholes which appear to be exploited in a manner that serves to maintain the status quo. Though a commendable first-step effort to exert control, the initiative to mark and register all ivory held within the country was not completed satisfactorily. Only a portion of the domestically-held stock of ivory was identified, marked, registered and recorded in the “*Registre des Ivoires*” (Ivory Record Book) at the Ministry of Water and Forests. It is worth noting that during the field survey, only one vendor in the shop Art et Tentations referred to a government-led ivory marking operation. In all other shops, boutiques, market stalls and workshops visited, not a single informant mentioned any control operation of any kind on the part of the authorities. As a result, it is doubtful whether retailers at the Cocody Market or the Koumassi complex had their stocks of ivory registered and marked. There is a need to revisit the nationwide registration procedure and complete the exercise so that a credible baseline of ivory stocks in the country is established.

The Decree also failed to establish a clear deadline by which time traders would be obliged to dispose of their stocks and cease trade in ivory products altogether. Without any deadline, the ‘clearing-out’ period could conceivably run indefinitely and be fuelled by a continuing illicit supply of ivory. This already seems to be the case in that the ivory shop in the newly-opened Tiama Hotel was certainly established after publication of the Decree and under normal circumstances would not be eligible to sell ivory products.

It also seems that inspection procedures to monitor the status of ivory at the retail level are simply not in place. The principal researcher was not made aware of any inspections on the part of the government authorities. As noted during the field survey, raw and carved ivory continue to circulate within Côte d'Ivoire and across its international borders without much control. Private owners of raw ivory continue to sell tusks to carvers without any declaration to the authorities in question. There was evidence suggesting that certain dealers are able to export raw tusks to Cameroon for carving and then import the carved pieces without being bothered by anyone. In the final analysis, although the wildlife authorities are aware of the illegal origin of most of the ivory being sold in the country and understand how the traffic is organised, not much is being done to correct this situation.

Worse yet, it was repeatedly alleged that Customs, and possibly the police too, not only prevent the CITES units of the Ministry of Water and Forests from inspecting luggage and cargo at the country's ports of entry and exit, they may also be directly involved in the illicit traffic themselves. The wildlife authorities certainly do not get the support they need from their administration to operate efficiently. This is evidenced by the fact that in the markets and workshops around Abidjan, no one seems to be much concerned about control during the transport of illegal products. The ivory traders spoke openly about how they pack ivory products to avoid inspection during export. The very large tusks from the Democratic Republic of the Congo seen in Koumassi also indicate that large pieces of ivory are moving into the country. It is worth noting that Martin and Stiles (2000) do not report seeing any large tusks in 1999.

### *Compliance with CITES requirements*

Considering the findings of this survey, domestic trade in Côte d'Ivoire, though declining, continues to function without much control or regulation on the part of the government. Internal measures taken in 1997 and 1998 to promulgate domestic legislation that buttresses the international decisions taken on domestic trade in elephant ivory at CITES CoP10. However, poor implementation means that the requirements of Resolution Conf. 10.10 (Rev.) are not being met. The exercise to register all ivory stocks in the country resulted in only certain public and private owners being registered, falling short of the requirement to register or license “all the manufacturers, wholesalers and retailers dealing in raw, semi-worked or worked ivory products”. There is little evidence to suggest that government inspections of the retail market are taking place or that an effective reporting and enforcement system has been operationalised. In terms of compulsory controls over raw ivory, serious allegations of

corruption within Customs to facilitate the importation of raw ivory through the international airport in Abidjan were frequently heard. The policy to deny wildlife authorities concerned with CITES implementation from access and inspection of passenger and freight areas of the airport seems deliberately designed to support the illegal movement of ivory into the country.

Côte d'Ivoire was not explicitly named as one of the target countries in Decision 12.39 which establishes a formal mechanism under the auspices of the CITES Standing Committee to assess compliance with the provisions pertaining to domestic trade in ivory in Resolution Conf. 10.10 (Rev.). The findings of this study, however, provide ample reason to reconsider the omission of this country in future applications of this mandate.

### *Implementation of ETIS*

The implementation of ETIS in Côte d'Ivoire is also problematic. The collection of data on seizures from the ground by the CITES Management Authority is deficient in many respects and the few cases which are at hand are certainly not communicated to the CITES Secretariat within the prescribed 90 days. Since the wildlife authorities cannot operate under normal conditions, there are very few data available on ivory seizures. In general, it is a finding of this study that Customs do not communicate information on ivory seizures and that most of the seized ivory is diverted to illicit destinations, including sales on the local market. In a welcomed development subsequent to this survey, officials in Côte d'Ivoire reported six elephant product seizure cases that occurred in 2002 to ETIS, but a collaborative system that supports the routine reporting of seizure data remains to be developed.



## DOMESTIC IVORY TRADE IN SENEGAL

*Marianne Courouble*

### 1. BACKGROUND

Senegal, which sits on the western edge of the African Continent, is sometimes characterised as a nation of traders renown for travelling long distances throughout Africa in pursuit of commerce. Historically, Dakar, with its favourable coastal position on the Atlantic Ocean, was a very early point of contact between Africa and European explorers, traders and colonists. As a result, it became an important trade centre in West Africa. Today, with numerous air flights and shipping connections, Senegal remains well linked to the rest of the world, particularly Europe.

Although African Elephants were historically found over most of the country, Senegal now remains a range State by virtue of a single population whose future remains very uncertain (Mauvais, 2000). Located in Niokola Koba National Park in the southwest of the country, various population estimates have placed numbers at between 20-30 animals in 1998, and possibly as many as 44 in 1996, but actual sightings at the time involved only some nine elephants (Barnes *et al.*, 1999). Since then, four systematic aerial surveys, conducted in both wet and dry seasons in 2001 and 2002, failed to locate any elephants whatsoever, although ground evidence at the time suggested the presence of two animals in the park (Blanc *et al.*, 2003). In view of these findings, Senegal has a very tenuous hold on its designation as a range State for African Elephants.

In the past, the international trade in ivory from Senegal flourished. It was recorded in 1786, for example, that a French trader sold 100 tonnes of ivory, representing the equivalent of 5,000 elephants, on behalf of the *Compagnie du Sénégal* (Dupuy, 1985). In 1909, the Sabathie ivory firm in Kédougou was still exporting several hundred elephant tusks to France annually (Dupuy, 1985). By 1913, however, elephants had largely disappeared from western Senegal and all elephant hunting was banned (Blanc *et al.*, 2003). Today, as noted above, elephants are on the verge of extinction in Senegal, but elephant ivory continues to be sold in the country's domestic ivory markets.

In Martin and Stiles (2000), Senegal was identified as being a significant ivory market within West Africa, but their study concluded that the sale of worked ivory in Dakar was slow and that trade in worked ivory appeared "to have decreased markedly between 1996 and 1999." The authors noted that this situation probably reflected moves within CITES to place sanctions against Senegal in early 1999 for failing to support the Convention with appropriate legislation (Martin and Stiles, 2000). The present study provides an update on the status of the domestic ivory trade in Senegal since that time.

### 2. METHODOLOGY

Field research was carried out in Senegal from the 21<sup>st</sup>-30<sup>th</sup> June 2002, with a series of visits to retail outlets and workshops in Dakar, Saly and Mbour to observe the availability of ivory on the local market and to assess a variety of factors associated with the trade. The field study was complemented by a series of meetings with relevant government authorities, representatives of conservation organisations and individual experts in Senegal. Assistance in organising certain meetings was provided by the office of the World Wide Fund for Nature (WWF) in Dakar. These meetings were designed to assess national legislation and policy concerning trade in ivory and, later, to supplement or confirm information collected during the market survey itself. The following eleven individuals were interviewed:



Map of Senegal

Courtesy of The General Libraries, The University of Texas at Austin

- Tamba Ba, Director, Directorate of National Parks;
- Papa Samba Diouf, Marine Programme Officer, WWF-WARPO;
- Lamine Faye, Head of Airport Unit, Regional Inspectorate of Water and Forests of Dakar;
- Lamine Gueye, Head of Forest Unit, Regional Inspectorate of Water and Forests of Dakar;
- Abdoulaye Kane, Country Representative, IUCN-Senegal Mission (formerly Head of CITES Management Authority);
- Geoffroy Mauvais, Technical Advisor for Niokolo Koba National Park, Directorate of National Parks;
- Gora Ndiaye, Inspector, Regional Inspectorate of Water and Forests of Dakar;
- M'Bor Ndione, Technical Assistant for Wildlife Management, Iles de la Madeleine National Park;
- Doudou Sow, CITES Office, Wildlife Management Sub-Directorate, Waters, Forests and Hunting Directorate;
- Abdoulaye Sy, Head of the Wildlife Management Sub-Directorate, Waters, Forests and Hunting Directorate, Head of the CITES Management Authority; and,
- Seydina Issa Sylla, Coordinator, West Africa Programme, Wetlands International (formerly Director of National Parks).

### 3. RESULTS

#### 3.1. Legislation and policy

##### *Legal framework*

There is no legal instrument that specifically addresses elephant conservation and trade in elephant products in Senegal, but elephants benefit to some extent from other, more general, wildlife legislation contained in the *Hunting and Wildlife Protection Act* (1986). With this Act, *Law No. 86-04* (24 January 1986), and the related implementation *Decree No. 86-844* (14 July 1986), form the basis for wildlife management in Senegal. These legal instruments mostly regulate hunting, capture and possession of wildlife and wildlife products. They also prescribe the attribution and issuance of hunting licences, provide sanctions for infractions and list the different categories of protected areas in Senegal.

Wildlife species in Senegal that are specified for protection are classified into two categories: 'totally protected species' and 'partially protected species'. Accordingly, the African Elephant is listed as a 'totally protected species' and, as such, the hunting and capture of elephants is strictly forbidden throughout the entire national territory. Thus, while hunting under licence with fixed hunting quotas is legal in Senegal, the hunting of elephants is prohibited. Although it is not expressly stated in the Act, the status of a 'totally protected species' could be interpreted to mean that any domestic trade in elephant products, including ivory, is not allowed (A. Sy, pers. comm., June 2002; A. Kane pers. comm., June 2002; S. Silla, pers. comm., June 2002). However, this interpretation does not at all appear to be what is presently practised in the country.

The Act also requires that possession and transport of any wild animal in the country, whether dead, alive, as a trophy or any other product derived from the animal, must be accompanied by a certificate of origin, a hunting licence, a licence of import, export or re-export, or some other proof of proprietorship. Issuance of certificates of origin for the possession or movement of wild animals or their products within Senegal is the responsibility of the Administration of Water, Forests and Hunting. With regard to international trade, the Act remains fairly vague. Nevertheless, it specifically states that, with the exception of legally-possessed hunting trophies, the export of raw ivory is forbidden. The Act also provides for penalties for the illegal import and export of 'partially' or 'totally protected' species in Senegal and their products, which certainly would include ivory.

Senegal became a Party to CITES in November 1977 and, by *Act No. 77-80* (23 June 1977), the Convention became domestic law and therefore a binding legal instrument in Senegal. While this could indicate that the international ban on ivory under CITES was therefore applicable, in fact, CITES implementation in the country has had a problematic history. At CITES CoP9, in November 1994, Senegal was identified as a country conducting a significant wildlife trade in CITES-listed species, but whose national legislation generally did not meet the requirements for implementation of the Convention. Such countries were invited on several occasions to improve their legislation, but Senegal

failed to take action. At CoP10, in June 1997, Senegal was advised that unless improvements in its legislation were affected, the CITES Standing Committee may be forced to suspend all trade in CITES-listed specimens, a message reiterated at Standing Committee meetings in March 1989 and February 1999. At the latter meeting, a decision was taken to defer a recommendation to suspend trade with Senegal until September 1999, but this did not result in any concrete developments. Thus, on 21 October 1999, the CITES Secretariat advised all Parties to refuse any import from, or export or re-export to, Senegal of CITES specimens until further notice. In response, on 28 December 1999, Senegal adopted ministerial regulations, *Arrêté portant réglementation du commerce internationale des espèces de faune et de flore sauvages*, which essentially met CITES requirements for regulating trade in accordance with the Convention. On 31 January 2000, the CITES Secretariat withdrew the recommendation to suspend trade with Senegal.

A new hunting and wildlife protection act, the *Code de la Chasse et de la Protection*, is currently under consideration in Senegal. In its present form, the draft bill is essentially an updated version of the *Hunting and Wildlife Protection Act* (1986), containing additional provisions to comply with other national legislation on decentralisation and to ensure alignment with, and implementation of, CITES. The provisions that support CITES provide a legal framework for international trade in wildlife products, including the issuance of import and export permits for all CITES-listed species and penalties for infractions of any CITES provisions. It is unclear when this legislation will be adopted, however, and the present draft of the Act does not contain any specific provisions concerning elephant conservation or trade in elephant products. While the African Elephant remains a 'totally protected species' in Senegal, there is some concern that the text of the new law continues to remain ambiguous regarding the status and regulation of domestic trade in elephant products. At the present time, there appears to be no regulatory measure or policy in Senegal that specifically addresses the possession of elephant ivory within the country or requires the registration and marking of national ivory stocks.

### *Implementation and enforcement*

Implementation of wildlife legislation in Senegal falls to the Ministry of Water, Forests, Hunting and National Parks. The Ministry comprises two Directorates: the Directorate of National Parks and the Directorate of Water, Forests and Hunting. The Directorate of Water, Forests and Hunting also functions as the CITES Management Authority in Senegal. The Directorate is, therefore, charged with the implementation and enforcement of CITES, and is assisted in this responsibility by agents from the Regional Inspectors of Water and Forests that cover the eleven regions of Senegal. Further collaboration is expected from agents working for the Directorate of National Parks, Customs and the police.

The implementation and enforcement of CITES provisions for trade in elephant products, in particular ivory, appears to be deficient in Senegal. In a series of interviews with several current and former representatives of the Administration of Water and Forests, the following problems were highlighted:

- **Insufficient legislation and regulatory policy:** The status of the domestic trade in ivory remains ambiguous. No measures have ever been taken by the government to register and mark either raw or worked ivory held within the country, or to establish any documentation requirements for legal possession. An attempt apparently was made in 1992 to register the national ivory stocks, but it was never completed. As a result, the ground agents do not have the legal and regulatory means to exercise control and undertake investigations satisfactorily. Although one could interpret the law to mean that the domestic trade in ivory is illegal, the ivory industry in Senegal continues unregulated. Although the Regional Inspectorate of Water and Forests of Dakar has conducted several inspections of the Soumbédioune market, the largest ivory outlet in the city, control efforts have always been thwarted by the ivory traders claiming that their ivory stocks pre-date the 1989 CITES trade ban.
- **Political and social constraints:** There are extremely powerful wildlife trade lobbies in Senegal with sufficient clout to influence government policy. The major lobby in this regard has strong religious underpinnings. Certain Muslim leaders, referred to as Marabouts, are reportedly linked to the wildlife trade, including ivory, and yield sufficient power to influence government policy in this regard. It was generally acknowledged by most informants that the Marabouts support the wildlife trade activities taking place in the Soumbédioune market and some are even important clients of the ivory traders. Senegal's wildlife traders are also



powerful economically and well-organised in their own right. Most traders have an operational base at the Soumbédioune market, where they have created their own guild, the “Federation of the Craftsmen of Soumbédioune”. As an illustration of their power, this body managed to hold a special audience with recently-elected President Wade in order to obtain the President’s support for their activities. With the protection of important politicians and political parties, some agents of the Water and Forests felt it was extremely difficult for them to actually undertake control procedures or instigate inspections for ivory with any degree of effectiveness. Because of the multitude of political and economic connections, local ivory traders are strong enough to continue their illegal activities with a kind of immunity from legal regulation and interference.

