

Response ID ANON-Z236-AHXW-D

Submitted to **Non-Elephant Ivory Trade**

Submitted on **2019-08-22 23:26:50**

Introduction

1 Would you like your response to be confidential?

No

If you answered Yes to this question please give your reason:

2 What is your name?

Name:

Louise Ravula

3 What is your email address?

Email:

ivory@twomilliontusks.org

4 What is your organisation?

Organisation:

Two Million Tusks

Threats to these species

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

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"Common hippos are much less common than elephants – as few as 115,000 remain across their rapidly reducing range in sub-Saharan Africa. Yet more than 38,000 individual teeth, 26 tonnes of teeth by weight, 6,550 hippo tusks, almost 6,500 carvings, and various other hippo products were legally traded between countries in the 10 years to 2016 – many destined for EU Member States.

Walrus are also in demand for their ivory. Between 2007 and 2016, more than 150,000 carvings, 12,500 items of jewellery, and various other walrus items including teeth and tusks were declared to have been traded internationally.

The distinctive long helical 'tusk' of the male narwhal, which is actually an elongated canine tooth, is also coveted. More than 2,500 tusks, 2,100 carvings and various other products from these toothed whales were traded commercially between countries in the decade to 2016.

Other species such as warthogs are also targeted for their teeth, although because they are not currently classified as threatened, data on international trade is lacking.

While the international community is rightly focused on protecting elephants, we must not forget that the trade in ivory for trinkets and carvings also threatens several other species. Some UK traders have already flagged increasing interest in hippo ivory as a replacement for elephant ivory to maintain the value of some objects from which the ivory has been lost or broken, or as a means of getting around a future ban on elephant ivory."

<http://www.bornfree.org.uk/articles/ivory-bearing-species>

'Tanzania is auctioning off nearly four tons of hippopotamus teeth today, raising concerns among conservationists that legally purchased teeth may end up on the black market, where demand for hippo "ivory" is already threatening their long-term survival.'

<https://www.nationalgeographic.com/news/2018/01/wildlife-watch-hippo-teeth-auction-ivory-smuggling/eeth>

In 2014 Uganda, increasingly worried about falling hippo numbers, banned the trade in hippo teeth, which had been legal. But the wildlife authority says that since the ban the flow of hippo ivory to international markets has continued, much of it going to Hong Kong, as was the case when the trade was legal.

So far this year investigators have seized nearly 900 pounds of hippo ivory—a fraction of the total suspected illegal trade in Uganda, according to Vincent Opyene, a lawyer and the founder of the Kampala-based Natural Resource Conservation Network, which investigates wildlife trafficking in the country.'

<https://www.nationalgeographic.com/news/2016/12/wildlife-watch-hippo-teeth-trafficking-uganda/Uganda>

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

Trophy hunting, poaching, snaring, the bush-meat trade, habitat loss, and human/wildlife conflict are all additional existential threats to these species, so if they are plundered for their ivory too, the impact on them is compounded.

6 Is there any evidence of a link between the legal trade in ivory from these species and illegal wildlife trade?

Yes

Please explain and provide evidence.:

In 2017 Two Million Tusks undertook three studies regarding the sale of elephant ivory in the UK. The results were published in Ivory - The Grey Areas, which can be viewed here - <http://tiny.cc/0dv8az>

On page 6 of the report, Study 1 entitled - Testing whether auction houses provide proof of age for ivory items, we tested the following theory: auction houses only sell legal pre1947 ivory, which they are without doubt able to date/age and provide the proof of age that is legally required.

Our findings revealed: For 90% of the lots investigated, auction houses did not satisfy the legal requirement to demonstrate proof of age for pre-1947 ivory. It could therefore be reasonably suggested that similar results would be found for non elephant ivories. This is due to the same challenges sellers face in accurately ageing all ivory. It would also be reasonable to say there is a link between the legal trade in ivory from these species and the illegal wildlife trade,

During our studies we received the following guidance from the Animal & Plant Health Agency (APHA). A seller should be able to produce evidence that would be sufficient to demonstrate the age of the piece if challenged in court. The APHA comment that "...when we deal with applications for licenses to export such pieces (which are needed irrespective of age), we would not be satisfied with just a vague statement from an antique dealer that a piece dates from prior to 1947, with no justification or a specific date."

"We would ask for a specific circa date (i.e. c1920 or late 17th century) and if this is solely by the professional opinion of a specialist in the field, then a written statement should be provided; making clear how that circa date was determined and making reference to those physical characteristics of the piece in question which enabled them to make that judgement. Other documentary evidence would also be considered."

