

NSS Feedback to AVA's Proposal of a Total Ban on Ivory in Singapore

The Nature Society Singapore (NSS) strongly supports the Agri-Food and Veterinary Authority of Singapore (AVA)'s proposal of a total ban on ivory in Singapore. A ban on domestic trade will close the route for illicit ivory to be legally sold in Singapore and would demonstrate the country's commitment to tackling illegal wildlife trade – which has global significance given Singapore's status as an important transit country for high volume consignments of illicit ivory.

NSS notes that the proposed ban did not state any exemptions, potentially making it one of the strongest ivory bans in the world. In order to effectively reduce demand for ivory and disincentivise poaching, NSS suggests the following:

- **Indefinite ban**
NSS recommends for AVA to explicitly state that the ban would be indefinite. This would prevent stockpiling and speculation of ivory.
- **Quicker implementation of the ban – reduce grace period of three years**
Research (Harvey et al., 2017) has shown that quick implementation of an ivory ban would force ivory speculators to offload their stock in a short space of time, thereby driving prices down and which in turn disincentivises poaching. Issuance of import and export licenses for pre-convention ivory should also be immediately suspended. This is to ensure that stockpiling of new ivory or the increased supply or demand in other countries will not result due to the ban.
- **Heavier penalties**
Illegal wildlife trade is often closely linked with other “serious crimes” such as drug trafficking, human trafficking and terrorism. According to The United Nations Convention against Transnational Organized Crime, a “serious crime” is a crime punishable by four years or more in prison. However, Singapore's current penalties for illegal wildlife trade under the Endangered Species (Import and Export) Act does not commensurate with this. It is inevitable that there will be increased incentive for trading ivory on a black market following a total ban and heavier penalties should be in place to deter this.
- **Commit more resources for ban implementation**
A notable number of ivory shipments have previously passed through Singapore undetected (Traffic, 2013). The sheer volume and frequency of goods transported in and out of Singapore make detection of ivory through one of the world's busiest ports extremely challenging. This makes it all the more necessary to have scaled up deployment of resources across the relevant enforcement agencies (e.g. police, border controls, cybercrime and customs units). There should also be an increase in intelligence-led investigations, risk profiling and targeting of certain types of cargo, particularly from key ivory export countries. A key enabler of this would be to have direct co-operative links between Singapore's enforcement agencies and source and demand countries.
- **Ban on purchase**
It is noted that AVA is proposing to only ban the sale of elephant ivory and ivory products but has not proposed banning the purchase of such ivory and products. It is recommended that a ban on the purchase of such ivory and products also be introduced. In order to truly undermine the ivory trade, the law must target both sides of the trade.

References

Harvey, R., Alden, C., and Wu, Y. (2017) Speculating a Fire Sale: Options for Chinese Authorities in Implementing a Domestic Ivory Trade Ban. *Ecological Economics* 141: 22-31

TRAFFIC Bulletin Vol 25. No. 2 (2013)

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