

# TRAFFIC REPORT

## A RAPID SURVEY OF UK IVORY MARKETS

AUGUST 2016

*Lau, W., Crook, V., Musing, L., Guan, J. and Xu, L.*





## TRAFFIC REPORT

TRAFFIC, the wildlife trade monitoring network, is the leading non-governmental organization working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development. TRAFFIC is a strategic alliance of WWF and IUCN.

Reproduction of material appearing in this report requires written permission from the publisher.

The designation of geographical entities in this publication, and the presentation of the material, do not imply the expression of any opinion whatsoever on the part of TRAFFIC or its supporting organizations concerning the legal status of any country, territory, or area, or its authorities, or concerning the delimitation of its frontiers or boundaries.

The views of the authors expressed in this publication are those of the writers and do not necessarily reflect those of TRAFFIC, WWF or IUCN.

Published by TRAFFIC.

David Attenborough Building, Pembroke Street, Cambridge CB2 3QZ, UK.

© TRAFFIC 2016. Copyright of material published in this report is vested in TRAFFIC.

ISBN no: 978-1-85850-406-3

UK Registered Charity No. 1076722

### Suggested citation:

Lau, W., Crook, V., Musing, L., Guan, J. and Xu, L. (2016) *A rapid survey of UK ivory markets*. TRAFFIC, Cambridge, UK.

This is the original English version of *A rapid survey of UK ivory markets*. A Chinese translation is also available.

### Design:

ADB Design Studio, Beijing  
jihuatang99@163.com

Front cover photograph and credit:  
Ivory items for sale in London antiques markets ©TRAFFIC

# A RAPID SURVEY OF UK IVORY MARKETS

*Lau, W., Crook, V., Musing, L., Guan, J. and Xu, L.*





# TABLE OF CONTENTS

---

Acknowledgements	vi
Executive summary	vii
Introduction	1
Legislation controlling commercial ivory trade in the EU and UK	4
Methods	6
Physical market surveys	6
Online surveys	10
CITES trade data	11
Seizure data	12
Results	14
Physical market survey results	14
Individual market/area results	14
Product types and prices	17
Additional information on the UK ivory market collected from traders	18
Online survey findings	20
Number of ivory items for sale online	20
Product types	21
Prices	21

Declarations concerning age, provenance and legality	22
CITES trade in ivory: re-exports and imports	24
Re-export of ivory from the UK	24
Import of ivory into the UK	25
EU and UK re-exports and imports of ivory	26
Discrepancies in UK trade according to importer and exporter data	27
UK ivory seizures	29
Discussion and conclusions	31
Recommendations	34
References	35
Appendix 1. Number of outlets and ivory items per outlet	37
Appendix 2. Quantities and prices by type of ivory items	39
Appendix 3. Survey results of antique auctions websites	41
Appendix 4. Survey results of online antique marketplaces	42

## ABBREVIATIONS AND ACRONYMS

CITES.....	Convention on International Trade in Endangered Species of Wild Fauna and Flora
COTES.....	Control of Trade in Endangered Species (Enforcement) Regulations
Defra.....	Department for Environment, Food and Rural Affairs
ETIS.....	Elephant Trade Information System
EU.....	European Union
EU-TWIX.....	European Union – Trade in Wildlife Information eXchange
GBP.....	British Pound
RIE.....	Raw Ivory Equivalents
UK.....	United Kingdom
UK CITES MA.....	CITES Management Authority of the United Kingdom
USA.....	United States of America

## ACKNOWLEDGEMENTS

The authors thank TRAFFIC colleagues, especially Katalin Kecse-Nagy, Sabri Zain, Stephanie Pendry, Rachel Kramer, Tom Milliken, Yannick Kuehl, Steven Broad, Richard Thomas and Julie Gray for the ongoing support provided and for their reviews. The authors also thank Wang Haibin and Shi Kun for external expert reviews and several staff from the UK CITES Management and Enforcement authorities for information provided on legislation, online surveys of wildlife trade and current enforcement measures in place.

