



WCS
SAVING WILDLIFE AND WILD PLACES

22 August 2019

Department for Environment, Food, and Rural Affairs

To whom it may concern,

Thank you for the opportunity to submit comments regarding the “Non-elephant ivory trade”, in response to the open comment period from 30 May – 22 August 2019 (and found at <https://consult.defra.gov.uk/communications/non-elephant-ivory-trade/>). We have provided an overview and then address questions for which we have sufficient information or knowledge to respond. This information has been provided by our WCS Arctic Beringia Program (see <https://www.wcs.org/our-work/regions/arctic-beringia>).

The Wildlife Conservation Society (WCS) was founded in 1895 with the mission of saving wildlife and wild places. Globally, WCS aims to conserve the world's largest wild places in 15 priority regions, home to more than 50% of the world's biodiversity. With our government and local partners, WCS manages more than 200 million acres of protected lands, employing more than 4,000 staff including 200 Ph.D. scientists and 100 veterinarians. We are headquartered in the United States, and currently have projects and programs in more than 60 countries.

WCS aims to protect Arctic wildlife such as polar bear, arctic fox, muskoxen, whales, walrus, seals, and shorebirds from pressures related to a rapidly changing climate and the onset of new industrial development. At the same time, WCS works to ensure the region's indigenous communities can continue to depend on local resources for food, as well as economic and cultural vitality. Implementing conservation in such a rapidly changing environment can only be effective through working with scientists, local experts, and indigenous communities.

Recent concerns have been raised regarding the impact of national-level elephant ivory bans and various state (United States) ivory bans on the ability of Native Alaskans to carve and sell their legally hunted Pacific walrus ivory. WCS respects the federally protected rights of Native Alaskans through the U.S. Marine Mammal Protection Act (MMPA) to sustainably hunt marine mammals and to use their parts to produce and sell authentic handicrafts. A wealth of scientific evidence supports the perspective that wildlife and natural resources are most likely to be conserved when they are co-managed with the people whose wellbeing and culture are both founded and dependent on them. Partnering with indigenous groups is central to WCS's conservation work in key landscapes. In the Arctic, WCS works closely with Alaska Native groups and other partners to promote sustainable indigenous livelihoods.

WCS scientists are working to save elephants in several countries in Central, Eastern, and Southern Africa, through our field-based and counter-wildlife trafficking programs. WCS is also working to stop the trafficking of and consumer markets for elephant ivory through various efforts including promoting the establishment of domestic bans on the commercial sale of elephant ivory. The Federal rule recently finalized by the US Fish and Wildlife Service on ivory applies only to ivory from African elephants. No ivory or similar products from any other species were included, as is the case with the United Kingdom's Ivory Act.

WCS understands the importance of Native Alaskans' reliance on natural resources for their economic and cultural vitality. We are committed to working with Alaska Native partners to both implement effective conservation strategies for species such as Pacific walrus, and to help resolve their concerns surrounding blanket ivory bans.

Therefore, WCS recommends that you not include Pacific walrus ivory products in any future legislative restrictions on the domestic ivory market in the United Kingdom.

Please let us know if we can provide any further information.

Sincerely,

A handwritten signature in cursive script that reads "Susan Lieberman". The signature is written in black ink and has a fluid, connected style.

Susan Lieberman, Ph.D.
Vice President, International Policy

Section: The conservation status and threats to these species

Q1. Please provide any evidence you have on whether the trade (legal and illegal) in ivory from these species threatens their survival.

If so, does this interact with other threats to these species? If yes, in what way?

Based on monitoring of the Pacific walrus hunt in Alaska and tagging of ivory, there is no evidence nor are there current concerns that harvest of Pacific walrus for subsistence purposes is a threat to the survival of the species. While a statistically robust estimate of the Pacific walrus population that allows trends to be accurately assessed has been elusive, there has not been concern by the federal management agency of a significant population decline (per the Endangered Species Act Status Report for the species). Pacific walrus cannot be legally harvested by non-native peoples in the United States.