- Lack of access to ports of entry and exit: Water and Forests agents stationed at the international airport in Dakar are, as a matter of policy, denied access to key areas of the airport, the so-called Zone B, by Customs. Thus, they are unable to inspect or control any freight or luggage coming into the country. This, apparently, has always been the case, despite several attempts by the CITES Management Authority to correct this state of affairs. The same situation prevails at the country’s seaports where, again, Water and Forests agents are prevented by Customs to access key areas for the purposes of inspecting freight and cargo. For these reasons, Water and Forests agents complained they have never been able to make any seizure.
- Lack of collaboration between law enforcement bodies: Customs, at the entry points in the country, do not collaborate with the agents of the Water and Forests or those of the National Parks. As explained by the Water and Forests agents at the airport, when Customs seize ivory (or that of other prohibited wildlife product), not only do they fail to communicate such information to the Water and Forests agents, but they also keep the confiscated products, which then allegedly ‘disappear’ with the passage of time.

While the Head of the CITES Management Authority recognised that illicit ivory trade is going on in Senegal, it was felt that law enforcement deficiencies were the result of a lack of equipment and insufficient human and financial resources. In addition, it was also suggested that the agents in charge of CITES controls had “insufficient capacity and knowledge about CITES”. Water and Forests agents on the ground, however, claimed to be well informed of CITES provisions. It was reported that an internal workshop on CITES is organized every year within the Directorate of Water and Forests for its agents and those of the Directorate of National Parks. Such a workshop had last been held in November 2001. The Inspectorate of Water and Forests of Dakar also reportedly convened a CITES awareness workshop for traders and craftsmen of the Soumbédioune market so that they would understand Senegal’s international trade obligations under CITES. Some agents claimed that, if given a chance, they had the necessary equipment and human resources to operate effectively, and they suggested that the real problems inhibiting their performance lay elsewhere.

Another issue, which is often linked to the lobbies, is the existence of widespread corruption in Senegal. According to reliable informants, important members of the government may be involved in the illegal ivory trade. For example, in 1998, a special flight was organised to convey a consignment of ivory from Cameroon to Dakar. The Directorate of Water and Forests was informed, but faced with the deep involvement of the Cameroon Embassy in Dakar and officials within their own Ministry, the CITES officers and the ground agents were powerless to act. On many occasions, high-ranking officials in the government have taken initiatives against the CITES Management Authority to undermine the international commitments of Senegal regarding CITES. Water and Forests agents complained about the persistent corruption, which prevents them from fulfilling their duties effectively. Even when they manage to seize prohibited products, they say they know in advance that their initiatives are doomed to failure. The usual scenario is for pressure to be exerted on certain government representatives who arrange for the penalty to be lifted and the seized products to be returned to its owner.

As a consequence of the activities of powerful lobbies and the existence of corruption, there is an apparent absence of political will on the part of the wildlife authorities in charge to try to correct the situation. Understandably, there is a feeling amongst the men on the ground that they do not get the kind of back-up support and co-ordination they need to operate satisfactorily.

### *Ivory stockpiles*

As mentioned, there is no official policy in Senegal to manage ivory stocks and, in particular, government-held stocks. The Director of the Wildlife Management Unit, Head of the CITES Management Authority, was not personally aware of the existence of any ivory stocks in the country. Further, since 2000, when he assumed his position, no ivory had been received by the Directorate of Water and Forests. On their hand, the representatives of the Directorate of National Parks claimed they had some ten 'ivory tips' (which generally refers to tusks) in their offices, but they had never bothered to ascertain the weight of this stock. It seems clear that there is no ivory stock management system in place in Senegal.

### *Participation in ETIS*

Senegal's participation in ETIS was discussed at a meeting with the Head of the CITES Management Authority. A copy of ETIS Country Report No. 2 for Senegal, and a recent accompanying letter of TRAFFIC requesting data on seizures of illicit elephant products, was given to the Director of the Wildlife Management Unit. His comments illustrated very little concern on the part of the CITES Management Authorities of Senegal about national compliance with ETIS. In this regard, the Director of the Wildlife Management Unit explained that he was absent when the ETIS form arrived at his office and, for the past two years, he had never been informed of any ivory seizure in the country, although this did not mean that none had occurred. He suggested that collecting information on elephant product seizures would take some time, and he had not launched any such operation yet. It was also explained that besides responsibilities for ETIS, his Unit was very busy with many other important issues, like Ramsar, the Convention on Biodiversity and other wildlife management issues in Senegal. However, it was stated that if any ivory seizures had occurred, the ETIS form would be duly completed and returned to TRAFFIC in time for CITES CoP12. In fact, to date, Senegal had not submitted any data on ivory or any other elephant product seizures to ETIS.

### **3.2. Retails outlets and prices for worked ivory in Senegal**

All places identified in the Martin and Stiles (2000) survey were revisited. Additional locations carrying ivory were also found in Dakar, Saly and Mbour in the course of the present survey. The principal researcher did not go to Saint-Louis, the second most important city in Senegal, as informants advised that there was no ivory there, however, this observation could not be verified. The following was observed during the course of the survey (see **Table 1**):

#### *Dakar markets*

The *Village Artisanal de Soumbédioune*, commonly known as the Soumbédioune market, is the biggest African craft centre in Senegal. Located in a suburb of Dakar, it comprises at least fifty stalls and shops and several workshops, and is well known to European tour operators, who usually organize a visit for their clients at least once during their programme in Senegal. Numerous wildlife products, both legal and illegal, are found in the market, including many leather products fashioned from crocodile, which comes mostly from the Democratic Republic of the Congo, python, varanus lizard and snake skins, and a range of ebony and palmyra wood curios. Soumbédioune is said to be the final destination for many items obtained by the network of Senegalese traders who circulate throughout West and Central Africa in search of wildlife products. This is also the place where the largest quantity of ivory can be found in the country. During the present study, a total of 16 outlets in the Soumbédioune market were found selling ivory:

- One stall had a substantial amount of ivory, estimated at **130 kg**, including a pair of very large raw tusks, about 1.50 m in height and weighing at least 50 kg, for CFA5 million (USD8,196). According to the shop vendor, these tusks had been imported from the Democratic Republic of the Congo for a diplomat. The remaining stock on display was estimated to weigh 80 kg. These items included eight large busts and heads weighing about 4-5 kg each, which were identical in style to ones seen in Abidjan, and about 30 25-35 cm high carved tusks and statues. There were also quite a few carved animals of 300 to 500 g and a large quantity of ivory bracelets.

- A second stall was carrying about **29 kg** of ivory, consisting of various smaller items. The largest items were two pairs of small polished raw tusks at CFA170,000/pair (USD279/pair) and one pair of 35 cm high statues of hunters weighing about 1.2 kg at CFA290,000 (USD475). The owner, a prosperous Senegalese trader, was proud to show the four other shops and stalls he possessed in the market, two jewellery shops and two stalls selling crocodile and other leather goods, and various African craft items. Questioned about the various style of carving in his ivory stall, he replied he was importing pieces of worked ivory from various countries, namely Côte d'Ivoire, the Democratic Republic of the Congo, Cameroon and Gabon. He also had some locally-manufactured ivory pieces in his workshop. When the researcher feigned interest in buying a considerable number of ivory products, he said he could easily supply such a volume. He explained he was regularly travelling to Europe to participate in trade fairs to sell African arts and crafts. He indicated that soon he would go to such a fair in Portugal and, every year, he participated in the Fair of Paris (*Foire de Paris*). On these occasions, he explained, ivory products for European clients would often be hidden in containers with the rest of the goods conveyed to Europe. He even claimed he had a stock of ivory, including raw tusks, at a store in Quimper, Brittany (France). Finally, he said business in Soumbédioune was good, there was no control by the authorities, and he had not perceived any decline in the sale of ivory over the past three years. His main buyers were tourists, especially French, but also included many members of the local diplomatic community.
- Another two stalls were carrying about **20 kg** and **12 kg** of medium and small-sized items respectively.
- In the next market alley, there were two shops selling ivory which were the showrooms of a workshop. One had an estimated **6 kg** of various items exhibited in a showcase, and the second one, which led directly to the workshop through a side door, was carrying about **9 kg** of ivory products. The style of carving was again varied. One of the two owners, explained they were importing carved ivory pieces from Côte d'Ivoire, parts of Central Africa, Guinea and even a few pieces from Zambia, beside the items carved in their own workshop. Two 30 cm high hollow lamps, at CFA200,000 (USD328) each, were said to have come from Zambia. There was also a pile of blank name seals, and a 20 cm high section of half a tusk, carved on one side, weighing about 600 g and costing CFA150,000-250,000 (USD246-410). There were some other elephant products in the shop adjoining the workshop, notably a few elephant hair bracelets, an elephant tail, which came from Guinea according to the vendor, and a piece of elephant jaw with teeth. There were also all kinds of reptile skin goods on display in the shop.
- Finally, another ten outlets all featured small quantities of ivory, overall about **25 kg** in total. It included four jewellery shops selling between 2-5 kg of ivory, mainly bracelets, but also necklaces and rings. The other stalls had some necklaces and various small ivory items among other African craft articles.

Overall, the large quantity of bracelets seen in the market was rather remarkable.

### *Dakar hotels*

**Le Meridien**, at the *Pointe des Almadies*, hosts two shops selling African arts and crafts and other items. Ivory was found in both. The first shop was carrying 110 items, totalling approximately **4.5 kg**, including five lobsters of about 300 g at CFA60,000 (USD98) each, three 15 cm high statues at CFA55,000 (USD90), 20 small bracelets of about 50 g at CFA20,000 (USD33) each, three small animals of 200 g at CFA50,000 (USD82), four bunches of 12 fruits of 5-20 g each at CFA40,000 (USD66) per bunch, three 100 g necklaces at CFA40,000 (USD66), and a few rings and earrings. The style of carving was different and not as fine as those seen in Abidjan. One of the two Senegalese vendors, apparently the owner of the shop, explained she was buying the carved items at the Soumbédioune market, although she believed it was coming from Côte d'Ivoire and Cameroon. The second shop was also owned by a Senegalese woman. She had only four ivory items on display, weighing about **300 g** in total. This stock included two 12 cm high swordfish, which the vendor said were very popular with French tourists coming to Senegal for sport fishing. Questioned about the origin of the ivory, she replied she was buying sections of raw ivory and having it carved in town by different Senegalese craftsmen. She added it was relatively easy to get raw ivory from Customs

officials at the airport. She refused to divulge how much she was paying for one kilogramme of raw ivory, but she said the price had gone up recently. According to her, the raw ivory was coming from Central Africa. She had various suppliers of raw ivory, but the supply was scarce, she added.

At the **Novotel**, 26 ivory bracelets and necklaces, with a total weight of around **1 kg**, were displayed in a glass shell in the lobby of the hotel.

The **Club Méditerranée** nearby was still closed for renovation until mid-July 2002 and no ivory was found at the **Sofitel** hotel.

### *Dakar other shops*

In the **Centre Artisanal** (craft centre) in the Pointes des Almadies, just behind the Club Méditerranée, approximately **2 kg** of ivory was found in four stalls selling African curios. Three stalls had only a few rings and necklaces, and one had some 10 cm high figurines and 5 cm heads. Some stalls had a few carved pieces fashioned from warthog teeth. There were also a few elephant hair bracelets. The vendor explained he was making them himself from elephant hair brought to him from Côte d'Ivoire. The vendors of the little craft centre were apparently aware it was forbidden to sell ivory to tourists. One said his stall was full of tourists buying ivory before the international ivory ban. All complained that business was not good since the nearby Club Méditerranée had temporarily closed.

Ivory was found at various locations within the Plateau (city centre):

- Not a single piece of ivory was found in the African art shops on the **Rue Mohammed V**, but a small jewellery shop in the middle of **Rue Carnot** was found to carry an estimated **2 kg** of ivory, bracelets and rings and a few elephant hair bracelets. The shopkeeper said it was imported ivory, without specifying from where.
- Among the numerous African arts and crafts stalls in front of the **Kermel Market**, three were selling ivory. One had about **1.5 kg** of ivory, consisting of three 20 cm high statues, and two others, owned by two Senegalese brothers, carried some **8 kg** and **27 kg** of ivory respectively. Among the ivory on sale were several pieces of a substantial weight: three 35 cm high raw tusks (of about 700 g each) at CFA400,000 (USD656), about ten 20 cm high statues at CFA85,000 (USD139), one bust weighing about 1.2 kg and many smaller items such as animals, masks, small busts, bracelets, necklaces and rings. The sellers said most of the items were imported already carved from Côte d'Ivoire, while the rest was carved in their own family workshop in a small town north of Dakar. They did not complain about any decrease in their business over the last two years, and said that tourists were their main buyers.
- In the same street, the **Galerie Le Boofta**, a shop selling African art and jewellery, carried an estimated **11 kg** of medium to small-sized ivory items, including one hippo weighing about 350 g and costing CFA200,000-300,000 (USD328-492), a few belts, bracelets and necklaces, and some chopsticks. The two women in the shop said the ivory was imported already carved from Côte d'Ivoire.
- In the **Avenue Albert Sarraut**, an African arts and crafts dealer had no more than **600 g** of ivory bracelets and necklaces on display in his small shop. He also said these products were brought to him from Côte d'Ivoire by an ivory trader.
- In the **Avenue Pompidou**, none of the street stalls were found to offer a single piece of ivory. In the same street, the **Galerie Orientale**, near the Place de l'Indépendance, was visited. This shop offered a 25-50% discount on its goods, a sign that the business was not doing well. From the tarnished colour of the estimated **8 kg** of ivory displayed, the items had probably been there for a while. Most of the small items displayed reportedly came from China, the rest, some 15 5 cm high busts and 20 small and medium-sized fruits, were said to be from Africa.
- Another quite luxurious antique African art shop, **Galerie Antena**, down the Avenue Felix Faure, was selling an estimated **16 kg** of worked ivory. Many of the fine larger pieces found in the shop had been described in detail by Martin and Stiles (2000). Three years later, these

same items were practically the same price: four big busts of about 1.5 kg at CFA695,000 (USD1,139), two smaller ones at CFA295,000 (USD484), and a rendition of the Last Supper at CFA495,000 (USD811). When the principal researcher declared the real purpose of her visit to the owner of the shop, a French expatriate, he suddenly showed an extreme uneasiness. He claimed that all the ivory displayed was old stock and he was not selling any ivory anyway. This was probably true for the majority of the big items. However, when questioned about a pile of blank name seals, the vendors assistant had previously replied that they were usually bought by Asiatic clients. Judging from the style of carving, some pieces had no doubt been imported from Côte d'Ivoire. The owner, however, said the ivory came from Sudan, but did not seem to be too sure about this. He was apparently fully aware of the international ivory ban. He tentatively said he had heard it was now allowed to hunt savanna elephant for their ivory, while forest elephant hunting remained forbidden.



© WWF-Canon / Martin Harvey

**African Forest Elephant**  
*Loxodonta africana cyclotis*

- Ivory was also found in the **Sandaga Market**, at the end of the Avenue Pompidou. In the jewellery market (*Cour des Orfèvres*), the researcher found three jewellery boutiques carrying very few ivory items, no more than an estimated **2 kg** of very small pieces (bracelets, necklaces and rings). The three shops were also selling elephant hair bracelets. One of the vendors showed a large bag of elephant hair from which he was making bracelets. He said the hair came from the Democratic Republic of the Congo and was obtained, together with the ivory, from Senegalese traders. Along the **Avenue Blaise Diang**, another ten jewellery stalls were collectively selling about **15 kg** of ivory bracelets and necklaces. According to the vendors, the ivory was coming from Central Africa. They were also selling many elephant hair bracelets.
- Further down the Avenue Blaise Diang, an informant told the researcher he had seen elephant feet in the stall of a Malian trader a few months ago, among other prohibited wildlife products.