China CITES Management Authority is gratefully thanked for financial support of this study and the Rufford Foundation is gratefully acknowledged for its contribution towards the final stages of production of this report.



# EXECUTIVE SUMMARY

The African Elephant *Loxodonta africana* and Asian Elephant *Elephas maximus* have been listed in the Appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) since 1976 and 1975, respectively. Commercial international trade in ivory is generally not permitted, however in accordance with CITES and European Union (EU) regulations, commercial trade of antique ivory (“worked<sup>1</sup>” specimens acquired before 3rd March 1947) and “raw<sup>2</sup>” or “worked” pre-Convention<sup>3</sup> ivory is possible under certain prescribed conditions.

Despite international control measures, legal trade in (antique) ivory, as well as elephant poaching and illegal ivory trade, have been rising in the past decade, with the most significant increases observed from 2007 onwards. This has led to calls for countries to implement stricter domestic measures going beyond the requirements of CITES, and to take additional deterrent actions to address illegal ivory trade. Much of the focus around recent elephant poaching and illegal ivory trade has been on African range States and Asian consumer markets, however, there have been indications that changes are also occurring in European markets. In 2014, a study on ivory trade in the EU found that legal commercial re-exports of pre-Convention ivory products, and re-exports of both worked and raw ivory from the EU, have increased in recent years, particularly since 2007.

Historically, the United Kingdom (UK) had one of the largest ivory markets in the world. The popularity of ivory products peaked in the 19th and early 20th century, with annual ivory imports of up to 500 tonnes between 1910 and 1914. Much of the imported ivory was made into decorative items and household and personal objects. These ivory items are now considered antiques, and in 2004, when the UK ivory market was last surveyed by Martin and Stiles (2005), large quantities of ivory antiques were being offered for sale. Despite evidence confirming the considerable availability of ivory in the UK market in 2004, there is a lack of information regarding the current status of the market and therefore the potential link with the surge in both legal and illegal global ivory trade in recent years.

This report presents a rapid assessment of the current commercial UK ivory market, with a focus on the antiques sector. Using the survey by Martin and Stiles as a comparative baseline, physical markets and selected shops in London where ivory was found in 2004 were revisited and surveyed. Online offers for sale on UK-based antique and auction websites were also researched, to complement the physical market survey results. In addition, CITES trade data on import and re-export of ivory from the UK/EU during 2005 and 2014, and reports of ivory seizures involving the UK from the Elephant Trade Information System (ETIS) and EU-TWIX<sup>4</sup> were briefly analysed to provide context with regards to the UK’s current role in international ivory trade. Furthermore, available literature and guidance on relevant legislation, together with information collected from consultation with UK CITES authorities, was reviewed.

Physical and online market surveys in April 2016 confirmed the ongoing availability of antique ivory in the UK market. No new or raw (“unworked”) ivory was seen in any of the physical market outlets or online platforms—only one ivory item seen for sale was reportedly from after the legal cut-off (1947) for antique ivory being sold without CITES documentation within the EU. Antique ivory items were available across all 13 antiques markets and in the two areas of antiques shops surveyed. A wide range of ivory items were being offered for sale including figures (56%), household goods (27%), jewellery (9%) and personal items (8%); similar ivory items were found for sale/auction online.

---

<sup>1</sup> “Worked ivory” includes items defined as carvings in the CITES Trade Database.

<sup>2</sup> “Raw ivory” includes items defined as tusks, ivory pieces and ivory scraps in the CITES Trade Database.

<sup>3</sup> Items acquired before the date on which CITES or the EU Wildlife Trade Regulations became applicable to them in the country in which they were acquired.

