

September 22, 2021

**The Honourable Jonathan Wilkinson**

Minister, Environment and Climate Change  
House of Commons Ottawa, ON K1A 0A6

Dear Minister Wilkinson,

We, the undersigned organizations and leading scientists—collectively representing tens of millions of supporters worldwide—are writing to urge the Canadian government to uphold your G7 commitment to preserve global biodiversity by implementing a strong prohibition on elephant ivory trade.

We sincerely applaud your initiative to launch a public consultation to gather feedback on such a prohibition and indeed, there is considerable urgency in taking action. In recent decades, between 25,000 and 50,000 elephants have been killed in Africa annually, with even the lowest estimate exceeding the elephant birth rate. Alarming, African elephant numbers have declined by a staggering 96 percent in the past century alone and, this year, the International Union for Conservation of Nature (IUCN) listed African elephant populations as Critically Endangered and Endangered.

The decline of African elephants is largely driven by poaching, motivated by global demand for ivory. Accordingly, delegates to the 17th Conference of the Parties (CoP 17) of the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES) adopted a resolution in 2016 calling on the world community to shut down legal domestic ivory markets that contribute to elephant poaching and illegal ivory trade "as a matter of urgency."

Allowing elephant ivory trade, including the import of elephant ivory from cruel trophy hunts, not only creates channels for laundering illegal elephant ivory but also perpetuates the demise of African elephants and biodiversity.

Repeated government seizures of elephant ivory in Canada since 2010 (including twenty-one non-compliance cases resulting in seizures of elephant ivory goods) are definitive evidence of ongoing illegal trade that contributes to poaching. Moreover, customs interceptions represent just a small fraction of illegal products on the market, making such seizures likely the tip of the iceberg of Canada's illicit trade. Regardless, all legal ivory markets provide mechanisms and channels for laundering of illegal ivory, while Canada's continued trade in elephant ivory provides validation for other nations to do the same.

Notably, in 2019, the critical need to close all domestic markets for ivory was emphasized at the CITES CoP 18 by Burkina Faso, Côte d'Ivoire, Ethiopia, Gabon, Kenya, Liberia, the Niger, Nigeria and the Syrian Arab Republic. Together, the nations called upon CITES to strengthen the prior resolution by urging parties, as a matter of urgency, to take steps to end their legal ivory markets whether or not those markets were contributing to poaching. The resolution noted

that, “maintaining a domestic ivory market creates opportunities for laundering illegally obtained ivory, presents monitoring and enforcement challenges, in particular due to the difficulty of policing online trade, and undermines ivory bans in other countries by providing an alternative outlet to which suppliers and traffickers can re-locate.” The African Elephant Coalition, comprised of 32 African nations (including 29 range states) echoes this sentiment, stating that, “any supply of ivory, including that within otherwise legal domestic markets, inherently increases the risk to elephant populations and local communities, due to the opportunity it creates for the laundering of illegal ivory under the guise of legality.”

Given the above and the urgency of the situation, we are writing to support the implementation of the following measures listed in the consultation:

#### Commercial Trade

- An import or re-export prohibition for Appendix II specimens for commercial purposes
- An import or re-export prohibition for pre-Convention raw ivory for commercial purposes.
- An import or re-export prohibition for pre-Convention worked ivory for commercial purposes

#### Non-commercial trade

- Prohibition of import of hunting trophies into Canada
- Prohibition of re-export of hunting trophies from Canada.
- For other non-commercial movement related to enforcement activities, scientific research, display at a museum, musical instruments, gallery or educational institute: A requirement for an import permit for Appendix II for ivory specimens to allow better control before entry into Canada

#### Personal and household items

- Replacement of the permit exemption for personal ivory items with a requirement of an import or export/re-export permit
- Restriction of allowable personal movement of personal ivory items that are part of a household move or inheritance

The Canadian government is at a crossroads and the decisions taken on this issue will be remembered for generations to come. We respectfully request that you act quickly to end Canada’s elephant ivory trade so that future generations may have the privilege of coexisting with these majestic animals.