No ivory was found at the international airport.

### **Saly**

Saly is a very popular beach resort 100 km south of Dakar. It is frequented by tourists, especially in winter time, but only limited quantities of ivory were found there during the present survey. Three outlets in the **Village Artisanal** (craft centre) were carrying about **4 kg** of small pieces. One stall had an estimated 3 kg of ivory, mostly bracelets and necklaces, a few 100 g animals and 200 g busts. One of the two vendors said she sold a lot of ivory items to tourists, especially the French, during the high tourist season in winter.

In front of the Village, a jewellery shop exhibited about **1.5 kg** of ivory bracelets, necklaces and rings. The owner said he had parents in Côte d'Ivoire who periodically brought him pieces of raw ivory which he had carved in Dakar.

On the other side of the resort, the open air shopping centre included five African craft shops carrying approximately **7 kg** of ivory in total, mostly bracelets and necklaces, but also two 90 cm high walking sticks.

### **Mbour**

Mbour is a small town 10 km south of Saly. In a very small shop in the centre of town, an old woman was selling about **11 kg** of ivory bracelets. These were the only items in the room. A few were displayed in a glass counter, the rest was loose in several plastic bags lying on the floor. According to

local informants, the woman was well known in the region and her husband reportedly carved the bracelets.

Table 1

Summary of surveyed retail outlets in Senegal, June 2002

Outlet location	Number of outlets	Estimated weight (kg)	Estimated number of vendors*
Village Artisanal de Soubedioune	16	231.0	20
Meridien-Dakar	2	4.8	6
Novotel-Dakar	1	1.0	1
Pointe des Almadies-craft centre	4	2.0	4
<i>Dakar Plateau:</i>	1	2.0	1
Rue Carnot			
Front of Kermel Market	3	36.5	3
Galerie Le Boofta	1	11.0	2
Avenue Albert Sarraut	1	0.6	1
Galerie Orientale	1	8.0	3
Galerie Antenna	1	16.0	3
Sandaga Market	13	17.0	13
<i>Saly:</i>	3	4.0	5
Village Artisanal			
Jewelry shop	1	1.5	1
Open-air shopping centre	5	7.0	6
<i>Mbour:</i>			
Centre of town	1	11.0	1
<b>Total</b>	<b>54</b>	<b>353.4</b>	<b>70</b>

\*The estimated number of vendors also includes the owner, as in some cases it is the same person.

*Retail prices in Dakar*

Tables 2 below gives some indication of retail prices for various ivory items in Dakar in June 2002. The prices of these worked ivory products, all found in craft centres, workshop showrooms and markets, do not include the fixed prices found in the up-market shops in the city centre or in the more expensive hotels, as such prices are usually considerably higher.

The prices presented in Table 2 represent an average of the price data obtained in different locations for the same general item after some degree of bargaining. It must be noted that prices can vary, not only according to the weight of the piece in question, but also due to the quality of the carving. The price of a similar piece in the same location can also differ greatly from one vendor to another, and whether the client is a tourist or a trader. The price data is therefore indicative and should be interpreted with some caution.



Table 2

Range of average retail prices of ivory items in Dakar, Senegal, June 2002

Items	Description	Average prices (in CFA)
Raw polished tusk	1.50 m high, 25 kg	2.5 million
	35-40 cm high, 600-800 g	180,000-200,000
	20-25 cm high, 400-500 g	75,000-85,000
Carved tusk	25-35 cm high, 600-800 g	120,000-150,000
Bust/head	20 cm high, 1.5 kg	550,000
	5-10 cm high	40,000
Statues	40 cm high, 600 g	1450,000-160,000
	20 cm high, 250 g	55,000-85,000
Mask	200 g	50,000
Animal	350 g	95,000
	200 g	60,000
	100 g	45,000
Carved half tusk section	30 cm high, 600 g	200,000
Lobster	30 cm large, 300 g	60,000
12 small fruits	10-20 g each	18,000
Bracelets	2 cm, large	18,000-25,000
	thin	8,000-15,000
Necklace	100 g	20,000-25,000
Paper knife	25 cm	15,000
Ring and earring	2-5 g	2,000-5,000

### 3.3. Ivory carving and manufacturing in Senegal

This survey has demonstrated that probably at least half of the worked ivory on sale in Senegal is imported from other West and Central African countries. In this regard, the vast majority of imported carvings come from Côte d'Ivoire, with the rest originating in Cameroon, the Democratic Republic of the Congo, Guinea and Gabon. The remaining half, which is carved in Senegal, was easily recognisable by the style of carving. While Senegalese are renowned as good traders, their carving is not nearly as fine as that done by Guinean carvers (based in Côte d'Ivoire), according to most observers. One of the main ivory traders in Soumbédioune explained that it was increasingly difficult to obtain raw ivory as the supply had become very sporadic. Thus, market demand is increasingly being met through the importation of worked ivory products.

It was only possible to visit one ivory workshop during the survey of Dakar, although several other workshops throughout the country were suggested (see **Table 3**). According to informants, the biggest ivory carving workshop in Dakar (and, indeed, in the whole of Senegal) is located in the craft centre of Soumbédioune. Several local retailers were also questioned about this workshop and all said that it was the only ivory workshop in the Soumbédioune market and was the largest in town. The principal researcher visited it on two occasions, each time pretending to be a French trader. The owners were two Ivorian brothers who said they employed 25 carvers, all Senegalese, who were working ivory on a part-time basis. During the researcher's first visit, six carvers were seen working, four were carving warthog teeth and ebony, the rest were carving ivory Buddhas of about 300 g each. One of the two owners explained it was an order for a Chinese client, working at the Chinese Embassy in Dakar, who

had requested a series of Buddhas. The owner took out several sections of raw ivory, about 7 cm large and 10 cm long, from a trunk lying on the floor to show the raw material to the researcher. On the second visit to the workshop, all the carvers seen were carving ebony. The two Ivorian owners claimed they imported both raw and worked ivory for other retailers in Soumbedione and other parts of town. They added most of the ivory traders in the market had many ivory products, including special orders, carved in their workshop. They told the researcher the raw ivory was mostly coming from Central Africa, especially from Cameroon, the Democratic Republic of the Congo, Gabon and Central African Republic, but confided that the current supply was rather sporadic. Apparently, however, they had sufficient stocks on hand. They said business was generally good, and that the majority of their clients, representing Korean, Chinese, Senegalese Marabouts, and European nationals (in order of importance), were buying for resale. They also sold directly to tourists. With respect to the regulation of their businesses, according to them, they had never been subjected to any kind of control from the authorities, but they were apparently fully aware of CITES and of the international ivory ban. They told the researcher that all their ivory was pre-1989 stock.

As the survey progressed, the researcher was able to confirm through a reliable source that the Ivorian owners of the Soumbedione workshop were indeed the major importers of ivory in the country, both for their own use or for re-sale to other dealers in the market and elsewhere in Dakar. According to this source, the workshop was particularly active during the night, when supplies of raw ivory would actually come in. This could partly explain why very few craftsmen were seen carving ivory during the daytime visits. It is worth mentioning here that the Soumbedione market contains many other active workshops working in wood or with various wild animal skins.

During the survey, information was gathered from various outlet informants on numerous small family workshops or individual carvers that apparently exist scattered throughout Dakar and other parts of the country. Although it was not possible to estimate their total number, the following was suggested:

- In the little craft centre at the **Pointes des Almadies**, a retailer, with only a few small ivory items in his stall, told the researcher that he had many more pieces at home, in **Mboro**, a small town about 100 km north of Dakar. He explained he had a small family workshop there where his uncle was the ivory carver. This carver was now mostly working with warthog teeth as ivory was very scarce, he added. According to him, the ivory came from Central Africa. He was aware that ivory was a prohibited product, nevertheless French people sometimes ordered special carvings from him.
- A jewellery seller in the **Sandaga Market** claimed to have his own tiny workshop at the back of his boutique, where he carved the few ivory bracelets, necklaces and rings on display in his shop. Questioned about the source of the ivory, he replied he was supplied by an African antique art trader next door, who usually brought the ivory from Cameroon with the rest of his goods.
- In front of the **Kermel Market**, two stalls, owned by two Senegalese brothers, were partly supplied with ivory products coming from their own family workshop. They said it was located in the north of the country on the road from Dakar to Saint-Louis. It was not possible to know how many carvers were working there, but probably not more than two craftsmen were employed.
- In the craft centre of **Saly**, the stall containing the greatest quantity of ivory was also linked to a family workshop. The father of the two Senegalese vendors was said to be a carver in Zinguinchor, a small town in Casamance, in the south of Senegal. They indicated the raw ivory they worked came from Côte d'Ivoire and Kenya.
- In **Mbour**, the old woman selling the large quantity of bracelets was supplied by her husband, a Senegalese craftsman. Not surprising, she refused to show the workshop to the researcher as it was located within her home. Questioned about the source of ivory, she said it came from Kenya and Cameroon.

According to the owner of one of the two shops in the Meridien, many small family workshops exist in Dakar, but most work ivory in secret as it might be regarded as an illegal activity in Senegal. There are also probably a number of individual craftsmen, with small jewellery boutiques in the Plateau and in

other markets in Dakar, who carve small ivory accessories from time to time when they acquire a piece of raw ivory from a relative or some other trader.

Table 3

Number of workshops identified in Senegal and estimated number of carvers, June 2002

Location	Number of workshops	Estimated number of carvers
Dakar – Soubedioune	1	25
Dakar – Sandaga Market	1	1
Mboro	1	1
Between Dakar and St Louis	1	2
Zinguinchor	1	1
Mbour	1	1
<b>Total</b>	<b>6</b>	<b>31</b>

The 31 carvers reportedly identified in the course of the survey were all Senegalese, and most of them only work in ivory on a part-time basis, carving wood or warthog teeth in the absence of raw ivory.

### 3.4. Sources and prices of raw ivory

According to the information collected during this survey, most of the raw ivory in Senegal is reportedly imported illegally from Central Africa, especially the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic. Cameroon was most frequently mentioned by the ivory traders. However, it is difficult to say whether this actually means that Cameroon is the country of origin for the ivory in question or only the most recent centre of collection before transport to Senegal. Kenya was also cited as another ivory source by two outlets, both located in the area of Mbour-Saly. It is difficult to say whether this is reliable information, but it could be possible that the two related workshops are getting their raw ivory supply from the same ivory trader. The French owner of the Galerie Antenna also claimed that raw ivory was imported from Sudan. Other informants said some amount of raw ivory came from Côte d’Ivoire. Indeed, it would certainly be feasible for Senegalese traders, or members of the same family, to bring pieces of raw ivory back from Côte d’Ivoire, among the various other goods that are routinely imported.

With respect to trade routes and the *modus operandi* for ivory entering Senegal, reliable information was independently verified through several different individuals in the course of this survey. Such queries inevitably garnered the same responses. A principal source of information stems from an investigation carried out in Dakar from April to September 2001 by the Directorate of National Parks. This survey, supported by a small grant from the US-based Friends of Animals, was designed to monitor the illegal international trade in prohibited wildlife products taking place in Dakar, including ivory, wood, wild animal skins, and other items. This report confirmed that most raw ivory entering Senegal was generally transported by plane, arriving at the Dakar international airport, Leopold Sedar Senghor.

As similarly discovered in Abidjan, up until December 2001, Air Afrique was identified by various informants to have been the principal conveyor of ivory between Dakar and Central Africa. The transport of ivory was handled by African women of different nationalities from the region whose husbands allegedly worked for Air Afrique. They were able to travel at low cost from Central Africa to Abidjan or Dakar, and they apparently had easy access through the airports in question. Most of the time, the women personally carried raw ivory which had been cut into 10 cm pieces and placed in large canvas bags. Ivory traders in Dakar were always well informed and knew exactly when such ivory would be delivered at the airport. They would usually have their own men at the airport to receive the ivory, and allegedly Customs would facilitate the passage of the contraband through the control channels. Such trafficking usually took place at night and, in most cases, the final destination of the ivory was Soumbédioune. This system had reputedly existed for several years until Air Afrique ceased operations at the end of 2001. Large quantities of raw ivory from the Democratic Republic of the Congo, Gabon, Cameroon, and, to a lesser extent, Central African Republic were repeatedly imported through this manner into Senegal for several years. Important stocks of ivory were allegedly

accumulated by the ivory traders in Senegal, and these stocks are still significant today, according to the same sources. Air Afrique's closure was no doubt a setback for Senegal's ivory traders, but according to informants, most of the former Air Afrique staff have since been hired by other regional African airlines and alternative supply channels are beginning to emerge.

Another important route used to convey illicit consignments of raw ivory entering the country, appears to be the main road coming from Guinea going through Medina-Gounas, a small town on the western side of Niokolo Koba National Park, and leading to Dakar in the north. As explained by a French expert working in this part of Senegal, every week, several trucks loaded with illegal shipments of wood (palmyra wood and other timber species) would enter from Guinea on this road without any control by Customs or the police on either side of the border. According to rumours, raw ivory tusks would sometimes be hidden in the timber. Another informant referred to a seizure of about 25 large ivory tusks that was apparently discovered hidden in a timber trailer sometime around 1995, but no further details could be obtained.

The Marabout in Medina Gounas are reportedly involved in the illegal trade traversing this road. While timber, and sometimes ivory, is allegedly illegally transported northward, an illegal trade in wild meat from Medina-Gounas, which involves Guinean militias based in the region, moves in the opposite direction to supply Guinea in the south. A French expert in the region reported that a young elephant was poached recently in Niokola Koba National Park as a local informant claimed to have seen a pair of small ivory tusks, together with bags of elephant meat, sometime near the end of June 2002 (G. Mauvais, pers. comm., June 2002). The meat was sold in Medina-Gounas to Mauritanian traders, according to others, but there is no information on the destination of the ivory tusks.

Finally, raw ivory is also conveyed into Senegal through a third route. On occasion, shipments of prohibited wildlife products, including ivory, arrive in the Port of Dakar. According to sources, the traders of these products, from different West African countries, especially Mali, Guinea and Mauritania, have their own dock at the port, called 'the Malian quay' (*Quai des Maliens*), which functions with the complicity of Customs. Many West African traders doing business in Dakar use this dock to circumvent Customs controls.

Rail was also mentioned as a potential means of transport of raw ivory into Senegal, but no further details were obtained.

During the survey, information on the price of raw ivory in Senegal was collected from two different sources. One of the owners of the workshop in Soumbédioune claimed that the current price for raw ivory of a poor quality was CFA70,000/kg (USD115/kg), for instance the cut sections of broken tusks. Investigators commissioned by the Director of National Parks reported that, in late 2001, the price of raw ivory ranged from CFA80,000-100,000/kg (USD131-164/kg). Price is variable depending on the quality and size of the tusk, but about CFA85,000/kg (USD139/kg) was considered as a fair estimate for the prevailing average price for raw ivory in Senegal.