This was the clearest guidance TMT received on the criteria for what constitutes proof of age and applies by analogy to proof of age for pre-1947 ivory sold in the UK. These criteria were therefore applied during the study to assess whether an auction house had given satisfactory proof of age. (Page 7 Ivory - The Grey Areas).

A report in the Maritime Executive 14 June 2019 describes fighting the illegal trade in whale ivory, specifically whale and narwhal ivory in China. "In one case, Shenzhen customs seized over 1,400 sperm whale teeth, weighing about 96 kilos." These items are largely being imported from Africa. [http://www.maritime-executive.com/editorials/fighting-the-illegal-trade-in-whale-ivory in China](http://www.maritime-executive.com/editorials/fighting-the-illegal-trade-in-whale-ivory-in-China)

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7 Does the legal trade in ivory from these species contribute to their conservation or protection and/or does it support wider biodiversity conservation?

No

Please explain and provide evidence:

Two Million Tusks can find no evidence to support the legal trade in ivory from these species that contributes to their conservation or protection and/or support wider biodiversity conservation.

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

Please provide any evidence and any suggestions on information that is required:

There are many organisations around the world monitoring the trade in wildlife and the effects on populations.

1. Many NGO's also have people on the ground monitoring wildlife populations and working to save them from extinction. Two Million Tusks have worked with the following organisations: EIA, Born Free and Stop Ivory.

2. Greater investment is needed for the UK National Wildlife Crime Unit regional Wildlife Officers and UK Border Force, so they are able to monitor the amount of other ivories coming into and onto the market and take appropriate action. Two Million Tusks would like to see tougher deterrents and more prosecutions.

3. The development of a mobile app, containing data on all wildlife for police officers. This will enable officers to refer to up to date and current information, laws and images, enabling them to identify more accurately any items in question. The number of possible species and body parts potentially being offered for sale is huge and it is therefore impossible for individuals to know the exact laws relating to every item. This will give officers an opportunity to make more seizures and arrests when confronted with wildlife crimes.

4. Rigorous enforcement of existing laws. During our studies in 2017 there were instances when despite officers calling on auction houses to view what appeared to be illegal items for sale, the items were allowed to be sold. On page 16 of Ivory - The Grey Areas <http://tiny.cc/0dv8az> this was mentioned:

"In the Main Study there was a raw tusk and an unworked tusk within the same sale, both illegal to sell. The auction house responded to our enquiry saying "Tusk Lot x withdrawn. Possibly not legal to sell. Police say we cannot sell." The lot showed online as being withdrawn from sale. It is assumed the raw tusk was seized by the Police. However, TMT believe the unworked tusk sold for £75."

During investigations for our in-depth report Ivory: The Grey Areas. <http://tiny.cc/0dv8az> Two Million Tusks were disappointed by the lack of prosecutions after reporting instances to the Police, which we believed were evidently illegal ivory trading. TMT followed up with the Chief Inspector of the NWCU to find out what action had been taken. We did not receive a response and it is therefore assumed no action was taken.

5. Self-regulation of auction houses. On page 18 of Ivory - The Grey Areas, Other Materials are mentioned - "While TMT were investigating several lots within the

study, the auction houses changed the description of the lots. Where, for example, descriptions of lots changed from being ivory to resin or bone, they were no longer counted as ivory lots for which proof of age was needed and so have been removed from the study findings. The details can be found within Appendix 1: "...our ivory expert has been off sick this week, so we cannot confirm these are ivory, but we believe they are. This is a general auction so we offer no guarantees."

One auction house was uncertain of the material the lot was made of and consequently asked their customers for their opinions. "On discussion with customers, the consensus of opinion is that the turtle is bone and the leaf is either bone or resin and that both are of no great age."

It is concerning that not only were they unable to ascertain the material themselves, but they asked the customers and still remained uncertain as to whether the items were bone or resin (having initially described them on the-saleroom.com as ivory).'

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

Please provide any evidence and any suggestions on information that is required:

There are many challenges to assessing the numbers of wildlife alive, especially marine animals who migrate over such vast areas. There is limited data held by CITES who commission the collation of data. As and when they deem appropriate they make steps to limit trade in endangered and threatened species.

There are existing laws and restrictions in place in the South Pacific for sperm whales and orcas. In the answers to our tabua ownership survey (https://data.surveygizmo.eu/r/90013544_5d5bc259d52b71.66535825) questions 5, 6 & 7 appear to show these laws are not always known and understood by residents of Fiji (100% of respondents were of Fijian birth) and tabua are illegally crossing borders, including the UK's.

