



中华人民共和国濒危物种进出口管理办公室
**The Endangered Species Import and Export
Management Office of the People's Republic of China**

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To: Ms. Ivonne Higuero
CITES Secretary-General
Fax: +41 22 7973417
Date: 2 August 2022

**Subject: Consultation on Parties to be considered for inclusion in the National
Ivory Action Plans (NIAP) process**

Dear Ms. Ivonne Higuero,

Greeting from China!

Your letter referenced SG/JSt/2022/CN/01 and its annex is received. According to Annex 3 to Res. Conf. 10.10 (Rev. CoP18), we hereby provide you with the following additional information.

1. On the large scale seizure in country

China has long attached great importance to combating illegal trade in ivory, especially those large scale cases. CITES is legally binding to all the Parties. Only when the countries of origin or transit failed to make seizures, China at the end of illegal trade chain might have the chance to make seizures.

Such seizure made is a mixed indicator, showing not only the presence of the problem, but also the ability and determination to solve it, as well as the strictness of China legislation on it. Most importantly, through the determined hardworking at the end of the whole defense lines, China maintained the dignity of CITES provisions, as well as prevented organized crime from making money from illegal trade in ivory.

2. On the clustering analysis

Clustering analysis is a contentious way. For example, the percentage of large scale seizure (50%) is much higher than that of China (9%). By combining Vietnam and China in a cluster, the average of the cluster fails to describe the situation of China in an objective manner, in which the scale of illegal trade involving China is clearly exaggerated.

3. On the seizure of worked ivory

China has domestic measures stricter than CITES in place, no exemptions on household or personal effects, nor pre-Convention specimen. Large amount of small worked ivory came from international tourist who came back home with some souvenirs bought in foreign countries.

China realizes this problem and made several visits to African countries to educate overseas Chinese to stay away from illegal trade. Meanwhile, China through SMS to familiarize Chinese tourists with the stricter domestic measures in China.

4. On the seizure-out by other countries

China encourages the countries of origin or transit to make seizure as soon and early as possible, and facilitates them to make seizure through intelligence sharing and assistance. The sooner and earlier the seizure is made, the higher probability a successful deterrence to illegal killing is formed.

5. On seeming the origin of ivory seized

Due to historical reason and the characteristics of ivory and its products, Europe, U.S, and Japan have accumulated tons of ivory stockpiles. To kill an elephant is not the sole source of ivory in illegal trade. The term “seems to” made this report lack of rigor. It is controversial when the countries of origin or transit made seizures and then had counties of destination implicated since a reliable and agreed verification mechanism is still missing, as is pointed out by the ETIS review.

6. On major illegal ivory destination

We are of the opinion that ETIS report, based on seizure data, can reflect the law enforcement efforts and reporting efforts to some extent. However, ETIS report can not draw a conclusion such as major illegal ivory destination. The conclusion that China is inferred as the major illegal ivory destination obviously lacks the most basic scientific basis and logic.

In conclusion, China has put in place the strictest measure in ivory trade. In the international trade aspect, China has stricter domestic measures. In the domestic trade aspect, China has banned commercial processes and sales of ivory. China shall not be included in NIAP again at SC75. China is willing to work with the Secretariat and the Parties to the end illegal trade in ivory.

Regards,

A handwritten signature in black ink, appearing to be 'Zhang Zhizhong', written in a cursive style.

Mr. Zhang Zhizhong

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Grassland Administration of China /

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