Sincerely,

Arend de Haas, Director Conservation - **African Conservation Foundation**  
Christina Scaringe, General Counsel - **Animal Defenders International**  
Camille Labchuk, Executive Director - **Animal Justice**

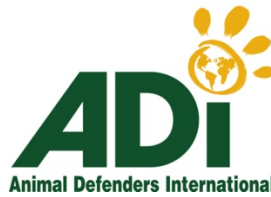
Jill Robinson, Founder & CEO - **Animals Asia Foundation**  
Dr. Sara Dubois, Chief Scientific Officer - **BC SPCA**  
Raymond Stone, Chairperson - **Big Life Foundation Canada**  
Mark Jones, Head of Policy - **Born Free Foundation**  
Antoinette van de Water - **Bring The Elephant Home**  
Nicole Rycroft, Founder and Executive Director - **Canopy**  
Ericka Ceballos, CEO - **CATCA Environmental and Wildlife Society (CEWS)**  
Andrea Crosta, Executive Director - **Earth League International (ELI)**  
Fran Duthie, President - Co-Founder - **Elephanatics**  
Liz Rowland - **Elephant Listening Project**  
Dr. Marion Garai - **Elephant Reintegration Trust**  
Brett Mitchell - **Elephant Reintegration Trust**  
Anna Zangger, Head of International Campaigns - **Fondation Franz Weber**  
Anna Mulà, Lawyer - **Fondation Franz Weber**  
Donalea Patman, OAM - **For the Love of Wildlife Ltd**  
Shawn Rorke, Director K-12 Education, Emeritus - **Frank Lloyd Wright Foundation**  
Rosemary Alles, President and Co-founder - **Global March for Elephants and Rhinos**  
Barbara Cartwright, CEO - **Humane Canada**  
Rebecca Aldworth, Executive Director – **Humane Society International/Canada**  
Teresa Telecky, Vice-President Wildlife – **Humane Society International**  
Sheryl Fink, Director, Canadian Wildlife Campaigns - **IFAW Canada**  
Judy Rees - **Insure Our Future**  
Alan Knight OBE, President - **International Animal Rescue**  
Jake Wall, Director of Research and Conservation - **Mara Elephant Project**  
Virginia Woolf, Founder - **New Zealanders for Endangered Wildlife**  
Annelise Sorg, President - **No Whales in Captivity**  
Elly Pepper, Deputy Director, International Wildlife Conservation - **NRDC**  
Beth Hill, Board Member-Advisor - **Nsefu Wildlife Conservation Foundation**  
Douglas Wolhuter, NSPCA Wildlife Protection Unit - **NSPCA**  
Gregg Tully, Executive Director - **Pan African Sanctuary Alliance**  
Catherine Doyle, Director of Science, Research & Advocacy - **Performing Animal Welfare Society (PAWS)**  
Daniela Freyer, Co-Founder - **Pro Wildlife**  
Janine Cavin, Co-Founder & Director - **Rhino & Elephant Defenders (RED)**  
Saengduean Chailert, Founder - **Save Elephant Foundation**  
Chris Morris, Director - **SEEJ-AFRICA (Saving Elephants through Education and Justice)**  
Marie Levine, Executive Director - **Shark Research Institute**  
Robert Brandford, Executive Director - **Sheldrick Wildlife Trust**  
Ann Michels, Executive Director - **Species Survival Network**  
Kate Mason, Senior Communications Manager - **The Elephant Sanctuary in Tennessee**  
Jane Alexandra, Co-founder - **Two Million Tusks**  
Dr. Paula Kahumbu, Chief Executive Officer - **WildlifeDirect**  
Melissa Matlow, Campaign Director - **World Animal Protection Canada**

Kate Nustedt, Programme Director, Animals in the Wild - **World Animal Protection International**

Patricia Sims, Founder, Executive Director - **World Elephant Day**

Rob Laidlaw, Executive Director - **Zoocheck Inc.**

Amy Morris, Executive Director - **Vancouver Humane Society**







**National Council  
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**WILDLIFE CRIME WATCH IS OUR 'RAISON D'ETRE'**



TWO MILLION TUSKS 