The Fijian Government announced in May 2019 they are researching the age of repatriated tabua (whales teeth) aiming to ascertain when the teeth were extracted from the whales <http://www.fbcnews.com.fj/news/environment-ministry-conducts-research-on-tabua/>. This data will be useful in identifying how many tabua are from recently deceased whales and will in turn help establish how threatening the ivory trade is to them as a species.

In April 2019 the Fijian government also announced they are liaising with UK, USA and Australian governments to repatriate tabua seized at their borders <https://fijivillage.com/news/Ministry-of-Environment-to-find-out-number-of-confiscated-Tabua-in-FijiAustralia-and-USA-boarders--r9s5k2>. This implies there are a sizeable number of tabua held by UK Border Forces. We haven't been able to determine how many there are, but it would certainly be useful to ascertain this information.

IFAW have recently started investigating the trade in hippo ivory which highlights the decline in the species. The article published in The Telegraph on 6 July 2019 further demonstrates the extensive increase in hippo ivory.

<http://www.telegraph.co.uk/news/2019/07/06/ivory-ban-killing-hippos-poachers-take-advantage-loophole-new/>

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What is non-elephant Ivory used for

10 Are there any other important or common uses of ivory from these species?

Are there any other important or common uses of ivory from these species?:

The teeth of sperm whales have for many centuries been prized possessions within Fijian and Tongan society. They are still used today in ceremonies such as weddings and are gifted upon the birth of babies, when seeking a woman's hand in marriage and they are also gifted to neighbouring villages, sometimes as many as 100 tabua at a time. The gifting and exchange of tabua is a serious business and the recipient is bound by tradition to honour an accompanying request. The tabua represents status, wealth, resourcefulness, generosity, honour, family bonds, grief, happiness and many other things. The tabua is still of immense importance in the lives of Fijian people, it is so ingrained in their identity that the strength of feeling towards the tabua should not be underestimated. More can be understood by watching this short video from the Australia Museum <http://www.youtube.com/watch?v=dmcsbZyZjo>, reading this definition on Wikipedia <https://en.wikipedia.org/wiki/Tabua> and looking at artifacts held in the Australian Museum <https://australianmuseum.net.au/learn/cultures/pacific-collection/melanesian/tabua-whale-tooth-ornaments-fiji/>

The 2011 census shows there are over 6000 people of Fijian birth living in the UK. According to a Freedom of Information request there were 1460 Fijians serving in the UK military. http://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/654147/2017-07600.pdf

The tabua retains its significance and importance to Fijians living in the UK. Two Million Tusks conducted some research (by way of a survey) to establish how many families own a tabua, how they brought the item to the UK and if they have potentially taken them across a border without the correct paperwork. The full results can be viewed in the attached report https://data.surveygizmo.eu/r/90013544_5d5bc259d52b71.66535825. The level of response to the survey was low and despite reassurances that all the data was given anonymously it was felt that the delicate subject matter deterred participants from completing the survey.

We visited the Suva National Museum in Fiji's capital and took photos of the displays about tabua. There is information about the ways in which the whale's teeth are used, treated and alternatives which have been used in the past, along with information about recent legislation restricting the buying, selling and movement of tabua. <https://photos.app.goo.gl/JLd5HHEFwtCg4rXQA>

'Other Ivories' Two Million Tusks (TMT) research 2013 - 2019

We undertook some extensive research to establish the volume and value of other ivories being sold in the UK between 2013 and 2019. Some of the findings are detailed below. Further information can be found in the attachments throughout this submission.

Walrus ivory - was extensively used for knife handles mainly in the 17th century.

26% TMT findings = 447 items consisting mainly of daggers, swords, blades, totem poles, okimono, carvings, scrimshaws, and single tusks carvings.

Hippo ivory - late 18th to early 19th century tribal uses with hand carved ceremonial Loango sticks with scenes of African tribal life i.e. hunting.

3% TMT findings = 56 items consisting of frames for clocks, mirrors, okimono and other carvings, taxidermy, daggers, scrimshaws, handles for sword and walking stick, pendant, and skulls.

Wild boar - used for taxidermy and scrimshaw, letter openers or jewellery as these tusks are very hollow with thin walls, not that suitable for cutting or carving.
1% TMT findings (only in 2019) = 8 items consisting of mainly taxidermy and tusks.