#### 4. DISCUSSION

##### *Status of the ivory market*

In the course of this survey, ivory products were found for sale in 54 outlets, 44 of which were in Dakar. This contrasts with the 1999 survey which identified 30 ivory outlets in Dakar (Martin and Stiles, 2000). Because additional places in Dakar were visited during the current survey, it is difficult to conclude that there are more outlets selling ivory today than was the case three years ago. It can be asserted, however, that there has been no decline in this respect. Concerning the volume of ivory observed, it was reported that an estimated 407 kg of ivory was observed in Dakar in 1999 (Martin and Stiles, 2000), while this survey found some 330 kg of ivory on display in Dakar (out of the total estimate of 353 kg which includes the results of Saly and Mbour). These data suggest a decrease in the quantity of worked ivory on sale in the Dakar market as compared to three years ago, however, it is probably premature to regard the apparent reduction as an indisputable downward trend. It is recognised that there may be differences in the personal assessment of ivory stocks between the two studies.

In general, during the current survey, the principal researcher did not experience any particular difficulty in securing information from ivory retailers. This contrasts with what was reported in 1999 when vendors of the Soumbédioune market were found to be the “most uncooperative of any encountered” during a survey of eight West and Central African countries, adding that it was “very difficult to obtain any information” (Martin and Stiles, 2000). This difference may reflect a greater laxity on the part of the authorities today than was the case previously. It needs to be appreciated that Senegal was under a great deal of pressure from the CITES Standing Committee to improve its legislation by 30 September 1999 or face a suspension of trade, and the Martin and Stiles (2000) study occurred just two months prior to this deadline. It is also possible that the methodology of using a French-speaking female researcher posing as an interested trader allowed for more effective access and discourse with the ivory traders in question.

It is also worth noting that during the 1999 study, no large pieces of worked ivory and no tusks heavier than 5 kg were observed (Martin and Stiles, 2000). During the current survey, several large pieces of carved ivory, similar to ones seen in Abidjan, and two large 1.5 m polished tusks were found. This could indicate that the import of larger pieces of worked ivory is now easier, possibly because there are fewer controls at the points of entry into the country, or that there are fewer inspections at the retail level today than was the case three years ago.

During the present survey, the ivory traders did not voice any complaints about a reduction in their activities over the last few years. To the contrary, the general impression was that the ivory business was rather good. While there are certain minor differences between the 1999 and the 2002 surveys in terms of results, overall, there does not seem to have been any major changes in the retail market in Senegal over the last three years. Overall, the situation appears to have remained rather stable in spite of some disruption of the principal supply routes from Central Africa as described elsewhere in this report.

#### *Ivory carving and manufacturing*

Regarding the manufacturing of ivory in Senegal, this survey found evidence of six workshops in total, including the principal one visited in Soumbédioune. However, the researcher was told there were many other individual carvers working in secret at homes in and around Dakar. In 1999, two workshops were found in Soumbédioune, employing three and one carver respectively (Martin and Stiles, 2000). During the present survey, the single workshop found in Soumbédioune employed some 25 craftsmen. While it may appear that ivory production has increased in recent years, the current results probably have more to do with differences in methodology or timing, rather than any potential changes in the industry itself. It is clear, however, that Senegal is not nearly as important an ivory manufacturing centre as Côte d’Ivoire. The largest workshop in the country is certainly the one in Soumbédioune and, according to sources, 75% of carvers are Senegalese nationals. However, this should be contrasted with the fact that the vast majority of the worked ivory pieces seen in the retail outlets of Dakar were imported from outside the country.

#### *Ivory consumers*

Another finding of the present study confirms that the trade in worked ivory in Dakar not only concerns European tourists or business people looking for souvenirs or gifts, but also buyers who purchase ivory for resale. In this regard, ivory traders indicated that Korean, Chinese (including diplomats based in Dakar), Senegalese Marabouts and possibly even a few European nationals were engaged in resale trade.

#### *The price of ivory*

From the data gathered during this survey, it appears that the average price of raw ivory prevailing in Dakar today is around CFA85,000/kg (USD139/kg), although depending on quality the price could range from CFA70,000-100,000/kg (USD115-164/kg). Although Martin and Stiles (2000) expressed reservations about the quality of their raw ivory price data for Senegal, they estimated a price of USD100-120/kg in 1999. If these data are adjusted into 2002 USD terms using the Gross Domestic Product (GDP) Deflator inflation index, then it appears that the price of raw ivory in Senegal has increased between 24-30% over the last three years. As noted in this report, the supply route for both Côte d’Ivoire and Senegal is essentially the same, however, traders in Dakar, being 1,800 km northwest

of Abidjan, pay a premium of up to 34% for raw ivory over those operating in Côte d'Ivoire. This indicates a progressive increase in the price of raw ivory as one moves further away from the prevailing sources of raw ivory in Central Africa, a finding that was also noted in Martin and Stiles (2000).

The reason for the increasing price of raw ivory in Senegal is no doubt an increasing scarcity in supply. As in Abidjan, several ivory retailers encountered in Senegal complained that raw ivory was now more difficult to obtain, and availability more sporadic, than previously was the case. Although the price data must be viewed with considerable caution, the retail prices of worked ivory noted during this survey seem, in general, somewhat higher than those reported during the 1999 survey (Martin and Stiles, 2000).

### *Sources of ivory and trade routes*

Retail informants in Senegal, like those in Abidjan, indicated the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic as the main countries of origin for the raw ivory in the trade. Most ivory reportedly came into Senegal by plane and, up until December 2001, individuals connected with Air Afrique were allegedly the principal suppliers to Dakar, transiting Abidjan in the process. These sources of raw ivory can not be compared with the Martin and Stiles (2000) report because, apart from the doubtful information of the owner of the Galerie Antenna who suggested Sudan as a source in both surveys, no information on ivory sources was contained in the earlier study. It should be noted that Kenya was also identified during the present survey, but there is no way to confirm the accuracy of this information or whether it represents a new development. And finally, on one occasion some worked ivory products were alleged to have originated in China, a trade pattern that is certainly out of the ordinary.

Despite an increase in the prices of worked ivory and raw ivory, the survey has shown only a modest decline in the volume of ivory available on domestic market in Senegal since a similar study three years ago. As there has been little change in the government's policy for controlling this trade, the reduction in the volume of ivory found at the retail level is attributable to other causes. In this regard, the major supply route for raw ivory was temporarily disrupted due to the cessation of Air Afrique's regional operations in the face of bankruptcy. Still, to some degree, the ivory retail outlets and workshops of Senegal continue to be supplied with ivory of illegal origin, mostly coming from the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic. Owing to a relaxation in law enforcement effort and corruption, ivory which continues to arrive in the country possibly finds fewer impediments to importation than what was the case some three years ago.

### *Regulation of trade*

In terms of statutory matters, it was previously reported that "worked ivory is legally sold in Senegal" (Martin and Stiles, 2000). This point seems less clear in the present survey as it was indicated by government officials that, technically, domestic trade in ivory, or any other elephant product, is forbidden. However, because the language in the national legislation is not explicit and remains ambiguous (D. Sow, pers. comm., June 2002; A. Sy, pers. comm., June 2002), the reality on the ground continues to allow an unfettered ivory trade to exist. In fact, no legislative, regulatory or enforcement measures have been taken since 1997 by the authorities to control the domestic trade in ivory. While new legislation to support CITES is in the offing, this development is not expected to change the present situation in terms of Senegal's ivory trade.

Another difference between the two studies concerns the degree of control over the import and export of ivory. Martin and Stiles (2000) reported "that the import of raw ivory was more strictly controlled in Senegal than elsewhere in the region", but that "control over the export of worked ivory was more lax, however." The evidence obtained during this survey, however, could not substantiate either claim. To the contrary, there appears to be virtually no control over the import of raw ivory entering the country and, as stated by government agents stationed at the airport, this has been the case for some time.

Reliable informants interviewed during this survey indicated that the situation has actually worsened during the past three years, and that the wildlife authorities in charge are unable to fulfil their duties in this regard. At the entry points of the country, the situation is perhaps worse. At the international airport, the ports and on the roads, Water and Forests agents are prevented by Customs from any access



or control over goods coming into the country. It was reported, however, that Customs has an official responsibility to collaborate with the Administration of Water and Forests (L. Faye, pers. comm., June 2002). More worrying, there were numerous allegations indicating that Customs officials in Senegal abetted the illicit trade in wildlife products, including ivory.

It follows that the current state of law enforcement leaves a lot to be desired. There are no formal inspection procedures or requirements to monitor the flow of ivory within and out of the country. On the management side, however, manpower seems to be sufficient, satisfactorily organised and informed on CITES for effective control and inspection operations. The general observation of key individuals interviewed during this survey is that the authorities in charge are dedicating even less effort to try to correct the situation than they were three years ago. The agents on the ground in charge of CITES enforcement often feel that they do not have the support they need from their administration. They continue to be denied access to key areas at the entry points of the country, and the few inspections made in the retail outlets are generally not carried through because of the intervention of influential politicians, businessmen or religious leaders.

In the final analysis, Senegal's ivory traders are extremely well organized and seem to have a web of protection and support around their activities, which may explain why no major legal or law enforcement actions have been taken by the authorities against them. The craft market of Soumbédioune, the *de facto* headquarters for the Senegalese wildlife traders, seems to provide an ongoing example of their "untouchable" status. Even on the rare occasion when inspections have been conducted in Soumbédioune, they have not resulted in any significant developments or changes.

#### *Compliance with CITES requirements*

From the information collected on the ground and during the interviews with various officials, it appears that Senegal does not comply with the provisions for domestic trade in ivory as stipulated in CITES Resolution Conf. 10.10 (Rev.). In fact, as documented elsewhere in this report, none of the specific measures listed in the Resolution have been introduced by the authorities. There is no specific legislation to address ivory trade issues, and new legislation in the offing, which will revise the *Hunting and Wildlife Protection Act*, does not introduce controls on domestic ivory trade. It is recognized that subsequent implementation measures may follow the promulgation of the new legislation but, for the moment, no measures are in place to provide for registration or licensing of the country's ivory traders, or for tracking illegal ivory trade developments at the retail level. There has also never been a successful initiative to register the stock of raw, semi-worked or worked ivory being held within the country. The wildlife authorities essentially have no record of ivory stocks in Senegal, nor are they engaged in effective enforcement systems for worked ivory. Controls over raw ivory are equally suspect as they alleged on a number of occasions that Customs had been complicit in the illegal importation of ivory into Senegal.

#### *Implementation of ETIS*

Under these conditions, ETIS is poorly implemented in Senegal. National compliance with ETIS seems currently rather remote as an issue of concern at the Directorate of Water and Forests. The CITES Management Authority currently has no record of any seizure or confiscation of any elephant products. Further, apparently no measures have been initiated recently to try to collect such information, if it exists. On the one hand, Water and Forests agents on the ground claim they have never been in a position to facilitate any investigation that could lead to a seizure. If, and when they do occur, Customs do not communicate any information on such seizures, and there are strong suspicions that any ivory seized is subsequently diverted and either sold on the local market or returned to the owners in question. In other cases, political, religious, or financial pressures are exerted on government officials to abandon any potential prosecution and return the seized products to the perpetrators of the infraction.

## DOMESTIC IVORY TRADE IN NIGERIA

*Francis Hurst*

### 1. BACKGROUND

Although an African Elephant range State, Nigeria's elephants mostly exist in small, relict and possibly unviable populations in both forest and savanna habitats that face considerable and ongoing human pressure. The three largest elephant populations are found in Yankari National Park in the centre of the country, and the Madagali/Kopre and the Chad Basin area in the northeast. Using the IUCN African Elephant Database categories for assessing elephant numbers, Nigeria has only 478 animals in the 'Definite' category, with another 340 elephants 'Possible' and a further 300 elephants in the 'Speculative' category (Blanc *et al.*, 2003). In sum, very few elephants remain in Africa's most populous country.

The ivory trade in Nigeria, which traditionally encompassed a range of activities, including hunting, carving and selling, has a history that dates back to before the Colonial era. Well-established cultural traditions and trade routes have served to give ivory an intrinsic aesthetic value within the country's domestic market (Eyo, 1977; Fagg *et al.*, 1963;). Ivory continues to have cultural significance even today, which creates an important domestic demand for ivory and ivory products. For instance, in the inauguration of traditional leaders in the mid-western and eastern States of Nigeria, ivory regalia are an important ceremonial feature (F. Omeni, Ministry of Environment, pers. comm., June 2002). Additionally, for the last three decades, there has been a large and transient expatriate population, which gives rise to a foreign market in which ivory is exported either casually as carved souvenirs and curios, or commercially in both raw and worked forms (Martin and Stiles, 2000).

In the decade prior to the ivory trade ban under CITES, Nigeria reportedly exported 8,551 kg of raw ivory between 1979 and 1988, with 70% of this trade taking place in 1988 (Luxmoore *et al.*, 1989). However, between 1986 and 1989, Nigeria never officially exported any ivory under the CITES ivory export quota control system (Caldwell and Luxmoore, 1990), so it is doubtful that this trade was legally sanctioned. Under the CITES export quota system, notification to the CITES Secretariat was a necessary obligation, and only registered and marked tusks were eligible for trade. Following the CITES-approved international trade ban on commercial shipments of ivory in 1989, the Federal Government reportedly complied with this decision by not issuing any permits for any kind of ivory trade since 1990.

It should be noted that since the CITES ivory trade ban, Nigeria has been subject to four separate regimes and a fifth democratically-elected government that is now in place. Furthermore, there has been massive devaluation of the local currency, the Nigerian Niara (NGN), at black market rates. Currently, the country is facing a host of social and economic problems. Over this same period, there have been three reports documenting the trade in ivory and elephant products in Nigeria (Allaway, 1989; Dublin *et al.*, 1995; Martin and Stiles, 2000). From these three studies, it is apparent that a key feature of the Nigerian ivory trade is its endurance.

In the most recent study, Martin and Stiles (2000) argued that ivory sales in Lagos had "increased in the 1990s, perhaps back to the late 1980s level". In fact, Nigeria was the only country amongst the eight West and Central African countries surveyed to exhibit such a trend (Martin and Stiles, 2000). They further noted the presence of carvers from Guinea, Mali, Gabon and the Democratic Republic of the Congo in Nigeria, as well as native Nigerians themselves in the trade (Martin and Stiles, 2000). The current study is an attempt to update the situation further and track the ivory trade situation in Nigeria some three years later.



Map of Nigeria

Courtesy of The General Libraries, The University of Texas at Austin

## 2. METHODOLOGY

Field research in Nigeria transpired between 15<sup>th</sup>-26<sup>th</sup> June 2002, where a single researcher carried out market surveys and interviewed government officials and NGOs in the cities of Lagos, Abuja, Kaduna and Kano. Nine people were interviewed during the survey, representing a number of government institutions at both the Federal and State levels, and the country's leading conservation NGO. The following individuals were interviewed:

- Mr. Alede Adeleke, Nigerian Conservation Foundation, Conservation Manager;
- Mr. Alhaji M.M. Omar, Ministry of Environment, Co-ordinator, Environmental Conservation (Abuja);
- Mr. M.P.O. Dore, Ministry of Environment, Head of Division Environmental Conservation Department (Abuja);
- Mr. John Mshelbwala, Ministry of Environment, Chief Conservation Officer (Abuja);
- Mr. F. Omeni, Ministry of Environment, Assistant Chief Wildlife Officer in Charge of CITES (Abuja);
- Mr. Alhaji L.O. Suberu, Ministry of Environment (Lagos);
- Mr. O.O. Omotade, Ministry of Environment (Lagos);
- Mr. Alhaji Ali Lawan Yola, Deputy Director of Wildlife, Kano State; and,
- Mr. Malam Bashir Garba Beli, Senior Officer, Wildlife Department, Kano State.

