











Lack of effective domestic regulations allows the entry of products manufactured from illegal supplies into the consumer market.

Beyond the stockpile issue, domestic trade regulations also need an overhaul. Currently, LCES regulates the domestic industry and market in two ways: 1) regulation over the trade of specimens maintaining the whole body/carapace shape, and 2) through regulation of businesses dealing in raw tortoiseshell, including the requirement for recording the details of their trade and stockpile balance (Fig. 4). It follows that trade in tortoiseshell exempt from regulation 2) The result is a market where the bulk of products are sold without any proof of legality or traceability, effectively creating an open market to launder illegally sourced products.

Figure 4. Schematic of domestic trade regulations under LCES (produced by WWF Japan)

## ONLINE TRADE

Unregulated sales of tortoiseshell products continue on major e-commerce platforms, posing a risk to the service provider companies and consumers.

Online sales in marine turtle and *bekko* products are legal in Japan under the above-mentioned regulatory scheme. A snapshot analysis of closing bids in 2019 containing the word “*bekko*” on Yahoo Auction, the largest online auction platform in Japan, was carried out by JTEF. This gave a conservative estimate of at least 8,202 sales valued at JPY102 million (USD936,850) materials (Table 2). The composition of unused versus secondhand items could not be discerned. The most common product types were jewelry (72%), followed by eyeglass frames (11%), with the latter comprising nearly 50% of the sales value. Less than 1% or 53 sales were subject to trade regulations, where registrations of individual stuffed specimens and whole carapaces were required. Further analysis by JTEF revealed that only one out of the 53 sales (corresponding to 54 items) was actually conducted according to the legal requirements [6].

Hawksbill products were also observed on other major e-commerce sites. Spot checks by WWF Japan in April 2021 using a keyword search (genuine *bekko* in Japanese) found some 2,924 active advertisements on Mercari, the largest Consumer-to-Consumer trading site. Similarly, some 2,900 and 207 product advertisements, respectively, were found on Yahoo Shopping and Rakuten-Ichiba, two of Japan’s largest online retail malls.



## REFERENCES

1. Milliken, T. and H. Tokunaga. (1987). *The Japanese Sea Turtle Trade 1970-1986*. TRAFFIC Japan. Tokyo, Japan.
- 2.



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