If so please provide further information and, if appropriate, indicate if any alternative material can be used:

In Fiji, historically walrus and elephant ivory have on occasions been used as a substitute to sperm whales teeth and more recently resin. Our sample survey shows that alternative materials are not particularly acceptable to Fijian people. We posed these questions within the Tabua Ownership Survey August 2019:

Would you consider using a Tabua made from an alternative material, which doesn't come from a protected species such as a sperm whale?

Response

Yes 24% No 56% Possibly 20%

What material do you think is a suitable alternative to a whales tooth?

Resin 53.8% Bone 11.5%

Wood 15.4% Ceramic 3.8%

Other 15.4%

11 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?

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.:

Continuing on from our response to Question 10 regarding traditional tabua, its significance can be seen within this article <https://www.nytimes.com/2017/04/11/world/asia/suva-fiji-tabua.html>

It is also notable that gifts of tabua have been given to Queen Elizabeth. <https://www.rct.uk/collection/60250/tabua>

The Lewis Chessmen made the news recently when a missing piece was found and auctioned in the UK for £735,000. <https://www.bbc.co.uk/news/uk-scotland-highlands-islands-48824712> Further information about this important collection can be found here - https://www.britishmuseum.org/about_us/news_and_press/statements/the_lewis_chessmen.aspx

There is an overview of the history of Inuit carvings in this article - <https://www.inuitsculptures.com/blogs/inuitart/6751746-inuit-art-history>

If so please provide further information:

As linked above.

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Global trends in the trade of non-elephant ivory

12 Is the ivory from any of these species valued in other parts of the world and why? Please provide any evidence to support your answer.

Is the ivory from any of these species valued in other parts of the world and why? Please provide any evidence to support your answer.:

The following information by Born Free highlights that ivory from other species are traded internationally and therefore valued. <http://www.bornfree.org.uk/articles/ivory-bearing-species>

"Walrus are also in demand for their ivory. Between 2007 and 2016, more than 150,000 carvings, 12,500 items of 'jewellery', and various other walrus items including teeth and tusks were declared to have been traded internationally.

The distinctive long helical 'tusk' of the male narwhal, which is actually an elongated canine tooth, is also coveted. More than 2,500 tusks, 2,100 carvings and various other products from these toothed whales were traded commercially between countries in the decade to 2016.

Other species such as warthogs are also targeted for their teeth, although because they are not currently classified as threatened, data on international trade is lacking

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13 What is the value of global trade in ivory from these species?

What is the value of global trade in ivory from these species? :

Two Million Tusks do not have any data regarding the value of global trade apart from a limited amount of data relating to the value of tabua sold overseas. Please see question 4 of our report https://data.surveygizmo.eu/r/90013544_5d5bc259d52b71.66535825

14 Do you have any evidence on if the protection of these species OR the trade in their ivory provide any economic value outside the UK? If so, please provide this evidence and also any evidence you have on any links between this value and the UK.

Do you have any evidence on if the protection of these species OR the trade in their ivory provide any economic value outside the UK? If so, please provide this evidence and also any evidence you have on any links between this value and the UK. :

Two Million Tusks extensively researched UK auction houses sales records to collate data about the volume, economic value and type of other ivories sold in the UK. We have produced the attached chart which provides data for the sales records of all other ivories between 1 January 2013 to 1 June 2019. Please also see our response to questions 15 and 16.

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Two Million Tusks 2013-19 prices of sold other ivory.pdf was uploaded

15 Does the UK play an important role in the trade of these types of ivory?

Yes

If yes, please provide evidence and any evidence you have on who the UKs major trading partners in these ivory are and the extent of this trade?:

In our other ivory research, we sampled the following auction houses and found them to be selling at some point other ivories over the last 5 years. 1 January 2013 – 30 June 2019.

Auction Houses sampled

25 Blythe Road
Adam Partridge
Amersham Auctions
Anderson Garland
Andrew Hilditch & Son
Andrew Smith & son
Anthony Cribb Ltd
Arthur Johnson & Sons
Bamford's
Bateman's Auctioneers & Valuers
Bearnese Hampton & Littlewood
Bellmans Auctioneers
Bentley's Auction Rooms
Bishop & Miller
Bolton Auction rooms
Bonham's
Bourne End Auction Rooms
Brentwood Antique Auctions
Brettells Auctioneer & Valuers
Bridport Auctions
Brightwells
British Bespoke Auctions
Bulstrodes
Burstow & Hewett
Byrne's Auctioneers & Valuers
C & T Auctioneers and Valuers Ltd
Canterbury Auction Galleries
Cato Crane
Chalkwell Auctions
Charles Miller
Charterhouse
Cheffins
Chiswick Auctions
Chorley's
Christies
Clarke & Simpson
Clarke's Auctions at Semley
Clevedon Salerooms Ltd
Cooper Barrington LLP
Criterion Auctioneers
Crow's Auction Gallery
David Duggleby Auctioneers
David Lay

