

September 22, 2021

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To: Environment and Climate Change Canada
Email: ReglementsFaune-WildlifeRegulations@ec.gc.ca

Re: Discussion document on a range of potential actions pertaining to trade controls in elephant ivory in Canada

Elephants need our help. Urgently. Once common throughout Africa and Asia, elephant populations have declined significantly over the last century. In fact, the greatest threat to African elephants is poaching for the illegal ivory trade.¹ An estimated 30,000 are killed each year.²

Canadians must travel a long way to see elephants in their natural habitat and yet citizens care about the fate of these highly intelligent animals. Polling shows that Canadians care deeply about wildlife and understand the connection between the health of wildlife populations and human health.³

Wildlife does not have a direct voice in policymaking and thus, Canadians rely on government officials to make the right decisions and help build a more sustainable world for future generations. We applaud the Government of Canada's efforts to initiate dialogue and consultation on this important issue.

Through this letter, we strongly urge the Government of Canada to take **immediate actions to meaningfully strengthen domestic measures related to the importation and exportation/re-exportation of elephant ivory**. Below we outline support for specific proposals presented in *Discussion document on a range of potential actions pertaining to trade controls in elephant ivory in Canada*. Success will take the form of implementing measures that go beyond the status quo covering all forms of trade.

We find it difficult to foresee a scenario where elephant populations thrive without policymakers across jurisdictions making great strides to protect them, including by strengthening trade controls. Though elephants in the wild live a long way from Canada, we

¹ World Wildlife Fund. *Elephant – Facts*. Available at: <https://www.worldwildlife.org/species/elephant>

² National Geographic. *Asian Elephant*. Available at: <https://www.nationalgeographic.com/animals/mammals/facts/asian-elephant?loggedin=true>

³ Northstar Research Partners (for World Animal Protection). *Canadians' Attitudes Towards a Global Wildlife Ban*. Available at: https://dkt6rvnu67rqi.cloudfront.net/cdn/ff/-YtngchPNmOyQZF-1kmIHV0dOMCyJY4YU9X7cwIwp5o/1595614885/public/media/Global_Wildlife_Ban_Study_Report_World_Animal_Protection_July_2020.pdf

have a unique opportunity as a country to contribute to global efforts to protect elephants by restricting the trade in ivory.

About Us

Dawson Strategic is a consulting firm that specializes in evidence-based research on policy issues related to international trade, transportation and infrastructure, and sustainability. We are committed to helping build a more sustainable world. We regularly support *pro bono* research assignments on topics related to the global wildlife trade and wildlife conservation.

Context

The plight of elephant populations and the extreme pressure they face from poaching and other threats is well documented and will not be outlined here. Rather, given the universal acceptance that indeed these creatures need our help in every way possible, we outline three foundations of rationale for stronger measures to be taken by the Government of Canada covering the trade in ivory.

The health of Canadians is connected to the health of wildlife and wild spaces

It is not a stretch to understand that the fate of our species depends on other species, such as elephants, thriving. This idea is best captured through the concept of ‘One Health’, and while there is no universally agreed upon definition of the term, at its heart ‘One Health’ recognizes that the health of humans, animals, and ecosystems are interconnected.⁴ Thus, measures taken to protect elephant populations by further restricting the trade in ivory are in fact meaningful steps to protect the health of humans across the globe.

Canada has an opportunity to reinforce its development goals

Canada has made acting on the 2030 Agenda and achieving the United Nations (UN) Sustainable Development Goals (SDGs) a priority. Canada’s *2030 Agenda National Strategy* is a milestone in our efforts as a country to work with other countries to end poverty, protect the planet, and ensure that all people enjoy peace and prosperity by 2030.⁵

Taking measures to further restrict the trade in ivory directly supports Canada’s ongoing efforts to work towards the UN SDGs. For example, UN SDG 15.7 is *Take urgent action to end poaching and trafficking of protected species of flora and fauna and address both demand and supply of illegal wildlife products*. Policymakers can make a clear and tangible contribution towards this UN SDG by taking immediate steps to further limit the trade in ivory.