An attempt was made to visit the Customs warehouse at Aminu Kano International Airport but proved unsuccessful. Information regarding the source of the ivory, market trends, and the nationalities of carvers, vendors and buyers was obtained during the course of the survey. Outlets were often visited more than once on the pretext of bargaining in order to confirm original estimates.

## 3. RESULTS

### 3.1. Legislation and policy

#### *Legal framework*

There is no policy document that deals specifically with elephant conservation and the ivory trade in Nigeria. The stated policy of the Federal Ministry of Environment, however, is broadly in line with CITES to which Nigeria became a signatory in 1975. That is, the import and export of ivory and other elephant parts and products is currently illegal (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002). The official status of the domestic trade is somewhat more ambiguous in that while the Ministry considers it to be prohibited, it is broadly recognised that it goes on, and there is considerable uncertainty with respect to State legislation in this area.

In order to fully understand the complicated situation in Nigeria, it is necessary to describe the framework within which policy and legislation operate. Nigeria is a Federal Republic consisting of 36 States and the Federal Capital Territory of Abuja. The Ministry of Environment is now the national authority responsible for CITES implementation in Nigeria. Formerly, the Federal Environmental Protection Agency, which was created out of the Ministry of Agriculture and Natural Resources in 1993, served in this capacity. As such, it was not part of a Ministry, did not have a Minister, and came under the Office of the President. In 1999, in a move to further rationalise and restructure government institutions, the Ministry of Environment absorbed the Federal Environmental Protection Agency. As a result, within the Ministry, the Department of Environmental Conservation now has two divisions: Nature Conservation, and Biodiversity and Species Management. The latter division deals with all CITES issues.

The implementation of Federal policy and legislation within the 36 Nigerian States follows a clear mandate theoretically. Federal legislation is superior to that enacted by the States, but a State can choose to promulgate its own legislation as long as it does not contravene Federal law or the Constitution. If amendments are made to legislation at the Federal level, the States are expected to also amend their own laws to take account of this. In the absence of appropriate State legislation, Federal law should always take precedence, and there are certain areas of jurisdiction that remain the preserve of the Federal authorities. Importantly, these include the international movement of ivory, including any import or export, and the Customs Service as the executing agency.

The key Federal law is the *Endangered Species (Control of International Trade) Decree No. 11* (1985). As the name suggests, it was created in order to enable CITES implementation throughout Nigeria. The Decree applies to those species listed in two accompanying schedules. International trade in Schedule I species are strictly prohibited, whereas Schedule II species can be hunted, traded, imported and exported under licence granted by the Minister (Anon., 1989). The African Elephant was placed in Schedule II of the Decree, and still remains there in spite of subsequent decisions taken under CITES which relegate Nigeria's elephant population to Appendix I of the Convention, a listing that prohibits all international commercial trade.

The *Wild Animals Law* (No. 16 of 1963; as amended 1975) is a State law with similar Schedules to those found in *Decree No. 11*, however, it also covers such topics as protected areas (excluding National Parks which fall under Federal jurisdiction). The *Wild Animals Law* is a much more comprehensive piece of legislation than *Decree No. 11*, and allows the devolution of authority for wildlife to the State level. However, it has only been adopted in a handful of States (mostly in the northeast part of the country), and many States are still lacking their own legislation concerning wildlife outside of the protected areas system. For States that have not adopted the *Wild Animals Law*, *Decree No. 11* remains the legal instrument for regulating wildlife outside of the protected areas system. In such cases, transgressors would be tried in a Federal Court. The *Wild Animals Law* should, therefore, be in accord with *Decree No. 11*, and any subsequent changes to *Decree No. 11* should correspondingly be acknowledged with amendments to the *Wild Animals Law* by the State's Justice Departments in order to remain compatible with Federal law.

Within this structure, domestic trade in elephant products remained legal provided that traders held a Trophy Dealers Licence and a Free Disposal Permit for the item in question (J. Mshelbwala, Ministry of Environment, pers. comm., June 2002). This can only take place in States that have adopted the *Wild Animals Law* (No. 16 of 1963; as amended 1975). In States where this law is not in force, *Decree No. 11* takes precedence and neither a Trophy Dealers Licence nor a Free Disposal Permit can be issued. (An exception to this general rule could transpire under the forestry regulations, but would only apply to elephants killed in Forest Reserves in Nigeria and would not include the issuance of a Trophy Dealers Licence). Thus, legally speaking, trade in ivory and other elephant products should be illegal in these States, however, the reality is that there is considerable confusion regarding the legitimacy of the domestic trade.

This complex legal situation in Nigeria is further complicated by the fact that, following the 1990 CITES ban on commercial international trade in ivory, the African Elephant has continued to remain on Schedule II of *Decree No. 11*. Thus, under CITES, Nigeria's elephant population was listed in Appendix I, but within Nigeria the species remained eligible for international trade considerations. Regardless of this discrepancy, the CITES authorities deemed it sufficient to comply with CITES by simply not issuing any permits or licences for the import, export or domestic trade in ivory or for the hunting of elephants. This prescription has been followed at the Federal level, but it does not appear to have been the case in all States (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002). Legally speaking, with the African Elephant remaining on Schedule II, it is still possible in some States to obtain a Trophy Dealers License or a Free Disposal Permit for the trading of Nigerian ivory resulting from Problem Animal Control operations. Although this involves a very small, almost insignificant, amount of ivory, it does allow a legal avenue for continued domestic trade in certain States.

In reality, however, the vast majority of the ivory traded in Nigeria is done so without any documentation whatsoever. To have fully complied with the 1990 ivory trade ban under CITES, it now seems evident that the Minister should have issued a Legal Notice upgrading the African Elephant to Schedule I and instructing those States using the *Wild Animals Law* to similarly list the species on Schedule I. If that had been the case, even if the *Wild Animals Law* was not duly amended at the State level, in accordance with *Decree No. 11*, the Federal legislation would have taken precedence and the current anomaly would not exist.

For a variety of reasons, the *Endangered Species (Control of International Trade) Decree No. 11* (1985) is currently under review (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002). The Ministry of Environment recognises that there is a need to amend the legislation and is taking steps towards this (M.M. Omar, Ministry of Environment, pers. comm., June 2002). A report

with recommendations is being prepared and revisions to the Decree may be forthcoming. However, this is likely to be a time consuming process and is not expected to be ready for some time.

### *Implementation and enforcement*

While policy provides the broad framework, and legislation codifies and enables the policy through the promulgation of rules and regulations, the final task of enforcement falls to various government agents. Normally, for enforcement of wildlife issues in Nigeria, the lead role is assumed by conservation agencies such as the Ministry of Environment, State Forestry and Wildlife Departments, and National Parks. However, there are other government agencies that should share the burden of these enforcement activities, most notably the Customs Service and the police, both of which are Federal agencies.

There is little doubt that effective law enforcement of domestic trade in ivory is confounded by the state of confusion concerning the application of various Federal and State laws in Nigeria. Even if there are certain legal ambiguities and discrepancies, however, the law regarding the import and export of raw ivory should be quite clear as all international movement of ivory prohibited. Regardless, the large quantities of ivory found on sale in Lagos should be considered sufficient evidence that ivory is illegally entering into Nigeria, and being exported again, on a regular basis.

Part of the responsibility for this situation lies with the Ministry of Environment and its predecessor, the Federal Environmental Protection Agency. Lack of resources and manpower has meant that they have never been able to maintain a sufficient physical presence to deter the trade. Similarly, they have been unable to create awareness amongst Customs and police officials regarding the import, export and sale of protected species of wildlife. CITES is a national obligation and, as such, responsibility for compliance should be shared by all relevant government agencies. This should foster a spirit of inter-ministerial collaboration and political commitment, particularly when it comes to the allocation of resources.

The current situation, however, is derivative of a long-standing lack of collaboration between law enforcement agencies that should, in fact, be partners in combating wildlife crime. In 1992, the Ministry of Agriculture and Natural Resources, then the authority for CITES, was evicted from Nigeria's ports, airports and border stations during a *Ports Reform Exercise* that was intended to streamline the importing and exporting process. Throughout the subsequent transfer of responsibility for CITES implementation to the Federal Environmental Protection Agency and, then again, to the Ministry of Environment, the appropriate officers have never been allowed regular access to these critical entry and exit points for the ivory trade.

With Nigeria's wildlife authorities effectively denied access, the role of law enforcement in the ports should have been taken up, in theory, by the Customs Service. In practice, however, this did not occur (Mr. Alhaji L.O. Suberu, Ministry of Environment, pers. comm., June 2002), but whether this is due to a lack of awareness, a genuine misunderstanding or, worse yet, complicity in the illegal trade by those in charge, is not clear. It is worth noting that three Lagos-based traders, questioned about receipts issued in conjunction with ivory sales, stated that regular customers asked them for receipts that undervalued the ivory goods in question because Customs officers charged them export duty based on the value stated in the receipt. While this is normal in terms of general Customs procedures for legal commodities, the export of ivory should be banned. This evidence clearly indicates that Customs is routinely allowing the export of ivory products out of Nigeria in apparent violation of CITES as other government authorities claim that they are not issuing any CITES export permits for ivory.

Lack of awareness may be one possible explanation for some of the lapses in the implementation of *Decree No. 11* in the ports, airports and border points. It cannot, however, excuse the sale of ivory in the departure lounge of Murtalla Mohammed International Airport in Lagos (Dublin *et al.*, 1995; Martin and Stiles, 2000). The international airport is Federal property belonging to the Federal Aviation Authority and the sale of ivory within its premises demonstrates a complete lack of law enforcement and possibly even complicity in the illicit trade in ivory.



### *Ivory stockpiles*

It was previously reported that Nigeria lacks a central policy concerning the storage and maintenance of ivory stocks in the hands of government authorities (Dublin *et al.*, 1995). Little appears to have changed in the interim. There apparently was an attempt to register ivory stocks held in the country prior to when the CITES trade ban took effect in January 1990, but it appears to have been poorly undertaken by all sectors (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002). In fact, all authorities, at both Federal or State levels, appear to be either unable, or unwilling, to release data on any ivory stocks in their possession. In 1994, it was reported that some 22 ivory tusks or pieces were held by government authorities, most of which was in the ivory store at Yankari National Park (Dublin *et al.*, 1995), where the country's largest population of elephants, some 328 animals, is found (Blanc *et al.*, 2003). However, it was not possible to update any ivory stock information in the course of the current study.

### *Participation in ETIS*

When interviewed about participation in ETIS, authorities at the Ministry of Environment confirmed that they had never submitted any data on elephant product seizures in Nigeria (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002). The expulsion, and later prevention, of any agents associated with the Ministry of Agriculture and Natural Resources, the Federal Environmental Protection Agency, or finally the Ministry of Environment, from entering the import and export zones of Nigeria's ports of entry and exit, was cited as the primary reason why data on elephant products seizures was not available.

Subsequent to the current survey, however, Nigeria submitted data on 20 ivory seizures that had occurred between 1988 and 1991. These data mark the first formal submission to ETIS by officials from the Federal Ministry of Environment. On the other hand, the ETIS data indicate that, since 1989, Nigeria has been implicated as either the source, destination, transit point or country of export for some 398 ivory or other elephant product seizures that have taken place in other countries around the world (Milliken *et al.*, 2002a). In terms of frequency of involvement in illicit trade in ivory, Nigeria ranked higher than any other African country in the ETIS analysis tabled at CITES CoP12 in November 2002 (Milliken *et al.*, 2002a). Consequently, in Decision 12.39 taken at the meeting, Nigeria was one of ten countries specifically subjected to an intersessional process under the direction of the CITES Standing Committee to demonstrate compliance with the requirements for domestic trade in ivory outlined in Resolution Conf. 10.10 (Rev.). Failure to demonstrate compliance by March 2004 could result in the imposition of sanctions, including a possible suspension of all trade in CITES-listed species.

### **3.2. Retail outlets and prices for worked ivory in Nigeria**

The number of retail outlets visited in four different cities in Nigeria and the estimated number of ivory products observed on their premises is summarised in **Tables 1 to 4** below. It was sometimes the case that the same person owned several of the retail outlets and the dynamics of these operations was not always fully understood. In addition to the number of items observed, data were also collected on the number of clearly identifiable tips of tusks found amongst the worked products and raw ivory cut-offs. Obviously, many worked items, such as bangles and small carvings, do not reveal the presence of the tip end of an ivory tusk, so these data are regarded as reflecting the absolute minimum number of tusks represented by the items observed during the course of this survey.



Table 1

Lagos retail outlets and estimated number of items and volume, June 2002

Location	Number of Outlets	Weight of Ivory (kg)	Number of Items	Number of tips	Other Elephant Products
Lekki (= Ilasan Market)	15	1,200	3,600	332	10 Femurs Hair 1 kg
Ikoyi Hotel	3	30	50	12	-
Eko Meridian Hotel	5	470	730	62	Hair 500 g
Federal Palace Hotel	4	80	100	30	2 Femurs
Murtala Mohamed International Airport	3	110	110	81	-
Sandgrouse Market*	1	100	50	20	-
<b>Total</b>	<b>31</b>	<b>1,990</b>	<b>4,640</b>	<b>537</b>	-

\* This is in fact a workshop selling wholesale raw ivory and employing carvers. The owner also owns two of the outlets at Lekki Market.

Table 2

Abuja retail outlets and estimated number of items and volume, June 2002

Location	Number of Outlets	Weight of Ivory kg	Number of Items	Number of Tips	Other Elephant Products
Nicon Noga Hotel (Hilton)	2	18	28	9	Femurs 2
<b>Total</b>	<b>2</b>	<b>18</b>	<b>28</b>	<b>9</b>	

Table 3

Kaduna retail outlets and estimated number of items and volume, June 2002

Location	Number of Outlets	Weight of Ivory kg	Number of Items	Number of Tips	Other Elephant Products
Hamdala Hotel	3	60	120	12	10 Femurs Hair 500 g
<b>Total</b>	<b>3</b>	<b>60</b>	<b>120</b>	<b>12</b>	

Table 4

Kano retail outlets and estimated number of items and volume, June 2002

Location	Number of Outlets	Weight of Ivory kg	Number of Items	Number of Tips	Other Elephant Products
Central Hotel	2	30	150	22	2 Femurs
Kurmi Market	4	20	50	12	3 Femurs
<b>Total</b>	<b>6</b>	<b>50</b>	<b>200</b>	<b>34</b>	

Some 42 ivory outlets were found in the four cities visited, with three quarters of them found in Lagos, which is certainly the centre of Nigeria's ivory industry. The Lekki (or Ilasan) Market in Lagos had the greatest number of ivory vendors and over 60% by volume of the ivory products found in Nigeria. Many retail outlets in this market had large quantities of ivory products, but very few wood carvings, suggesting that these shops were primarily ivory-based enterprises. Interestingly, and in sharp contrast, it was also found that a number of shops selling arts, crafts and luxury goods in Nigeria have instituted

a 'no ivory policy' based on their own personal convictions (Mrs. A. Oni-Okpaku-Ternstadt, pers. comm., 2002), however, there is no official backing for such a stand.

Apart from the four cities visited in the course of this survey, Benin City, Onitsha and Port Harcourt were also identified as playing significant roles in the ivory trade. These locations were not visited during this survey due to time constraints, but some sources suggest that there is significant trading activity occurring (J. Mshelbwala and F. Omeni, Ministry of Environment, pers. comm., June 2002), possibly at levels similar to the trade in Lagos, according to local informants. One informant speculated that the trade in Port Harcourt was increasing due to the oil industry, and another suggested that international flights to and from Port Harcourt stood behind an increasing volume of ivory trade in that city (J. Mshelbwala, Ministry of Environment, pers. comm., June 2002). The principal researcher was unable to visit these locations and verify any of these allegations personally.