<sup>4</sup> European Union – Trade in Wildlife Information eXchange—the system includes a database of CITES seizures in the EU (<http://eu-twix.org/>)

Compared to 2004, fewer individual market stalls in London were offering ivory for sale in 2016, declining, from ~640 stalls in 2004 to 200 in 2016. The total number of ivory items for sale had also declined, from ~6,000 items in 2004 to 3,200 in 2016. It is important to note that the surveys conducted in 2004 and 2016 were not identical due to various unavoidable factors, and comparisons must be made with caution. Although the reasons behind the apparent decline in the number of ivory items being offered for sale in London's physical antiques markets between the 2004 and 2016 surveys are unknown, possibilities could include the emergence of online sales and/or stricter legislation which, according to traders, has led to reduced prices and demand for ivory items.

In 2004, buyers of ivory antiques at London's physical markets were dominated by American and European tourists, but in 2016 traders reported that travellers/citizens from East Asian countries/territories (including mainland China, Japan and Hong Kong) are increasingly purchasing ivory in the UK. According to ivory dealers, the craftsmanship, style of carving and the era and/or provenance of antiquity were considered the primary indicators of quality and value in the UK's antiques products, rather than the material the item was composed of. Correspondingly, there was little difference in price between products made with ivory or other materials.

Traders had a variable understanding of what constitutes legal sale and trade of ivory, however awareness of a specific cut-off date for the legal commercial use of antique ivory in the UK/EU was unanimous. Many traders were aware of the existence of trade controls in other countries, such as stricter rules in the United States of America (USA) and mainland China for importing ivory. High end dealers were generally very knowledgeable regarding the national and international legislation and specific requirements for trade pertaining to ivory, however casual/opportunistic traders were less knowledgeable and took a more fluid stance on the need for documentation. Several dealers suggested transporting ivory items in personal luggage or sending them by post, without any documentation. Few dealers were able to provide proof of age or documentation to prove legal acquisition, although some of the antiques websites surveyed require the approximate date of manufacture to be provided for each ivory product advertised.

According to CITES exporter data, the UK was a net (re-)exporter of ivory for commercial purposes over the last decade: 990 kg and ~54,000 specimens of ivory were re-exported for commercial purposes between 2005 and 2014. In total, the UK's re-exports of commercial ivory made up 31% of the total EU re-exports during this period. The majority of commercial trade reported by the UK for 2005–2014 was in worked ivory (carvings), with only 2% involving raw ivory. However, importers reported a much higher number of raw ivory items in trade from the UK (for example, 109 tusks reported by importers versus 17 tusks reported by the UK); according to stricter UK domestic measures, only worked specimens (antique or pre-Convention) can be legally re-exported for commercial purposes, and therefore it would be essential to clarify the reasons for these discrepancies.

Seizure data also show that the UK plays a role in illegal ivory trade, at both import and re-export, but in particular as a transit country, with ivory seizures reported by the UK having increased in recent years. Although the physical and online market surveys carried out for this study did not find any new ivory for sale or clear indications of illegal activity, a number of traders and buyers indicated their knowledge/intention of taking antique ivory items out of the EU without the necessary documentation, and hence illegally. Lack of awareness and/or clarity over the UK's and destination countries' regulations on ivory trade and the specifics surrounding the antiques (pre-1947) derogation under the EU Wildlife Trade Regulations, appear to play a major role in this.

The report concludes with a number of recommendations:

The UK CITES Management and Enforcement authorities are encouraged to:

- Compile simple information/guidance on the current and planned/upcoming legislation and documentation requirements, definitions/examples of “worked” antique specimens, burden of proof and best practice related to commercial antique ivory use and trade in the UK, and specific domestic measures in important previous/current destinations for antique ivory sourced in the UK, such as the USA and China
- Share this information/guidance via the UK CITES MA website in addition to information sources regularly used by antique dealers and auction houses, such as the Antiques Trade Gazette
- Raise awareness of tourists, in collaboration with CITES authorities in destination countries/territories, regarding rules for purchasing ivory in the UK and its transportation across borders, through tour operators and airlines and targeted signage in relevant airport terminals
- Explore the possibility of making declarations regarding the age and acquisition of all ivory items, both on websites and in physical stalls/shops, mandatory in the UK
- Continue to target ivory-related Customs inspections on shipments in postal and courier services destined for East Asia and luggage of those travelling to the region, and consider extending this targeting to other previously important destinations for ivory sourced in the UK, such as the USA
- Research and clarify the discrepancies between importer/exporter-reported CITES trade of ivory (raw ivory in particular) from the UK over the last decade