Dickins Auctioneers
Dix Noonan Webb
Dominic Winter
Dreweatts 1759
Duchy Auction Company Limited
Duggleby Stephenson of York
Duke's
East Bristol Auctions
Eastbourne Auctions
Eldreds Auctioneers and Valuers
Elstob & Elstob
Ewbank's
Featonbury's Auctioneers & valuers
Fellow's
Fieldings Auctioneers
Flint's Auctions
Gavin Gardiner Limited
Gerrards
Gildings Auctioneers
Golding Young & Mawer
Gorrings
Grand Auctions
Great Western Auctions
Halls Fine Art
Hampstead Auctions
Hannam's
Hanson's
Hanson's Auctioneers & valuers
Hartleys Auctioneers and Valuers
Hawleys Auctionees & Valuers
Heliers Auctions
Henry Aldridge & Sons
Holts Auctioneers
Humbert & Ellis
Huntly Auctions
Hutchington Scott
J.S Fine Art
JF Daughters
John Nicholson's
Jones & Jacob
Kent Auction Galleries Ltd.
Kidson-Twigg
Kingham & Orme
Laidlaw Auctioneers
Lawrences Auctioneers of Crewkerne
Lawrences of Bletchingly
Littleton Auctions
London Auctions
Lyon & Turnbull
Ma San Auction Ltd
Mallam's
Martyn Rowe
Matthew Barton Ltd
McTears
Morphets of Harrogate
Nicholas Mellor's
Penrith Farmers Kidd
Piers Motley Auctions
Ramsay Cornish
Reeman Dansie
Rosebery's
Rowleys Fine Art
Sanctum Auctions
Semley Auctioneers
Sotheby's
Special Auction Services
Stride & Son
Stroud Auctions Ltd
Summers Place Auctions

Sutton Hill Farm Country Auctions
Swan Fine Art
Sworders Fine Art Auctioneers
Taylors Auction Rooms
Tennant's
The Pedestal
Thomas Del Mar Ltd
Thomas Watson
Timeline
Toovey's
W & H Peacock
Wallis & Wallis
Warren & Wignall
Wellers Auctioneers
Whittons Auctioneers
Wilkinson's
Willingham Auctions
Woolley & Wallis
Wright Marshall Ltd

Methodology:

Other ivories research

These monitoring and research tasks were performed to gain knowledge of the amount of 'other ivory' sold online over a set time period. 2013 was chosen as a starting point. This enabled us to ascertain whether there was any noticeable increase in the volume of other ivories sold because this provided an overview of almost 5 years of sales before the UK ivory ban consultation began. Two Million Tusks included items which came up by searching for other ivories from online sales on the following platforms:

the-saleroom.com invaluable.com and www.barnebys.co.uk

These are online auction websites, allowing customers the opportunity to bid online during live auctions, taking place in auction houses around the UK and internationally. They are used for the sale of antiques, fine art and general auction house sales.

It was not always possible to obtain sold prices of each lot, so there are some gaps in the data, which are referenced as N/A in the spreadsheet attached entitled TMT Other Ivories Research, within the Sales Data tab.

We visited auction house websites, researched and documented all the other ivories sales between 1 January 2013 and 30 June 2019. All the sales were documented using the titles: auction house (AH), sale date, description, ivory description, species, estimate (if given) and hammer price if available.

There are instances of 'passed' lots being offered for sale multiple times. The possibility of items previously sold also being reoffered for sale at the same or other auction houses due to the original sale not being completed. If the reader would like to filter out these duplicate listings it is possible to do this within the spreadsheet. As presented the research is a sample of lots from different auction houses over the specified time period.

The following search terms were used: hippopotamus, hippo, hornbill, mammoth, marine ivory, walrus, narwhal, warthog, whale, sperm whale and orca. This was sometimes prefixed with tusk and tooth. Initially we also searched for scrimshaw however this generated excessive results, including many other mediums such as wood. Whalebone also brought up many silver teaspoons with whalebone handles, therefore along with scrimshaw these results were omitted.

The study commenced following a discussion with DEFRA and prior to the Call for Evidence publication. We subsequently included hornbill within the search parameters as hornbill is also considered to be an ivory, we felt it would still be useful to include these findings.