The prices of ivory at the retail level are highly variable and the final price usually depends upon the bargaining experience of the prospective buyer. That said, the starting prices for most items remained fairly consistent between most of the retail outlets visited. The USD rates given in this study reflect conversion at black market rates, as these were the calculations used by the traders themselves, who in many instances were changing money as well as selling ivory. For instance, two mounted, polished tusks, weighing an estimated 4 kg, were priced initially at NGN75,000 (USD556)<sup>4</sup> in nine separate outlets. This would equate to USD139/kg, but negotiation reduced the total price by 40% to NGN45,000 (USD 333), leaving a retail price of some USD83/kg. Given the average wholesale price of raw ivory of USD30/kg, it can be surmised that a margin of some 280% has been realised over this value, including a mark up for the polishing and mounting of the tusks, a margin for the retailer and, perhaps, even some margin for turnover time.

Carved ivory was considerably more expensive for larger items. For instance, a medium-sized rhino figure, weighing an estimated 400 g, was retailing at NGN15,000 (USD111), which negotiation might reduce to NGN9,000 (USD67). This gives an estimated price of USD167/kg for carved ivory. It would not be unreasonable to expect this sort of mark up between the retail and wholesale. With a high crime rate, there must be considerable risk in a city like Lagos in holding on to such valuable items for any period of time. Similarly, the difference in price per kilogramme for carved ivory also reflects wastage that results from carving. These prices, however, are estimates, there is considerable variance in average prices, and real intent to buy might have reduced prices further, thus, these figures must be treated with caution.

The ethnicity of individuals involved in the various aspects of carving, selling and buying ivory is an important factor in understanding the nature and dynamics of the trade in Nigeria. During the course of this survey, three distinct groups of sellers were identified in Lagos. Traders from the north of Nigeria who spoke Hausa were predominant at the Federal Palace, Ikoyi Hotel and the Echo Meridian and Murtala Mohammed International Airport outlets, and at five of the smaller outlets at the Lekki Market. A second distinct group of traders were linked to the city of Onitsha and apparently are part of an integrated ivory industry involving the import, carving, retail and export of various ivory products. This group is closely associated with the owner of the Sandgrouse Market workshop and the two largest outlets at the Lekki market, which create important retail bases in Lagos for products originating from Onitsha. The third group of traders encountered were from Mali, who owned at least four of the outlets at Lekki Market, and indicated that they had an ivory workshop in the Obalende area of Lagos. Elsewhere in the country, it was found that the retail ivory outlets found in Kaduna and Kano were entirely run by Hausa traders. The origin of the two traders selling ivory in Abuja, however, was not clear.

The market at Lekki is a major centre for art, crafts and other items such as compact discs, imported liquor, beer and soft drinks. Both expatriates and Nigerians regularly visit it for commodities, crafts and curios. When questioned, traders usually replied that all nationalities were buying ivory, but the most frequently mentioned nationalities were American, Chinese, Italian, Japanese and Korean. This may reflect the prejudices or perceptions of the individual traders, for instance, and terms like 'Arabs' or 'Indians' were frequently used. During a visit to Sandgrouse Market, an individual, who confirmed that he was the owner of the Sandgrouse Market workshop, stated that he had in the past arranged for

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<sup>4</sup> Exchange rate used here and throughout the text: NGN135 = USD1.00 rounded off to the nearest dollar. NGN = Nigerian Naira and USD = United States Dollars

‘containers’ of ivory to be shipped from Nigeria. When asked who was buying such large amounts he indicated Chinese and Lebanese buyers.

It is not possible to estimate the turnover of ivory within the country, but anecdotal evidence would suggest that it is considerable. For example, the fact that there are dedicated displays of ivory at Murtala Mohammed International Airport in Lagos, the country’s major point of entry and exit, as well as the sophistication and number of people involved at the retail level, indicates that traders are willing to invest in the trade.

Vendors felt it was not difficult to move ivory out of the country. As mentioned, some would issue undervalued sales receipts to clients who expected to pay Customs duty at the airport. The suggestion that the researcher could use contacts with diplomatic staff to export larger items such as whole tusks was mentioned on 11 different occasions, a frequency that can not be ignored or dismissed. Finally, as a general observation, few traders have little, if any, specific knowledge of CITES, and they were generally unaware of international policy developments with respect to elephants and ivory trade.

### 3.3. Ivory carving and manufacturing in Nigeria

Consisting of two separate rooms, only one workshop in the Sandgrouse Market in Lagos was visited during the course of this study (see **Table 5**). At the time, ivory was brought from a third location for viewing. Whether this workshop was the same one identified at this location in the Martin and Stiles (2000) report is not entirely clear. Although there were five carvers present during the visit, very little ivory was actually being worked, however, there was apparently an abundance of ivory in the workshop at the time. It should also be noted that there was no evidence of any wood carving at this particular workshop. It was reported that the head office of the Sandgrouse Market ivory workshop was located in Onitsha. These were the only carvers observed during this survey.

Other workshops are believed to be in and around Lagos. Several of the traders interviewed at the Lekki Market stated that Guinean carvers were employed and produced the best quality carvings, although during the visit to the Sandgrouse Market workshop the nationality of the carvers there could not be confirmed. The Malian group of traders, with at least four outlets in Lekki Market, indicated that they had an ivory workshop in the Obalende area of Lagos, although the address given was in Lagos Island and not Obalende (see **Table 5**). Due to time constraints, it was not possible to visit this location during the study, however, the researcher was reliably informed of the existence of several retail outlets selling ivory in this area along Odo Street which could be linked with such a workshop.

**Table 5**

**Ivory Carving Workshops, June 2002**

Name	Location	No. of Carvers	No. of Tips	Weight of Ivory (estimate)
Sandgrouse Market	Lagos	5	20	100
Lagos Island	Lagos	?	?	?

The most sophisticated and best quality carving appears to originate in Onitsha and Benin City, two cities not visited in this study. That said, overall, the quality of carving appears to have declined since 1995, and is generally below the standard observed in Abidjan during this study. Particular carving styles have developed in Nigeria, however, such as ‘Festival of African Culture’ masks, copies of Benin bronzes, and the *Carter Bridge* (named after a famous Nigerian bridge), which consists of a carved tusk depicting animals and people along a central spine. Other common items observed were various kinds of fruits and animals, including rhinoceros, hippopotamus, lion and warthog figures, walking sticks, chopsticks, cigarette holders and name seal blocks. An interesting development observed during this survey was the replication of European figures, for example, two carved mute swans were displayed in a stall in Lagos that resembled the porcelain figures sometimes found in European gift shops.

In past studies, ivory workshops have been recorded in Kano (Dublin *et al.*, 1995), Lagos (Allaway, 1989; Dublin *et al.*, 1995; Martin and Stiles, 2000), and Onitsha and Benin City (Dublin *et al.*, 1995), and styles of carving are reportedly distinctive (Dublin *et al.*, 1995). Benin City has historically been an important centre for ivory carving (Eisenhofer, 1994). Although Benin City was not visited during this study, almost every trader interviewed during this study mentioned Onitsha and Benin City as sources of carved ivory. Onitsha is an extremely important trading centre in Nigeria, and it is not surprising that ivory is reportedly a trade item supporting a local carving industry. When questioned, traders were often very particular about the origin of their worked products, and pieces from Benin City and Onitsha were of a superior quality to those that had apparently been carved in Lagos. On the other hand, there no longer appear to be any active ivory carving workshops in Kano.

### 3.4. Sources and prices for raw ivory

Past studies have all indicated that the majority of ivory entering the Nigerian market is imported from other West and Central African countries (Allaway, 1989; Dublin *et al.*, 1995; Martin and Stiles, 2000). In the current study, sources of ivory have remained the same as those identified in earlier studies with the most ivory being imported from the Democratic Republic of the Congo, Central African Republic, Congo (Brazzaville), Gabon and Cameroon. Chad is also sometimes mentioned as a source of ivory, but it could be mistakenly identified as a source for ivory entering Nigeria because it is on an important trade route from the Central African Republic and Cameroon through Chad to Maiduguri. The supply from Central Africa is augmented by a very limited quantity of ivory entering the market from elephants killed legally and illegally within Nigeria (J. Mshelbwela, Ministry of Environment, pers. comm., June 2002).

An important point to note here is that, apart from ivory, there is a large volume of other craft items from Central Africa on the Nigerian market, such as raffia cloth, malachite and wood carvings, suggesting strong trading links with the Democratic Republic of the Congo, Congo (Brazzaville) and Gabon. In addition, a number of other wildlife products were found for sale. Most notable amongst the items seen were: a Black Rhinoceros *Diceros bicornis* horn (a photograph was displayed of both the front and rear horn, when questioned the shop assistant said the front had been sold but the rear horn was still available); two Okapi *Okapia johnstoni* skins; and, 12 well-prepared Leopard *Panthera pardus* skins (it is unlikely that these would have originated in Nigeria due to the number of skins and their well preserved condition). The presence of these items again underscores the strong trading links for wildlife products with countries in Central Africa.

In terms of raw ivory prices, Allaway (1989) gave a price of USD14–29/kg in Lagos. Dublin *et al.* (1995) stated that the price was USD23–29/kg in Maiduguri, however, it would probably have been higher in Lagos at the time. Martin and Stiles (2000) stated that, in 1998, the price of raw ivory in Lagos had been USD30/kg, but had subsequently risen to USD46–50/kg in 1999. None of these prices were adjusted for inflation, and the significant increase in price in 1999 was attributed to either an increase in demand or a decrease in supply (Martin and Stiles, 2000).

This study found that raw ivory sold at the wholesale level was priced in two categories. According to various credible sources, small pieces of raw ivory and ivory tusks with a long root cavity, are less valuable than larger tusks or tusks with short root cavities. Small tusks are sold for between NGN3,200–3,800/kg (USD24–28/kg), while the better quality larger tusks are sold for NGN4,200–4,800/kg (USD31–36/kg).

While it is not possible to demonstrate accurate trends in the ivory market in Nigeria, it does appear that the unadjusted price of raw ivory in USD terms has remained relatively constant over the last decade. At the time of this study, there was no indication from any of the traders or retailers that they were concerned about ivory supply or prices as a result of any developments in CITES.

It would be inappropriate to attempt to put a value on the ivory trade in Nigeria based on the available evidence. It is, however, useful to consider some monetary aspects of the trade in light of the findings of this survey. Given the costs of transport and ‘safe’ passage across several international borders, the average wholesale price of raw ivory of USD30/kg gives some indication of the price of ivory at its origin. As noted previously, data concerning the price of mounted ivory tusks indicates that there is nearly a three-fold (280%) increase in price between the wholesale and retail levels within Nigeria. If

one were to consider that a similar mark-up occurs between source and the wholesale trade in Nigeria, this assumption would indicate an average price of around USD10/kg in the source countries of Central Africa. Such extrapolation should be used cautiously, however, as there are many assumptions involved which can not be adequately measured.

#### 4. DISCUSSION

##### *Status of the ivory market*

A minimum of 31 retail outlets were identified in Lagos, carrying an estimated 1,990 kg of worked and raw ivory. Six other outlets were found in Kano, displaying 50 kg of worked and raw ivory, three in Kaduna, with 60 kg of worked and raw ivory, and two in Abuja, displaying 18 kg of worked and raw ivory. Altogether, an estimated total of 2,118 kg of ivory was observed in Nigeria during this study.

These data can be viewed against previous assessments of Nigeria's ivory trade. Allaway (1989) identified 34 ivory outlets in Lagos and estimated 1,081.5 kg of ivory for sale. Dublin *et al.* (1995) estimated 500-700 kg of ivory for sale in Lagos, but did not give the number of outlets visited, while Martin and Stiles (2000) counted 40 outlets selling ivory and estimated that there was 1,742 kg on display in 1999. Martin and Stiles (2000) had suggested that, in comparison with the findings reported in Dublin *et al.* (1995), there had been an increase in the number of retail outlets and the volume of worked ivory on sale in Lagos in 1999. This observation is certainly true, but it needs to be placed in the context of the national crisis brought on by an annulled election process in Nigeria in June 1994 when the earlier survey was carried out. The lower volume of ivory noted in Lagos by Dublin *et al.* (1995) was certainly influenced by the economic and political chaos that was unfolding at the time.

The more important finding, however, concerns a comparison of the Martin and Stiles (2000) results with the current study. While their study found more retail outlets selling ivory in Lagos than the current survey, the estimated volume of ivory in Nigeria's commercial capital in June 2002 appears to have increased by over 10% from the earlier report. Whether this actually represents an upward trend, or is simply an artefact of the two studies, remains to be seen. One is able to conclude without much hesitation, however, that the Lagos ivory market remains stable and is as at least as robust as it was when surveyed by Martin and Stiles (2000). It is worth remembering that these observers found Lagos (together with Abidjan) to be the most active ivory markets in Africa (Martin and Stiles, 2000). The evidence from this study places Lagos as the paramount ivory market in West Africa.

##### *Ivory carving and manufacturing*

Only one ivory carving workshop, where five carvers were observed, was visited during this study. Another workshop was allegedly operating from an Obalende or Lagos Island location, but it was not possible to visit during the study due to a lack of time. Moreover, numerous informants suggested that active ivory carving operations continued to take place in various other parts of Nigeria, including Onitsha, Benin City and possibly Port Harcourt. Unfortunately, these locations were also not visited for the same reason. Ivory carving in the city of Kano, however, was found to have ceased.

Martin and Stiles (2000) identified six ivory workshops and observed 33 carvers in Lagos, and suggested that there were at least ten other carvers in the city. The results from this study would appear to suggest that there has been a downturn in manufacturing, but such a conclusion would be premature. The current lack of data on ivory carving workshops and carvers is more a function of time constraints than anything else. Given that the collective weight of the ivory products observed in 2002 is greater than that found in 1999, with the exception of the situation in Kano, there is little reason to believe that ivory manufacturing is in decline in Nigeria.

##### *Ivory consumers*

As identified by local vendors, the principal buyers of ivory were Americans, Chinese, Italians, Japanese and Koreans. Some informants indicated that diplomatic staff were amongst their customers and that staff at some missions could be engaged to assist in moving large ivory items out of the country if necessary. It was also alleged that, on occasion, Chinese and Lebanese buyers were engaged in the export of 'containers' of ivory presumably for re-sale purposes abroad. The identification of Nigeria as a source of ivory in various large-scale seizures which have occurred in China and Taiwan



lends credence to this allegation. For example, data from Taiwan has identified Nigeria as either the country of export or country of origin for three huge illicit consignments of ivory totalling 1,031 kg in 1994, 1,127 kg in 1996 and 1,454 kg in 1998. Since then, China has also identified Nigeria as the exporter of a seized consignment of ivory totalling 2,614 kg of ivory in 2001, while authorities in the Netherlands seized another shipment of 518 kg of ivory en route from Nigeria to China the same year. These cases represent some of the largest ivory seizures in the ETIS records.