The UK CITES Management and Enforcement authorities, in collaboration with authorities in other EU Member States and other experts such as university researchers and non-governmental organizations, are encouraged to:

- Fund and plan regular, systematic and comprehensive market monitoring of all types of ivory on offer for sale, including antique, pre-Convention and new, both in the UK and other EU Member States
- Continue to monitor online sales of ivory in the UK and carry out an assessment of the ivory trade on social media platforms in the UK and the EU to determine if trade in ivory is prevalent on these platforms
- Strengthen co-operation with e-commerce companies to research and develop innovative ways to prevent illegal online trade in ivory and other endangered species in the future.



# INTRODUCTION

Wildlife crime has become one of the largest and most profitable transnational organized criminal activities in recent years, and represents a significant threat to the Earth's biodiversity (Milliken *et al.*, 2012; European Commission, 2016a). National and international awareness of the widespread impacts of wildlife crime have evolved rapidly over recent years, in particular for iconic and keystone species such as elephants (Sollund and Maher, 2015; European Commission, 2016a). Both the African Elephant *Loxodonta africana* and the Asian Elephant *Elephas maximus* have been subject to poaching for their ivory<sup>5</sup> to meet demand for national and international trade causing major population declines across their ranges (Blanc, 2008; Choudhury *et al.* 2008; CITES, 2015). Poaching and illicit trade in elephant ivory have reached their highest levels since the mid-1990s, with particular increases seen since 2007, which have generally been attributed to growing demand in Asian markets (Milliken *et al.*, 2012; UNEP *et al.*, 2013).

The African Elephant has been listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) since 1977. The species was transferred from Appendix II to Appendix I in 1989, however, some populations were down-listed to Appendix II, under a set of conditions, in 1997 (Botswana, Namibia and Zimbabwe) and 2000 (South Africa) (UNEP *et al.*, 2013). The Asian Elephant has been listed in CITES Appendix I since 1976. This means that, in general, commercial international trade in ivory is not possible. In line with CITES, trade in ivory is strictly regulated within the single market of the European Union (EU) through provisions of the EU Wildlife Trade Regulations which are directly applicable to trade to, from and within all EU Member States, including the United Kingdom (UK)<sup>6</sup>. According to the relevant EU regulations, commercial trade in ivory is permitted under prescribed conditions for antique ivory ("worked" specimens acquired before 3rd March 1947) and pre-Convention<sup>8</sup> ivory ("raw" or "worked" items acquired before the date on which CITES or the EU Wildlife Trade Regulations became applicable in the country in which they were acquired).

In response to a recent surge in illegal ivory trade, several countries have implemented stricter domestic measures, going further than the requirements of CITES. For example, on 26th February 2015, China imposed a one year ban on the import of African Elephant ivory carvings (not including pre-Convention items) and on 15th October another one year ban on the import of African Elephant tusk hunting trophies. Even stricter controls were brought in on 20th March 2016 (State Forestry Administration Bulletin No. 3, 2016), when China suspended the import of elephant tusks and ivory carvings (including pre-Convention tusks and other ivory products, and tusks obtained in Africa as hunting trophies) from 20th March 2016 to 31st December 2019 (CITES, 2016). On 2nd June 2016, the United States of America (USA) adopted new regulations on domestic trade in ivory under which commercial exports and sales of ivory between US States are only allowed for proven antiques more than 100

---

<sup>5</sup> All references to the term "ivory" in this report refer to elephant ivory, unless otherwise specified.

<sup>6</sup> At the time of conducting the survey, the UK was a member of the EU and all research was conducted before the 23rd June 2016 referendum on EU membership in the UK. The fact that the UK voted to leave the EU could have implications on the current legislation controlling trade in ivory and future ivory markets, however this was not considered in more detail here due to the many unknowns at present.