Once the Call for Evidence was published and the species list was available, it became apparent that auction house descriptions are often vague and ambiguous. Examples are included in the spreadsheet under 'Unsure'. These include many 'possibly' and 'probably' also, in one case, 'Mammoth or Walrus'. It is clear that since the publication of our report 'Ivory – The Grey Areas', auction houses have not changed the way in which they identify, research, list and sell ivory.

The antique trade should be able to distinguish between species. A quick check online via a search engine brings up the CITES guide to ivories last updated in 1999, plenty of time for the trade to be far more aware of what they are selling. In recent times courses have been held by the Antiques Trade Gazette and BADA offering guidance on CITES and ivory. There is a responsibility and a duty of care by the auction houses to be able to identify the items they are selling. There are few retail outlets that would employ a sales person who is unable to distinguish the material of the item they are selling, after all would anyone wish to shop in a department store where the assistants couldn't tell the difference between the size of a dress or the material it were made from?

The term 'marine ivory' is used to include many species and formed 39% of the results. Only a few items had the actual species mentioned in the description. When these were available they were listed under that species, rather than marine. Ambiguous descriptions are also used by the antique trade such as 'ivory or bone' again a simple search gives guidance - <https://difference.guru/difference-between-ivory-and-bone/>.

Trading Standards - False Descriptions

There are laws and regulations concerning trade descriptions and misleading advertising. All traders are duty bound by these regulations, not only legally but there should also be, without question, a moral obligation and responsibility to the public they are selling to.

*The Consumer Protection from Unfair Trading Regulations 2008 (CPRs) prohibits traders from misleading consumers by falsely describing goods and services.

The CPRs also prohibit traders hiding information, giving insufficient information or giving information in an unclear manner about goods or services.
<https://www.businesscompanion.info/en/quick-guides/good-practice/accurate-descriptions>

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Two Million Tusks 2013-19 AH sales of other ivories UK.xlsx was uploaded

Domestic Market

16 Do you have any evidence on the financial value of items made of or containing ivory from these species in the UK? This evidence could include, for example average prices or the highest and lowest prices.

Do you have any evidence on the financial value of items made of or containing ivory from these species in the UK? This evidence could include, for example average prices or the highest and lowest prices. :

Please refer to the attached Two Million Tusks spreadsheet 2013-2019, under the heading Analysis and Prices. The evidence shows narwhal ivory is financially the most valuable and whale ivory is the second most valuable.

17 Do you have any evidence on how common these items are in the UK? For example, do you have any evidence to demonstrate how often they are sold or how many items are owned by individuals or organisations

Do you have any evidence on how common these items are in the UK? For example, do you have any evidence to demonstrate how often they are sold or how many items are owned by individuals or organisations:

Data collected from a sample of auction house sales - 1 January 2013 to 30 June 2019 is available on the attached spreadsheet.

This data demonstrates the significant number of animals harvested for the ivory trade. Our data highlights the fact that walrus are also at risk, according to our research, largely due to the large volume of walrus items in comparison to other ivories.

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Two Million Tusks 2013-19 AH sales of other ivories UK.xlsx was uploaded

18 Are there any businesses in the UK that specialise in ivory from these species?

Yes

If yes, how many :

Some of this information is available on our spreadsheet 'Two Million Tusks 2013-19 Auction House sales of other ivories UK'.

If yes, what is their income:

The total value of the ivory sold within our 5 year study by UK Auction Houses is £1,785,322. This is the total from the websites we looked at and is not exhaustive and the actual value for all sales during this time period. It could be considered to be somewhat higher, especially if antique shops and small private sellers on sites such as eBay and Facebook Marketplace were also included.

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

19 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.

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Australia treats whales as an Appendix 1 species. "The Australian Authorities have notified all parties that under the Convention, Australia will not be able to permit the import of 'tabua' through its borders if it is non-compliant. As a result a number of 'tabuas' are now being withheld at their borders due to authenticity issues. According to the convention website Australia implements stricter domestic measures that treat all whales and dolphins as though they are listed on Appendix One, which is a restricted listing of species."

<https://www.fijione.tv/news-posts/any-trade-or-exchange-of-tabua-will-require-approval-of-the-ps-itaukei-affairs-wycliffe/>

Under New Zealand's Trade in Endangered Species Act, artefacts like tabua need an export permit to be brought into the country.