Moreover, while the economic benefits of elephant conservation are poorly understood, research published in the journal *Nature Communications* puts the figure of the lost economic benefits that poached elephants would have delivered to African countries via

⁴ Mackenzie, John S., and Martyn Jeggo. 2019. "The One Health Approach—Why Is It So Important?" *Tropical Medicine and Infectious Disease* 4, no. 2: 88. <https://doi.org/10.3390/tropicalmed4020088>

⁵ Government of Canada. *Canada takes action on the 2030 Agenda and Sustainable Development Goals*. Available at: <https://www.canada.ca/en/employment-social-development/programs/agenda-2030.html>

tourism at about \$25 million USD annually.⁶ Our partner countries in Africa deserve better so we must do all we can to allow them to gain economically from sustainable forms of elephant tourism.

The ivory trade is inconsistent with Canadian values

We know that continuing the trade in elephant ivory is inconsistent with Canadian values. An online petition created by Elephanatics, a Vancouver-based elephant advocacy organization, had 643,642 signatures (as of September 14, 2021), calling for a ban on the sale of elephant ivory in Canada.

Similar evidence regarding where Canadians stand on wildlife issues comes from a recent survey produced for World Animal Protection which found that nearly all (80 percent) of Canadians agree that wildlife trade is cruel, threatens biodiversity, and threatens health.⁷ While this survey focused on the illicit trade in wildlife and its connection to COVID-19, it provides valuable insight into how Canadians view trading wildlife and/or wildlife parts.

Few issues could unite Canadians across geographic, age, and other categories like the desire for our government to act to help reduce the needless slaughter of intelligent animals like elephants.

Recommendations

The discussion paper identifies three categories of trade to consider: 1) commercial 2) non-commercial and 3) personal and household items.

Commercial Trade

Regarding commercial trade, we recommend the following actions be taken:

- 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; and
- An import or re-export prohibition for pre-Convention worked ivory for commercial purposes.

Non-commercial trade

For hunting trophies, a grotesque term given its reference to a body part of an animal killed for entertainment, **the Government of Canada should immediately introduce a complete and total prohibition on the import of hunting trophies into Canada.** Full stop. Anything less legitimizes practices that are not consistent with Canadian values.

⁶ Naidoo, R., Fisher, B., Manica, A. *et al.* Estimating economic losses to tourism in Africa from the illegal killing of elephants. *Nat Commun* 7, 13379 (2016). <https://doi.org/10.1038/ncomms13379>

⁷ Northstar Research Partners (for World Animal Protection). *Canadians' Attitudes Towards a Global Wildlife Ban*. Available at: https://dkt6rvnu67rqi.cloudfront.net/cdn/ff/-YtngchPNmOyQZF-1kmIHV0dOMCyJY4YU9X7cwIwp5o/1595614885/public/media/Global_Wildlife_Ban_Study_Report_World_Animal_Protection_July_2020.pdf

We expect you will be hearing from hunters and hunting associations who want to be able to import “trophies”, however, this is clearly an example of where the narrow interests of a few should not outweigh the general interest in protecting elephants and other animals. According to recent polling, Canadians nearly universally do not support trophy hunting.⁸

For other non-commercial movement, we support the idea of requiring an import permit for Appendix II ivory specimens to better allow control before entry into Canada.

Personal and household items

Concerning the movement of personally owned elephant ivory items, we recommend the Government of Canada replace the permit exemption for personal ivory items with a requirement for an import or export/re-export permit. This will help ensure this type of movement of ivory items is not used as a loophole for illegal trade.

Summary

Taken together, these actions would demonstrate a credible effort by Canada to implement measures that go beyond what is required by CITES (recognizing that Canada already has measures that go beyond CITES requirements in place).

There will be no second chances when it comes to protecting elephant populations, or any other endangered species for that matter. If enough countries take the bold steps that are needed now, we may be lucky enough for future generations to enjoy seeing elephants roam freely in the wild.

We are excited at the prospect of Canada strengthening its framework governing the ivory trade and look forward to further engagement on this issue.

⁸ Northstar Research Partners (for World Animal Protection). *Canadians’ Attitudes Towards a Global Wildlife Ban*. Available at: https://dkt6rvnu67rqj.cloudfront.net/cdn/ff/-YtngchPNmOyQZF-1kmIHV0dOMCyJY4YU9X7cwIwp5o/1595614885/public/media/Global_Wildlife_Ban_Study_Report_World_Animal_Protection_July_2020.pdf