<sup>7</sup> "Worked ivory" includes items defined as carvings in the CITES Trade Database, see legislation section for full definition.

<sup>8</sup> Items acquired before the date on which CITES or the EU Wildlife Trade Regulations became applicable to them in the country in which they were acquired.

<sup>9</sup> "Raw ivory" includes items defined as tusks, ivory pieces and ivory scraps in the CITES Trade Database.

years old (USFWS, 2016). US regulations preventing commercial imports of ivory and trade in raw ivory were already in place (USFWS, 2016). In June 2016, the Hong Kong Government proposed plans to phase out domestic ivory trade within a five-year period, as well as bans on the import and re-export of pre-Convention ivory into the territory (Environment Bureau/AFCD, 2016).

Several EU Member States including France and Germany have adopted stricter measures in relation to ivory trade and no longer issue re-export certificates for pre-Convention raw ivory. In February 2016, the EU published the EU Action Plan against Wildlife Trafficking, which provides a comprehensive framework for joined-up efforts to fight wildlife crime inside the EU, and for strengthening the EU's role in the global fight against illegal wildlife trade (European Commission, 2016b). Action 2 of the EU Action Plan "Further limit trade in ivory within and from the EU" aims to ensure that "Member States do not issue export and re-export documents for raw pre-Convention ivory" (European Commission, 2016b) by the end of 2016 through the issuance of Commission guidelines. The guidelines also aim to provide well defined criteria to regulate intra-EU trade in antique ivory further.

Research on and discussions around recent elephant poaching and illegal ivory trade have focused mainly on African range States and Asian consumer markets, with little attention paid to European countries. However, there have been indications that changes are also occurring in European markets. Legal commercial exports of pre-Convention ivory products from the EU have shown an increase in recent years, especially since 2007, based on numbers of trade records in the CITES trade database during the period 2003 to 2012 (Mundy, 2014). Increases in re-exports of both worked ivory (carvings) and raw ivory (tusks, ivory pieces, ivory scraps) from the EU have been observed, with re-exports of tusks showing a particularly pronounced upward trend after 2007 (Mundy, 2014). Of note is the fact that mainland China and Hong Kong were reported as the main destinations of pre-Convention/antique ivory in recent years since 2007 (Mundy, 2014).

The Elephant Trade Information System (ETIS)<sup>10</sup> analyses carried out for CITES Conference of the Parties (CoP) include a "cluster analysis" which identifies those countries or territories most prominently implicated in illegal trade in ivory. In the cluster analysis, data are pre-screened to separate out those countries only marginally implicated in ivory seizures, while other countries or territories which show similar patterns in terms of their seizure data are grouped together. The characteristics of these groupings are then described to understand underlying trade dynamics and factors, including effective law enforcement. The UK has featured in six successive cluster analyses since the first such analysis was carried out in 2002, suggesting that the UK has consistently played a role in illegal ivory trade globally (CITES Secretariat, 2013).

The UK historically had one of the largest elephant ivory markets in the world. Ivory carving in the UK commenced in the 10th century (Woodhouse, 1976) and ivory was in widespread use in religious and decorative art from the 11th century onwards (Williamson, 2011). The

---

<sup>10</sup> ETIS is one of the two formal monitoring systems for elephants under CITES; ETIS, which is managed by TRAFFIC, is a comprehensive information system to track illegal trade in ivory and other elephant products (<https://cites.org/eng/prog/etis/index.php>)

production and use of ivory in the UK reached a peak between 1800 and 1914 (after which there has been a steady ongoing decline), with ivory imports into the UK quadrupling from an average of 112 tonnes a year from 1814 to 1820 to 496 tonnes annually from 1910 to 1914 (Martin, 2001). During this period, in addition to more traditional decorative uses, ivory was increasingly chosen as a medium for utilitarian household and personal objects such as brush, cutlery and walking stick handles, tea caddies, paper knives, rulers, boxes, piano keys and jewellery (Martin and Stiles, 2005).