<https://www.rnz.co.nz/international/pacific-news/324289/pacific-travellers-warned-of-need-for-permits-for-tabua>

Fiji banned the sale of tabua (Fiji Times February 3 2015 <https://photos.app.goo.gl/JLd5HHEFwtCg4rXQA> Suva National Museum) outside of the Ministry of the Environment, but it can be seen in the article from the New York Times that people are openly buying and selling tabua in the markets. Conversations with Fijians currently living in Fiji found there is a thriving black market and the results of the Two Million Tusks survey show that there is a wide lack of awareness of the Fijian rules and the laws overseas. It has been found that people are travelling without the necessary paperwork and they regularly do not declare the tabua when entering and leaving countries. https://data.surveygizmo.eu/r/90013544_5d5bc259d52b71.66535825

Mammoth ivory is legal and poses a new crisis for elephants:

<https://www.nationalgeographic.com/news/2016/08/wildlife-woolly-mammoth-ivory-trade-legal-china-african-elephant-poaching/>

Mammoth ivory demand and some countries possible restrictions:

An investigative report in January 2011 revealed that researchers in Guangzhou, the largest city in southern China counted 6,541 mammoth ivory items, mostly in speciality shops. Considering there were 6,437 ivory objects (not mammoth) that were also displayed for retail sale in the same city, alarmingly highlights the popularity of mammoth ivory. Since the Chinese ivory ban in December 2017 it stands to reason that mammoth ivory will now be even more desirable, but also leading open the opportunity of elephant ivory being disguised as mammoth.
http://www.rhinoresourcecenter.com/pdf_files/131/1316403533.pdf

May 2019 an article states: Tel Aviv wants to prevent elephant tusks being sold as mammoth ones globally. "Studies have found that there has been a fourfold increase in the trade of mammoth ivory between 2004 and 2015. The major exporter of mammoth ivory is Russia and the main importer is China.

Mammoth ivory is a big commercial business. It is legal to trade in mammoth ivory, except in India, where the Supreme Court banned its trade in 2003.

The major legal exporter of mammoth tusks is Russia. Mammoth tusk imports via Hong Kong, one of the main trade routes into mainland China, have greatly expanded from an average of less than 9 tonnes per year from 2000 to 2003 to an average of 31 tonnes per year from 2007 to 2013, the proposal says, quoting studies.

Wholesale prices of mammoth ivory tusks too have increased greatly recently due to the rise in demand in China. For example, in 2010, the wholesale price for the top grades A and B of raw mammoth ivory, averaged together, was US \$ 350/kg, while in 2014, comparable high-quality tusks were US \$ 1,900/kg on average, according to prices paid by some factories in Beijing. On the face of it, the use of mammoth ivory seems to be a boon for elephants, saving them from poaching. But that doesn't seem to actually be the case.

"The issue we have raised in our proposal is the problem that the legal, unregulated trade in mammoth ivory facilitates illegal trade in elephant ivory," Israel has told the CoP through its proposal. Studies have found evidence of elephant ivory being sold as mammoth ivory. There are visible differences in size and structure of elephant and mammoth ivory. Another point of difference is the Schreger lines.

Schreger lines are visual artifacts that are evident in the cross-sections of ivory. They are commonly referred to as cross-hatchings, engine turnings, or stacked chevrons. In the case of mammoth ivory, these lines run through at a 90-degree angle while in elephant ivory, they run at a 115-degree angle. The problem is that the two are not easily distinguishable, especially when the pieces are small and carved upon.

"A recent study published by TRAFFIC on the US ivory market also provides examples of actual cases in the USA where elephant ivory was sold under the claim that it was mammoth ivory, such as a felony conviction in New York of a Manhattan-based antiques merchant for intentionally mislabeling illegal elephant ivory as 'carved mammoth tusks'," the proposal says. Studies have also found that dealers in Macau were deliberately mislabeling elephant ivory as mammoth ivory.

Given how unregulated trade can negatively impact elephant conservation, Israel wants to list Woolly Mammoth in Appendix II of CITES. This will, according to Israel, lead to better regulation and documentation of mammoth ivory, preventing elephant ivory's sale as mammoths.

As there are no provisions under CITES to list an extinct species, Israel wants to list the species under the "look alike criterion", ie listing a non-endangered species under the appendices as unregulated trade in the species will harm an identical or similar species which is endangered.'

<https://www.downtoearth.org.in/news/wildlife-biodiversity/israel-moots-proposal-to-regulate-trade-in-mammoth-ivory-64493>

In 2017 Russia exported 72 tons of mammoth ivory of which over 80% went to China.