### *The price of ivory*

In terms of internal trade dynamics, the unadjusted price of raw ivory in USD terms in Nigeria seems remarkable in that it appears to be one of the few international trade commodities that has remained largely fixed in price since the 1990 ivory trade ban under CITES. Allaway (1989) suggested that the price of raw ivory was between USD14–29/kg at the time of the CITES decision, while Dublin *et al.* (1995) quoted a price of USD23–26/kg some five years later. These observations were followed by Martin and Stiles (2000) who suggested that the price had “fallen out of equilibrium due to either a rapid decrease in supply or an increase in demand” and stated that the price of raw ivory was USD50/kg, while “a year ago the price was USD 30/kg”. In the current survey, poor quality ivory sold for between NGN3,200–3,800/kg (USD24–28/kg), while the better quality larger tusks were priced at NGN4,200–4,800/kg (USD31–36/kg). Overall, an average price of NGN4,000/kg (USD30/kg) was recognised, suggesting a return to 1998 price levels. This seems a rather remarkable development when viewed in 2002 USD terms using the Gross Domestic Product (GDP) Deflator inflation index. The adjusted data show a 50% reduction in price over what was observed by Martin and Stiles (2000) in 1999. Such a trend is contrary to the increasing price for raw ivory that characterises the ivory markets in Côte d’Ivoire and Senegal.

Whether the increase in the price of ivory recorded by Martin and Stiles (2000) during their 1999 study was real or an artefact of their survey is an important issue. If it were real, it might suggest the temporary disruption of a major source of ivory, possibly the Democratic Republic of the Congo. At the time, craftsmen suggested that the price increase was due to a reduction in supply from the Democratic Republic of the Congo because of the continuing civil war there (Martin and Stiles, 2000). In the current study, where the price of raw ivory appears to have dropped back to former levels, this could reflect the resumption of a steady supply of raw ivory from the Democratic Republic of the Congo or other alternative sources. Currently, there is no evidence of a lack of ivory on the Nigerian market.

### *Sources of ivory and trade routes*

As found to be the case in previous studies, most of the ivory found in Nigeria has been imported from Central African countries, with the Democratic Republic of the Congo, Central African Republic, Congo (Brazzaville), Gabon and Cameroon the most frequently mentioned sources. There may be some slight shifts in terms of the relative roles these countries play in the trade. For example, Congo (Brazzaville) was not identified as a source country at all, and Gabon was only rarely mentioned in the Martin and Stiles (2000) report. In the present study, Chad was also sometimes mentioned as a source of ivory, but it is important to remember that this country lies along one of the most important trade routes starting in the Central African Republic, passing through Cameroon, and entering Nigeria from Chad in the far northeast of the country at Maiduguri, a city long identified as a key hub in the illicit trade in ivory (Allaway, 1989). As Chad is the last country in which ivory passes through before reaching Nigeria, it is more likely to be a transit point rather than a source of ivory in and of itself. Martin and Stiles (2000) also noted a more coastal route from Cameroon, through Calabar to Onitsha and Lagos. This route was not mentioned during the current study but that is not to say that it is no longer currently active. As Onitsha was repeatedly identified as an important source of many of the ivory carvings viewed in Lagos, and this city was unfortunately not visited during this survey, there is little reason to suspect that this trade route is no longer important.



**African Forest Elephant killed by poachers being inspected by game guards. Dzanga-Ndoki National Park, Central African Republic**

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Finally, there is limited evidence to suggest that Nigeria's remaining populations of elephants are also at risk to meet internal demands with local sources of ivory. Though rare, government officials noted that opportunistic poaching probably results in a very limited quantity of ivory tusks reaching local markets.

In terms of the export of worked ivory products, Lagos is certainly the major exit point, but some informants also suggested a growing export trade from Port Harcourt, though this could not be confirmed. It was commonly acknowledged that Customs authorities do little to inhibit the trade, and certain staff at unnamed diplomatic missions in the country sometimes play a role in facilitating illegal exports. In this regard, on eleven separate occasions, vendors suggested that they could arrange for diplomatic staff to export large items of ivory such as whole tusks.

### *Regulation of trade*

As in the past, Nigeria's complicated federal system of government continues to give rise to various ambiguities and anomalies in terms of the application of the country's wildlife trade legislation, and issues of legal precedence are confused throughout the country. While the *Endangered Species (Control of International Trade) Decree No. 11* (1985) was ostensibly established as a basis for CITES implementation throughout the country, failure to amend the schedules with respect to the level of protection given to Africa Elephants, and ongoing confusion in terms of the applicability of *Decree No. 11* at the State level, essentially preclude effective regulation of the ivory trade in Nigeria. Two previous studies (Dublin *et al.*, 1995; Martin and Stiles, 2000), as well as the present study, all indicate that Nigeria fails to comply with CITES in this regard, and the primary cause is the almost complete lack of law enforcement and implementation of the country's wildlife legislation. This fact was also recognised in the ETIS analysis where Nigeria registered the lowest law enforcement effort score possible. The fact that *Decree No. 11* is currently under review is a positive development, but whether needed revisions and amendments will transpire in a timely manner remains to be seen.

It is also positive to note that the authority for CITES has undergone restructuring in recent years and is now contained within a single Ministry. This represents an encouraging development, and there appears to be a strong resolve within the Ministry of Environment to tackle the issue of ivory and the trade in wildlife *per se*. The commitment of the government to address these issues represents an opportunity for engagement with the authorities to build capacity and develop an effective framework and system that can tackle the issues of trade and biodiversity conservation. However, this may require some degree of international assistance, the co-operation of other government agencies and, above all, a high-level commitment from the government. For the moment, the trade in ivory in Nigeria is expected to remain problematic in the immediate future.

The authority charged with responsibilities for policing the ivory trade, the Ministry of Environment, remains under-funded and is legally unable to discharge its duties because it is excluded from operating in the ports, airports and border crossings of the country. This latter development, a long-standing issue since 1992, supports the routine illicit movement of ivory in and out of Nigeria, and there are persistent allegations that Customs authorities are complicit in this trade. This worrying state of affairs at the ports of entry and exit, however, is no excuse for the general lack of enforcement on the ground. The fact that ivory is openly sold at numerous retail outlets and carving workshops operate throughout the country, including in the departure lounge areas of the international airport in Lagos, indicates a very lax situation.

### *Compliance with CITES requirements*

In force since before the 1990 CITES ban came into effect, *Decree No. 11* has been cited on numerous occasions as a competent legal basis for meeting Nigeria's obligations under CITES. However, as documented in this report (and others in the past), there is considerable confusion about the exact status of the African Elephant under this Decree and ambiguity concerning its implementation at the State level. In reality, implementation of *Decree No. 11* proceeds in an extremely inefficient manner, and the institutional framework within which the law must operate remains very weak. Because enforcement of the existing domestic legislation controlling ivory trade has been largely ignored, the conditions of Resolution Conf. 10.10 (Rev.) are not supported or implemented in any credible manner. There is no evidence to suggest that ivory manufacturers and vendors have been licensed or registered, or that they

are subjected to any recording or inspection procedures so that the flow of ivory, whether raw or worked, can be monitored in a credible manner. Enforcement measures remain non-existent for the most part. In sum, while Federal authorities express the view that all trade in ivory is illegal in Nigeria, the trade continues unfettered throughout the country, and there has been little, if any, attention on this issue. Nigeria's ivory trade very decidedly rests upon the illegal importation of raw ivory from sources external to Nigeria, and results in a flow of worked ivory products out of Nigeria in contravention of CITES and domestic legislation.

The identification of Nigeria as a large-scale unregulated market for illicit ivory of global importance in the ETIS analysis presented to CITES CoP12 resulted in its inclusion in Decision 12.39. Nigeria is currently part of an intersessional review process under the auspices of the CITES Standing Committee and needs to demonstrate compliance with Resolution Conf. 10.10 (Rev.) by March 2004. If not, a decision to suspend trade in CITES-listed species to and from Nigeria may be taken by the CITES Standing Committee.

### *Implementation of ETIS*

At the time this survey was carried out, Nigeria had never submitted any data on elephant product seizures within the country to ETIS. This state of affairs stood in sharp contrast to the fact that Nigeria was reportedly implicated in nearly 400 ivory seizures that had occurred elsewhere in the world between 1989 and 2002. Government wildlife officials reported that because their departments had effectively been expelled from any access to the country's ports of entry and exit since 1992, they had no information on elephant product seizures which might have happened over the intervening decade. The lack of collaboration with Customs and the police were cited as a major impediment to the effective implementation of ETIS in Nigeria. Subsequent to this survey, however, the Nigerian government tabled 20 ivory seizure cases with ETIS which transpired over the period 1988 through 1991. This represented improvement in terms of participation in ETIS, but the data that was tabled all stems from the period prior to the point that the wildlife authorities were barred from Nigeria's ports, airports and border posts. It remains to be seen if any data on seizures which occurred after 1992 will be catalogued and reported to ETIS in the future.

## CONCLUSIONS AND RECOMMENDATIONS

*Tom Milliken*

During the course of this survey, an estimated total of 4,025 kg of mostly worked ivory products were found for sale in nine cities visited in three West African countries in mid-2002. But what does this ‘snapshot’ in time represent in terms of elephants? If this estimate is converted to raw ivory equivalent and then into the number of tusks using the formula contained in the ETIS analysis for CITES CoP12 (Milliken *et al.*, 2002b), the total weight converts to 5,233 kg of raw ivory and represents 1,434 tusks. Assuming that each elephant yields 1.88 tusks (Parker and Martin, 1982), the ivory products viewed in Côte d’Ivoire, Senegal and Nigeria would represent 763 elephants.

This estimate, of course, is an absolute minimum figure as it is based on data from a static point in time and only in a few locations. Inevitably, there were unobserved stocks of ivory in all of the countries visited. Moreover, the annual turnover engendered from the ongoing buying and selling and processing of ivory in each of these countries remains to be assessed. Does the annual turnover rate double in the course of a year? Or is the rate of sale even greater? Unfortunately, no one knows the answer to such questions, and it is not possible to make an accurate estimate at this time.

Regardless, without any further extrapolation, the scale of trade represented by the results of this study are very worrying. Using the IUCN/SSC African Elephant Database categories for assessing elephant population data, collectively, the number of African Elephants in the ‘definite’ category for these three countries totals only 543 animals. Another 1,714 elephants are listed as ‘Possible’ and ‘Speculative’, data categories that are far less reliable in terms of precision. When viewed against these numbers, it is easy to conclude that the unregulated ivory markets of Côte d’Ivoire, Senegal and Nigeria could conceivably consume their entire elephant populations in a relatively short period of time.

But in fact, the current impact of this trade is most directly felt in Central African countries hundreds, if not thousands, of kilometres away. The results of this survey largely confirms the findings of previous studies and, indeed, probably the history of West Africa’s ivory trade since the beginning of the 20<sup>th</sup> century. Domestic trade in ivory in Côte d’Ivoire, Senegal and Nigeria is intrinsically linked with Central Africa’s population of elephants. West Africa directly benefits from the illegal killing of elephants and the illicit trade in ivory from the African Continent’s most troubled region in terms of elephant conservation. Recent field reports from various countries in Central Africa all seem to point towards a possible increase in the poaching of elephants in the region (H. Dublin, *in litt.* to T. Milliken, TRAFFIC East/Southern Africa, November 2003), and there can be little doubt that West Africa’s domestic ivory markets are direct beneficiaries of this ongoing slaughter.

Viewing the ‘snapshot’ results of this study with those of Martin and Stiles (2000) and earlier studies, these ivory markets characteristically show a strong element of ebb and flow in terms of their status at various points in time, but overall they exhibit a strong resilience. Responses to major events, such as serious political instability, or the disruption of a major source of supply, results in a temporary downturn in the volume of ivory products found on the local market. On the other hand, these markets seem to ‘bounce back’ with any subsequent return to normality. The ‘snapshot’ nature of recent attempts to assess the ivory trades in these markets simply documents this phenomenon through recent time.

Another feature of the trade is the inter-linkage of market dynamics between countries, especially within Francophone Africa. This study produced clear evidence to demonstrate a strong relationship between the ivory trades in Côte d’Ivoire and Senegal, and this is probably the case elsewhere. These relationships are supportive and are an important factor in building a regional resilience for trade in ivory. Currently, political chaos in Côte d’Ivoire has led to a downturn in the local ivory industry. With fewer local buyers, one response is to export more worked ivory products to other countries. In this regard, this report has documented that over a quarter of the worked ivory products in Senegal have come from Côte d’Ivoire.

Finally, there is some evidence to suggest ‘inspired moments’ on the part of government authorities in terms of exerting control over the ivory trade situation in each of the three countries surveyed. In all cases, however, improvements in legislation, regulation and enforcement have not been sustained, and momentary efforts to ‘clean up’ the markets and gain effective legal control on the part of the

government authorities have fallen flat with the passage of time. In July 1999, Senegal was seen to be making an attempt to implement CITES and prevent illegal trade in ivory and other wildlife products (Martin and Stiles, 2000). Three years later, the results of this study clearly show a return to the status quo, with no evidence of effective law enforcement at any level in Senegal. Likewise, Côte d'Ivoire made great strides with new legislation in 1997 and a national registration effort the following year, only to see things come to a standstill and illicit trade in ivory return with vigour. And finally, in Nigeria, the situation only seems to grow worse with higher volumes of ivory identified in this study than was the case in 1999.

The inability of the wildlife authorities in each of these countries to press forward with an agenda to control ivory trade effectively can be attributed to a combination of factors. Problems are often generic and include political instability, widespread corruption, heavy administrative workloads, insufficient budget allocations for the wildlife sector in general and law enforcement in particular, and insufficient political will to address problems and comply with international regulations. In the present situation, it seems that only improved awareness and commitment at the highest level of government in each of these States will lead to the necessary change in the system.

The domestic ivory trades of Côte d'Ivoire, Senegal and Nigeria all remain unregulated and all subvert international trade controls under CITES. Only through international pressure is change likely to be forthcoming. The following recommendations need to be implemented in each of the countries surveyed in this report.

## CÔTE D'IVOIRE

The following actions are recommended to improve ivory trade controls in Côte d'Ivoire.

### *Improving policy, legislation and regulatory measures*

There is a need to strengthen *Decree No. 97-130* (1997) by addressing certain loopholes or clarifying specific issues that are now ambiguously interpreted. In this regard:

- the issue of ivory stock management responsibilities needs to be explicitly outlined through the designation of a specific government authority as having jurisdiction over all State-owned stocks of ivory, including those held or seized by other government bodies;
- procedures and timeframes for handing over currently-held and future stocks of ivory, including seizures, needs to be specified;
- responsibilities and procedures for the storage of all State-held ivory stocks need official legal clarification;
- the requirement to register all stocks of ivory with the government needs to be strengthened so that those who fail to register are subjected to the forfeiture of their stocks;
- for those commercial dealers who have registered stocks, obligations for maintaining stock inventories, including regular reporting requirements on their status to designated government authorities, needs to be established; and,
- a formal date needs to be legally established by which time all commercial sales of ivory, including those at the retail level, must cease in order to prevent an indefinite and ongoing 'clearing out' period.

### *Addressing implementation and enforcement deficiencies*

The general lack of commitment towards the implementation and enforcement of wildlife legislation in Côte d'Ivoire must be addressed. In this regard:

- forceful public expressions of political will and commitment need to come from the highest levels of government, particularly the Ministers of the Ministry of Water and Forests and the line Ministries for Customs and police authorities; and,
- the long-standing lack of collaboration between Customs and police on the one hand, and law enforcement agents aligned to the Ministry of Water of Forests on the other, must be addressed as a matter of urgency.

It is unacceptable that official government wildlife authorities policing trade in CITES-listed species are denied access to Côte d'Ivoire's ports of entry and exit. In this regard:

- all jurisdictional impediments that prevent Ministry of Water and Forests agents from undertaking effective law enforcement actions at the ports of entry and exit should be removed with immediate effect;
- a formal protocol between port authorities, Customs, police and law enforcement agents of the Ministry of Water and Forests needs to be put in place; and,
- such a protocol should establish a basis for effective future operations, including a code of conduct, collaborative procedures, information sharing, access rights and obligations, and other related issues.