In 2004, Martin and Stiles (2005) carried out a comprehensive market survey of European ivory markets, including the UK. This was the fourth in a series of surveys depicting the status of and trends within elephant ivory markets in different regions of the world: Africa (Martin and Stiles, 2000), South and Southeast Asia (Martin and Stiles, 2002) and East Asia (Martin and Stiles, 2003). Martin and Stiles (2005) noted their surprise at the large scale of both the German and UK ivory markets in 2004, and that these exceeded/were close to those of many Asian and African countries, such as China, Japan, South African, Cameroon and Nigeria: in 2004, the UK had the greatest number of outlets openly selling ivory products in the world, and ranked ninth in the number of items available. However, it was also noted that the primary difference between the European and Asian/African markets was that the great proportion of the European ivory could be considered antique (pre-1947) or had been crafted from registered raw ivory stocks acquired prior to 1989, and therefore, in principle were legal (though many items may have lacked the required documentation). Much of the ivory found openly for sale in Asian and African countries, on the other hand, had been acquired and crafted more recently and was potentially illegal (Martin and Stiles, 2005).

Despite evidence confirming the considerable availability of ivory in the UK market in 2004, there is a lack of information regarding the current status of the market and therefore the potential link between the surge in both legal and illegal global ivory trade and the UK ivory market in recent years. Using the survey undertaken in 2004 as a comparative baseline, this rapid assessment aimed to examine the size and composition of the current commercial UK ivory market for domestic and international use. It focused on the antiques sector, which was identified by Martin and Stiles (2005) as the main source of ivory for sale in the UK, and specifically sought to address the following:

- 1) The current size and market for ivory in the UK (based on surveys of the principal antiques markets identified by Martin and Stiles, 2005);
- 2) The awareness and compliance of UK traders with current CITES and EU Wildlife Trade Regulations;
- 3) The principal buyers/destinations for antique ivory purchased in the UK; and
- 4) Changes in the UK ivory market since 2004.

# LEGISLATION CONTROLLING COMMERCIAL IVORY TRADE IN THE EU AND UK

The information presented in this section is based on various sources, including the text of the EU Wildlife Trade Regulations, TRAFFIC's insights and European Union (EU)/European Commission guidance on interpretation of these regulations (including the Reference Guide<sup>11</sup>), a legal analysis carried out by DLA Piper UK LLP (2016) and consultation with UK CITES authorities. It is important to note that at the time of writing this report a referendum on EU membership was held (on 23rd June 2016) and the UK voted to leave the EU. This could result in future changes to the current legislation controlling trade in ivory.

Trade in elephant ivory is strictly regulated in the EU through the provisions of the EU Wildlife Trade Regulations (which implement CITES in the EU), and specifically *Council Regulation (EC) No. 338/97*<sup>12</sup> and *Commission Regulation 865/2006*<sup>13</sup>. As a general rule, ivory cannot be traded within, to or from the EU for commercial purposes. However, intra-EU trade, and re-export of ivory for commercial purposes are permitted under prescribed conditions. Under EU Regulations, the following exceptions and cut-off dates would be applicable to the UK:

- *intra-EU trade is authorized for antique ivory ("worked" specimens acquired before 3rd March 1947) and pre-Convention ivory (items imported into the EU before elephant species were listed in Appendix I of CITES (18th January 1990 for African Elephant and 1st July 1975 for Asian Elephants)); pursuant to Article 8(3)(a) of Council Regulation (EC) No. 338/97*
- *Re-export is authorized for antique ivory ("worked" specimens acquired before 3rd March 1947) and pre-Convention ivory (specimens acquired before the date on which CITES became applicable to them, i.e. 26th February 1976 for African Elephants and 1st July 1975 for Asian Elephants<sup>14</sup>); pursuant to Article 5(6)(ii) of Council Regulation (EC) No. 338/97.*

As per the exceptions described above, intra-EU commercial trade in antique ivory (officially described as "worked specimens" and falling under the "antiques derogation" in Article 62(3) of *Commission Regulation 865/2006*) can occur without internal EU trade certificates (often referred to as Article 10 certificates) being issued by the CITES Management Authority (MA). Traders offering an antique ivory specimen for sale should, however, be able to justify/have some form of proof (which can include expert opinion) that the specimen falls under the derogation and may be required to provide this proof when requested by authorities.