Yakutia has at least \$550,000 worth of mammoth ivory buried in its melting ice, also known as 'ice Ivory'.

'Yakutia governor Aisen Nikolayev said he hoped the bill regulating tusk collectors would be finally passed in 2019, though he acknowledged "there is some resistance" to it. Without a national law classifying mammoth ivory as a special natural resource, the trade remains in a "grey zone," he said.

For someone in Yakutia, however, it's a source of pride that the region helps stop the hunting of elephants for tusks. "Our dead bones are saving living elephants," said Nogovitsyn (a local) "Being able to gather them is both important for us and for Africa".'

Mammoth ivory is sold illegally with ivory, as highlighted in a recent report by AFP 1917.

<https://phys.org/news/2019-01-siberia-chinese-demand-prehistoric-tusks.html>

In New York antique dealers were charged with the illegal sale of ivory worth \$4.5 million which was being passed off as mammoth ivory.

<https://www.nytimes.com/2016/09/23/nyregion/antiques-dealers-charged-in-illegal-sale-of-ivory-priced-at-4-5-million.html>

<https://www.bbc.co.uk/news/uk-scotland-edinburgh-east-fife-46649010> BBC story on WildGene Zoological Society of Scotland found mammoth ivory in ivory trinkets.

An Australian company called Mineshaft sells a considerable amount of mammoth ivory items and TMT have been sent these photographs (zip file attached) by a visitor to the shop, to demonstrate the quantity and various types of items carved from the ivory. Could a buyer be absolutely confident he is buying mammoth ivory and could a non-specialist really distinguish between mammoth and elephant ivory? There shop can be viewed here
<http://mineshaft.com.au/collectables/woolly-mammoth-ivory-carvings/>

How to accurately tell the difference between elephant ivory and mammoth - Schreger lines:

'A photocopy machine is used to capture Schreger angles from mammoth and elephant ivory cross- sections. The cross-section is placed on the glass plate of a photocopy machine. A blue photocopy.1 Schreger lines in proboscidean dentine were described by the German anatomist Bernhard Gottlob Schreger in 1800 (Obermayer 1881) and should not be confused with Hunter-Schreger bands in enamel. A transparency sheet may be placed between the object and the glass plate to enhance the detail of the photocopy. Enlargement of the photocopy may also improve the image and facilitate the measurement process.

After a photocopy of the ivory cross-section has been obtained, Schreger angles may be marked and measured. Use a pen or pencil and a ruler to mark and extend selected outer Schreger angle lines. NOTE: Only outer Schreger angles should be used in this test. Once the angles have been marked and extended, a

protractor is used to obtain an angle measurement. Several angles, including both concave and convex angles, should be marked and measured. Once the angles have been marked and measured, calculate the angle average. The angle average can then be compared to the data base in Figures 10 and 11.

Figures 10 and 11 show the angle data obtained in the study of the outer Schreger pattern of 26 cross-sections of elephant ivory (*Laxodonta africana* and *Elephas maximus*) and 26 cross-sections of mammoth ivory (*Mammuthus primigenus*). Five concave and five convex angles were measured on each of these 52 samples. The distribution of all 520 of these angles is presented in Figure 10. This figure shows that between 90 degrees and 115 degrees an overlap exists in the lower end of the elephant concave angle range and the upper end of the mammoth concave/convex angle range. Because specimens from both extinct and extant sources may present angles between 90 degrees and 115 degrees in the outer Schreger pattern area, the differentiation of mammoth from elephant ivory should never be based upon single angle measurements when the angles fall in this range.

The distribution of the averages (means) of the concave and convex outer angles from the 52 samples of elephant and extinct proboscidean ivory is presented in Figure 11. When the averages are used to represent the angles in the individual samples, a clear separation between extinct and extant proboscideans is observed. All the elephant samples had averages above 100 degrees, and all the extinct proboscideans had angle averages below 100 degrees.¹
<https://www.cites.org/sites/default/files/eng/resources/pub/E-Ivory-guide.pdf>

"Tusks from the giant animals appear identical to elephant ivory, apart from tiny markings and faint colours that can be identified by specialists. Indeed, more than 50 percent of ivory sold into China is thought to be mammoth tusks."
<https://www.telegraph.co.uk/news/2017/05/02/booming-trade-mammoth-ivory-fuels-fears-elephants>

File Upload (if needed):

Mammoth Ivory copy (1).zip was uploaded

Consultee Feedback on the Online Survey

20 Overall, how satisfied are you with our online consultation tool?

Very satisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

Question 14 is poorly worded and doesn't make sense.