Continuing allegations concerning the complicity and collusion of Customs authorities in the illicit trade in ivory in Côte d'Ivoire are cause for great concern and must be addressed in a serious manner. In this regard:

- government should mandate an independent Commission of Inquiry and launch a formal investigation;
- issues to be investigated should include whether or not Customs officials have made interventions that facilitate the flow of illegal shipments of ivory and ivory traders through Customs control channels at the ports of entry into the country, and whether or not Customs officials have disposed of seized ivory stocks and products into the hands of local traders; and,
- the results of the investigation should become a matter of public record and any guilty parties dealt with in a legally appropriate manner, including suspension or termination of employment.

Continuing allegations concerning the involvement of diplomatic missions or personnel in the illicit movement of ivory out of Côte d'Ivoire is an important issue that should be investigated. In this regard:

- the Ministry of Environment should conduct a public awareness effort to sensitise the diplomatic community concerning any involvement in the illegal movement of ivory or ivory products in or out of the country; and,
- any future case involving complicity of a diplomatic mission or any of its personnel should not be tolerated.

Because the most frequently mentioned means for conveying illicit shipments of ivory into Côte d'Ivoire concern air connections to Abidjan, there is an urgent need to improve law enforcement efforts and procedures at Felix Houphouet Boigny International Airport. In this regard:

- law enforcement bodies need to target for special attention all flights coming into the country that originate in, or transit through, the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic;
- methods to effectively screen incoming passengers and cargo for ivory and other elephant products need to be developed and implemented; and,
- the display and sale of all ivory products within the premises of the airport should be prohibited with immediate effect.

### *Enhancing ivory stock management*

Although Côte d'Ivoire took promising steps in 1998 to register all stocks of ivory in the country, inherent deficiencies in this exercise and the total lack of follow-up action are problems that need to be rectified. In this regard:

- the ivory stock registration that was conducted pursuant to the mandate in *Decree No. 97-130* (1997) needs a renewed commitment;
- the alleged outstanding stocks of ivory need to be identified and seized, if appropriate, as a violation of this legislation;

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- a follow-up assessment of the status of the 224 ivory owners, holding 7,110.7 kg of ivory that was registered by December 1998, needs to be undertaken; and,
- concerning the results of any such follow-up assessment, punitive measures should be taken against those individuals or companies who have increased or disposed of their holdings in a manner that is not commensurate with the provisions of *Decree No. 97-130*.

### *Monitoring ivory manufacturers, wholesalers and retailers*

Effective controls are lacking with respect to Côte d'Ivoire's ivory industry at a number of important levels and consequently needs to be addressed. In this regard:

- registration and licensing requirements for Côte d'Ivoire's ivory producers and traders need to be reviewed and new measures put in place where deficiencies or loopholes are noted;
- those who failed to register their stocks of ivory pursuant to the exercise in 1998 should be barred from further trade and have their stocks confiscated; and,
- those individuals or companies who continue to qualify for the disposal of their stocks of ivory, future inspection procedures need to be established and routinely undertaken on the part of the appropriate government authorities.

### *Implementing ETIS*

Côte d'Ivoire is currently failing to implement ETIS adequately and steps to improve the situation need to be taken. In this regard:

- collaboration between Customs, police and other law enforcement bodies needs to be enhanced so that the designated wildlife authorities are informed, and able to report to CITES, all elephant product seizures which occur in the country in a timely manner; and,
- a retrospective data collection exercise, covering the period 1989 to the present, should be launched so that elephant product seizure cases that have never been communicated to ETIS can be identified and reported.

## SENEGAL

The following actions are recommended to improve ivory trade controls in Senegal.

### *Improving policy, legislation and regulatory measures*

The legal framework for control of Senegal's domestic trade in ivory is extremely weak, and allows for an uncontrollable situation. There is an urgent need to establish a firm legal basis for monitoring and controlling ivory trade within the country, particularly at the retail level. In this regard:

- a legal requirement to register and license all ivory traders and manufacturers needs to be put into place;
- a legal requirement to register all stocks of commercially-held raw, semi-worked and worked ivory within a specified period of time needs to be established;
- a legal requirement to register all stocks of privately-owned raw, semi-worked and worked ivory above and beyond some legally designated minimal personal effects threshold needs to be established;
- a legally mandated system of control needs to be developed so that any subsequent disposal or transfer of stocks can be tracked in an accountable and transparent manner, including obligations for the maintenance of stock inventory registers and regular reporting requirements; and,
- a formal date needs to be legally established by which time all commercial sales of ivory, including those at the retail level, must cease in order to prevent an indefinite and ongoing 'clearing out' period.



*Addressing implementation and enforcement deficiencies*

Senegal continues to struggle with a general lack of commitment towards the implementation and enforcement of wildlife legislation, including the country's obligations under CITES, and this state of affairs needs to be corrected. In this regard:

- public expressions of political will and commitment that support implementation of wildlife trade controls and CITES obligations from officials representing the highest levels of government are needed; and,
- collaboration between Customs and wildlife authorities from the Directorate of Water, Forests and Hunting must be enhanced and formally supported.

It is unacceptable that official government wildlife authorities policing trade in CITES-listed species are denied access to Senegal's ports of entry and exit. In this regard:

- all jurisdictional impediments that prevent Ministry of Water, Forests, Hunting and National Parks agents from undertaking effective law enforcement actions at the ports of entry and exit should be removed with immediate effect;
- a formal protocol between port authorities, Customs, police and law enforcement agents of the Water, Forests, Hunting and National Parks needs to be put in place; and,
- such a protocol should establish a basis for effective future operations, including a code of conduct, collaborative procedures, information sharing, access rights and obligations, and other related issues.

Continuing allegations concerning the complicity and collusion of Customs authorities in the illicit trade in ivory in Senegal are cause for great concern and must be addressed in a serious manner. In this regard:

- government should mandate an independent Commission of Inquiry and launch a formal investigation;
- issues to be investigated should include whether or not Customs officials have made interventions that facilitate the flow of illegal shipments of ivory and ivory traders through Customs control channels at the ports of entry into the country, and whether or not Customs officials have disposed of seized ivory stocks and products into the hands of local traders; and,
- the results of the investigation should become a matter of public record and any guilty parties dealt with in a legally appropriate manner, including suspension or termination of employment.

Continuing allegations concerning the involvement of diplomatic missions or personnel in the illicit movement of ivory out of Senegal is an important issue that should be investigated. In this regard:

- the Ministry of Environment should conduct a public awareness effort to sensitise the diplomatic community concerning any involvement in the illegal movement of ivory or ivory products in or out of the country; and,
- any future case involving complicity of a diplomatic mission or any of its personnel should not be tolerated.

Because the most frequently mentioned trade routes and means for conveying illicit shipments of ivory into Senegal concern air connections to Dakar and the road route Medina-Gounas, there is an urgent need to improve law enforcement efforts and procedures. In this regard:

- law enforcement bodies also need to target for special attention all flights coming into the country that originate in, or transit through, the Democratic Republic of the Congo, Cameroon, Gabon and Central African Republic;
- law enforcement bodies need to target for special attention the road route linking Senegal with Guinea at the border post in Medina-Gounas in the south of the country; and,
- methods to effectively screen incoming passengers and cargo for ivory and other elephant products need to be developed and implemented.

### *Enhancing ivory stock management*

With very few elephants, Senegal has never developed an ivory stock management policy, but currently there is a total lack of control over ivory that derives from law enforcement actions and this needs to be corrected. In this regard:

- a clear policy with transparent and accountable procedures concerning the management and storage of all ivory that derives from future seizures or other means needs to be developed to prevent ‘leakage’ or disposal onto local ivory markets; and,
- a designated government body should be mandated to assume responsibilities for the implementation of such a policy.

### *Monitoring ivory manufacturers, wholesalers and retailers*

Senegal lacks effective controls over its ivory industry and this deficiency stands behind continuing illegal trade in ivory. Corrective measures are needed. In this regard:

- registration and licensing requirements for those engaged in the domestic processing, trading and selling of ivory need to be established; and,
- a legal mandate that provides a solid basis for future inspection and law enforcement action at the processing, wholesale and retail levels of trade should be developed.

### *Implementing ETIS*

Senegal is currently failing to implement ETIS adequately and steps to improve the situation need to be taken. In this regard:

- collaboration between Customs, police and other law enforcement bodies needs to be enhanced so that the designated wildlife authorities are informed, and able to report to CITES, all elephant product seizures which occur in the country in a timely manner; and,
- a retrospective data collection exercise, covering the period 1989 to the present, should be launched so that elephant product seizure cases that have never been communicated to ETIS can be identified and reported.

## **NIGERIA**

The following actions are recommended to improve ivory trade controls in Nigeria.

### *Improving policy, legislation and regulatory measures*

There is a pressing need to clarify legal issues associated with the *Endangered Species (Control of International Trade) Decree No. 11* (1985) and the *Wild Animals Law* (No. 16 of 1963; as amended 1975). As the principal Federal and State laws for implementing CITES and addressing wildlife trade issues in Nigeria, there are certain loopholes and ambiguities with respect to trade in ivory which must be rectified immediately. It is a matter of concern that these issues have been ongoing for some 14 years. In this regard:

- the African Elephant should immediately be designated a Schedule I species under the *Endangered Species (Control of International Trade) Decree No. 11* (1985) for which trade is strictly prohibited;
- such a designation should be communicated to all States using the *Wild Animals Law* (No. 16 of 1963; as amended 1975), instructing them to also immediately list the African Elephant on Schedule I in terms of State law;
- all legal provisions that allow for the disposal of ivory from Problem Animal Control situations should be revoked and this avenue of legal trade curtailed at both the Federal and State levels;
- a legal requirement to register all ivory manufacturers, wholesalers and retailers in the country needs to be established;

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- a legal requirement to register all stocks of commercially-held raw, semi-worked and worked ivory within a specified period of time needs to be established;
- a legal requirement to register all stocks of privately-owned raw, semi-worked and worked ivory above and beyond some legally designated minimal personal effects threshold needs to be established; and,
- a formal date needs to be legally established by which time all commercial sales of ivory, including those at the retail level, must cease in order to prevent an indefinite and ongoing ‘clearing out’ period.

### *Addressing implementation and enforcement deficiencies*

The lack of commitment towards the implementation and enforcement of wildlife legislation in Nigeria is a matter of urgent concern and needs to be corrected. In this regard:

- Government at the highest levels must exert the necessary political will and commitment needed to address and mitigate long-standing enforcement issues; and,
- collaboration between Federal and State authorities, and Customs, police and Ministry of Environment officials must be enhanced through formal mechanisms.

The fact that Ministry of Environment law enforcement personnel (or their predecessors) have been denied access to Nigeria’s ports of entry and exit since 1992 is unacceptable and needs to be addressed through immediate corrective action. In this regard:

- all jurisdictional impediments that prevent Ministry of Environment agents from undertaking effective law enforcement actions at the ports of entry and exit should be removed with immediate effect;
- a formal protocol between port authorities, Customs, police and law enforcement agents of the Ministry of Environment needs to be put in place; and,
- such a protocol should establish a basis for effective future operations, including a code of conduct, collaborative procedures, information sharing, access rights and obligations, and other related issues.

The fact that ivory products are readily available at Nigeria’s international airports, including within the departure lounge area which stands as an indisputable violation of CITES, is unacceptable and should be immediately corrected. In this regard:

- the display and sale of all ivory products within the premises of Murtalla Mohammed International Airport in Lagos and at other international airports in the country should be prohibited with immediate effect; and,
- such ivory products should be confiscated by the government if their display and sale is found to be a violation of Nigeria’s laws.

Continuing allegations concerning the complicity and collusion of Customs authorities in the illicit trade in ivory in Nigeria are cause for great concern and must be addressed in a serious manner. In this regard:

- government should mandate an independent Commission of Inquiry and launch a formal investigation;
- issues to be investigated should include whether or not Customs officials have made interventions that facilitate the flow of illegal shipments of ivory and ivory traders through Customs control channels at the ports of entry into the county, and whether or not Customs officials have disposed of seized ivory stocks and products into the hands of local traders; and,
- the results of the investigation should become a matter of public record and any guilty parties dealt with in a legally appropriate manner, including suspension or termination of employment.

Continuing allegations concerning the involvement of diplomatic missions or personnel in the illicit movement of ivory out of Nigeria is an important issue that should be investigated. In this regard :

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- the Ministry of Environment should conduct a public awareness effort to sensitise the diplomatic community of the illegality of the ivory trade in Nigeria and call for co-operation in preventing the illegal movement of ivory or ivory products in or out of the country; and,
- any future case involving complicity of a diplomatic mission or any of its personnel should not be tolerated.

Because the most frequently mentioned trade routes and means for conveying illicit shipments of ivory into Nigeria concern major road and air connections, there is an urgent need to improve law enforcement efforts and procedures. In this regard:

- law enforcement bodies need to target for special attention the major road routes linking Nigeria with Cameroon and Chad as these routes are frequently used to convey ivory into the country, especially the road links between Ndjamena (Chad) and Maroua (Cameroon) and Maiduguri (Nigeria), and Eyumojok (Cameroon) and Calabar or Ikom (Nigeria);
- law enforcement bodies also need to target for special attention all flights coming into the country that originate in, or transit through, the Democratic Republic of the Congo, Congo (Brazzaville), Cameroon, Gabon and Central African Republic; and,
- methods to effectively screen incoming passengers and cargo for ivory and other elephant products need to be developed and implemented.

### *Enhancing ivory stock management*

With elephants falling under both Federal and State jurisdictions, Nigeria lacks an ivory stock management policy at the national level. The current lack of control over ivory needs to be corrected. In this regard:

- a national policy concerning the management and storage of ivory that derives from problem animal control, seizures or other means needs to be developed to prevent 'leakage' or disposal onto local ivory markets;
- such a policy needs to be implemented at both State and Federal levels in a transparent and accountable manner; and,
- a designated lead government body should be mandated to assume responsibilities for tracking ivory stocks throughout the country and preparing periodic updates and status reports within the framework of such a policy.

### *Monitoring ivory manufacturers, wholesalers and retailers*

Nigeria lacks effective controls over its ivory industry and this deficiency stands behind continuing illegal trade in ivory. Corrective measures are needed. In this regard:

- registration and licensing requirements for those engaged in the domestic processing, trading and selling of ivory need to be established; and,
- a legal mandate that provides a solid basis for future inspection and law enforcement action at the processing, wholesale and retail levels of trade should be developed.

Information collected during the present survey indicates that other cities in Nigeria are likely to harbour significant ivory trade industries. In this regard:

- market surveys and investigations should be conducted in Benin City, Onitsha and Port Harcourt to assess domestic ivory markets and manufacturing in these places.

### *Implementing ETIS*

The lack of access to the ports of entry and exit is partially responsible for Nigeria's failure to implement ETIS and steps to improve the situation need to be taken. In this regard:

- collaboration between Customs, police and other law enforcement bodies needs to be enhanced so that the designated wildlife authorities are informed, and able to report to CITES, all elephant product seizures which occur in the country in a timely manner; and,

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- a retrospective data collection exercise, covering the period 1989 to the present, should be launched so that elephant product seizure cases that have never been communicated to ETIS can be identified and reported.

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## More Ivory than Elephants: domestic ivory markets in three West African countries

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TRAFFIC, the wildlife trade monitoring network, works to ensure that trade in wild plants and animals is not a threat to the conservation of nature. It has offices covering most parts of the world and works in close co-operation with the Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

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