Re-exports of antiques from the EU, or intra-EU trade and re-exports of pre-Convention ivory, must be accompanied by the relevant certificates/permits issued by CITES MAs. In the case of intra-EU trade, the responsibility for acquiring an Article 10 certificate falls to the seller, prior to offering an item for sale. Both a re-export certificate and an import permit (from the country of destination) are needed for re-exports from the EU. The responsibility for acquiring certificates/permits is a) with the buyer if they are purchasing the item in-country and taking it to their country of residence or b) with the seller if they are shipping this abroad as part of the sale.

Worked specimens are defined in Article 2w of *Council Regulation (EC) No. 338/97* as specimens that were removed from the wild and significantly altered from their natural raw state for jewellery, adornment, art, utility or musical instruments, more than 50 years before the entry into force of the

<sup>11</sup> European Commission and TRAFFIC (2015). Reference Guide to the European Union Wildlife Trade Regulations. Brussels, Belgium.

<sup>12</sup> *Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora by regulating trade therein* – the "Basic Regulation".

<sup>13</sup> *Commission Regulation (EC) No 865/2006 (as amended by Commission Regulation (EC) No 100/2008, Commission Regulation (EU) No 791/2012 and Commission Implementing Regulation (EU) No 792/2012)* laying down detailed rules concerning the implementation of *Council Regulation (EC) No 338/97* – the "Implementing Regulation".

<sup>14</sup> The CITES Convention applied from 26th February 1976 to African Elephants with the listing of the species in Appendix III by Ghana; Asian Elephants were listed in CITES Appendix I on 1st July 1975.



Regulation, i.e. before 3rd March 1947. Such specimens are considered worked only if they fall clearly into one of the aforementioned categories and require no further carving, crafting or manufacture to affect their purpose. Antiques acquired before 1947, but that remain substantially unaltered from their natural state (i.e. whole uncarved tusks), do not qualify.

There have been a number of complications with applying this definition in practice, and consequently the EU developed internal guidance on this topic. This is based on the collective interpretation across all Member States on what may or may not qualify as “worked specimens” and when the general derogation from the need to get a certificate for commercial use for intra-EU trade applies. There are plans to release a public version of this guidance in the near future to facilitate appropriate use of the derogation by traders. This will cover aspects such as acceptable proof that the item was acquired prior to 3rd March 1947; typical examples of items falling under the definition “significantly altered from their natural raw state” and the categories of “jewellery”, “adornment” etc.; and the renovation and “re-working” of specimens.

Pre-Convention ivory is generally divided into two different types: “worked” and “raw” (or unworked). In this case the term “worked” is being used to describe specimens that have been modified to convert them into an item of jewellery, musical instrument etc., however this may have occurred after 1947, and therefore these specimens would not fall under the antiques derogation. Raw or unworked specimens are those that are not considered significantly altered from their natural state, such as whole uncarved ivory tusks, or small uncarved ivory pieces.

In the UK, the Control of Trade in Endangered Species (Enforcement) Regulations (COTES)<sup>15</sup> enables the EU Wildlife Trade Regulations to be enforced within the UK. In addition to these regulations, the UK has stricter domestic measures regarding trade in certain species. The UK only allows the commercial use of “worked” ivory specimens (either antiques or pre-Convention items). In some circumstances the UK Management Authority (MA) may also allow non-commercial use of unworked pre-Convention items (including ivory pieces or tusks), such as for cultural exchange between museums.

Authorized/unauthorized commercial use/offers for sale of ivory in the UK, and any consequent movement to/use in another EU Member State, is summarized below. In all cases, any movement of ivory (whether considered antique or not) out of the EU must be accompanied by CITES re-export certificates and import permits.