Q2. Is there any evidence of a link between the **legal** trade in ivory from these species and illegal wildlife trade? (yes/no)

Please explain and provide evidence. We are not aware of linkages in the case of Pacific walrus (unlike the situation for elephant ivory, where there is clear evidence that the illegal trade hides behind legal markets). Also, international trade in walrus, for example, is not prohibited by CITES; it is allowed under Appendix III rules. International trade is allowed (under CITES Appendix III) from Canada and the U.S., and is strictly regulated in both countries under domestic law. Where infractions have occurred (either in the wasteful hunting of Pacific walrus for ivory alone, or in the illegal distribution of raw ivory and ivory products), they have been prosecuted accordingly under national laws.

Q3. Does the **legal** trade in ivory from these species contribute to their conservation or protection and/or does it support wider biodiversity conservation? (yes/no)

Local indigenous villages in Alaska are taking a leading role in stewardship and management of Pacific walrus. Two examples are Point Lay's stewardship of the large haul-out close to that village, and St. Lawrence Island's development of local hunting ordinances. Continued cultural engagement in management and a strong relationship with walrus (e.g., through consumption or crafting) are critical to local community resilience and wellbeing. Loss of this opportunity to fully engage in the long-standing cultural relationship with walrus and the crafting and trade in walrus products would have a devastating social impact on walrus-reliant communities, and likely to the growing pride and engagement in their essential contribution to local conservation efforts.

Q4. How do we best monitor any threat from trade in ivory on these species?

Evidence of consistent illegal trade in Pacific walrus ivory would be a warning sign; both that the market is strong enough to support illegal trade and that the conventional conservation and monitoring measures are inadequate. With that evidence in hand, local co-management efforts that engage federal agencies and local indigenous representatives (such as the Eskimo Walrus Commission) would work to address how to reduce these threats.

Q5. How do we best identify the point at which a species might become threatened by the trade in its ivory?

The U.S. Fish and Wildlife Service, the Eskimo Walrus Commission, and represented communities currently work together to promote effective management of walrus and the walrus hunt. Together, they work to ensure that the walrus population can sustain the current level of hunting (through population assessment and hunt monitoring), that walrus are not hunted wastefully (through monitoring and implementation of local hunting ordinances), and that products such as ivory are handled legally (e.g., through the marking and tagging program). Warning signs of exceeding a threshold where Pacific walrus are threatened would require evidence of increasing harvest (currently the Pacific walrus harvest is trending down), decreasing overall population of Pacific walrus, cow/calf ratios, or females in the population, and/or evidence that ivory trade is significantly increasing.

Section: What is non-elephant ivory used for?

Q6. Are there any other important or common uses of ivory from these species? If so please provide further information and, if appropriate, indicate if any alternative material can be used. In Alaska, local carving of Pacific walrus ivory is an essential part of local culture and economies, and supported by the Marine Mammal Protection Act. These crafts reflect a long-standing relationship with walrus and cannot be replaced through alternate materials (see Question 7 as well).

Q7. Are there any particular examples of items, which are made from or contain ivory from these species that could be considered of outstanding artistic, cultural or historical value and importance? If so please provide further information.

Absolutely. Some of the excellent work by current Alaskan carvers can be seen in the co-management brochure educating people about legal walrus ivory crafts and regulations - https://www.doi.gov/sites/doi.gov/files/uploads/iacb_alaska_ivory_brochure_2017_web.compressed.pdf

Historical use of walrus ivory is nicely presented in Fitzhugh's 2009 "Gifts from the Ancestors: Ancient Ivories of Bering Strait" (Princeton University Museum Press). Dale Kessler's 1994 "Eskimo carvers of the Bering Sea" also highlights the outstanding work of many recent and contemporary artisans. However, we encourage you to have a conversation with the Eskimo Walrus Commission and Kawerak Inc. (the local regional government for the area where most Alaskan walrus are hunted) for first-hand accounts of the cultural importance of these crafts.

Section: International examples of country-level restrictions on the trade in non-elephant ivory

Q15. We are interested in finding out more about other countries' restrictions on trade in ivory from these species. Please provide any information and/or evidence that you are aware of on this.

In the United States, only Alaska Natives can craft or trade in Pacific Walrus Ivory and resultant products under the U.S. Marine Mammal Protection Act. The trade in walrus ivory within the United States is therefore strictly regulated under the MMPA. Any exports would require a CITES Appendix III certificate, and are legal.