#### Authorized:

- Pre-1947 worked ivory specimens with some form of proof that this item fulfils the antiques derogation, but without an Article 10 certificate
- Worked African Elephant ivory specimens acquired prior to 1990 and worked Asian Elephant ivory specimens acquired prior to 1975 with an Article 10 certificate

#### Unauthorized:

- Pre-1947 worked ivory specimens without any form of proof that this item fulfils the derogation
- Worked African Elephant ivory specimens acquired prior to 1990 and worked Asian Elephant ivory specimens acquired prior to 1975 without an Article 10 certificate
- Post-1975 worked Asian Elephant ivory specimens and post-1990 worked African Elephant ivory specimens, and all un-worked ivory specimens, under any circumstances

---

<sup>15</sup> COTES Regulations came into effect in 1997, and have been amended in 2005, 2007 and 2009 and are currently under review.

## METHODS

A rapid assessment of the UK's domestic ivory market carried out in April 2016 involved surveys of:

- Physical antique markets/shops in London, revisiting most of the markets surveyed in 2004 by Martin and Stiles (2005), and
- Online offers for sale on UK-based antiques and auction websites, to complement the results obtained during the physical market survey.

In addition, the UK's current role in international trade in ivory, and the legal basis for UK ivory trade, was briefly reviewed through:

- Analysis of CITES trade data on import and re-export of ivory from the UK during 2005–2014;
- Reports of ivory seizures involving the UK, based on ETIS and EU-TWIX<sup>16</sup> data records;
- Available literature/guidance on relevant legislation and contact with UK CITES authorities for additional information and verification.

The use of the word “ivory” in this report refers to elephant ivory, unless otherwise specified. Throughout the report, the term “outlet” refers to all types of stalls, shops and online sites offering ivory items for sale. Markets are areas/buildings with either temporary or permanent stalls where a number of individual store-holders offer their items for sale. Shops are generally considered to refer to more permanent premises, with a single store holder (individual or group of traders) offering items for sale (see Table 1). The term antique/s is used in this report to refer to “worked” pre-1947 ivory falling under the worked specimen derogation of the EU Wildlife Trade Regulations (see legislation above), unless otherwise specified. It is important to note that an ivory item such as a tusk on a mount may be considered an antique by the antique sector due to its age, but if not sufficiently modified from raw state, it would not fall under the worked specimen derogation and therefore not be considered an antique under the EU Wildlife Trade Regulations.

### Physical market surveys

A full replication of the Martin and Stiles (2005) study was not possible due to funding and time limitations; the key UK markets for domestic ivory trade identified by Martin and Stiles were therefore prioritized for the 2016 survey. These involved all major antiques markets in London and a smaller number of antiques shops. Online surveys (see below) were further reaching, covering many other antiques shops and locations in the UK, complementing the results from the physical market surveys in London. The current survey was conducted in April 2016, 12 years on from the Martin and Stiles (2005) study in April and May 2004.

As per the key markets identified by Martin and Stiles (2005), the focus of this survey was on the antiques sector—target products, however, were not only antiques; all ivory items being offered for sale in antiques markets/shops were recorded, and observations and questions concerning the availability of new ivory in the UK were made (see below for further questions/topics discussed with traders). Furthermore, it is important to note that ivory is also used for musical instruments and/or could be sold in other business channels (such as non-antiques markets, car boot sales, other online

---

<sup>16</sup> European Union – Trade in Wildlife Information eXchange – the system includes a database of CITES seizures in the EU (<http://eu-twix.org/>)



London antiques market

marketplaces and/or social media)—music shops and other business channels were not surveyed and therefore this aspect of the UK's ivory market was not assessed.

All London antiques markets visited by Martin and Stiles (2005) were re-surveyed in 2016 (see Table 1), with the exception of Antiquarius, KM Antiques Fair, Fleurdelys, Bond Street Antiques Centre and St James Church Antiques Market, which were either no longer operational or were open on a day of the week that coincided with another market's opening hours. In the case of the latter, the market that was reported in Martin and Stiles (2005) as having a greater number of ivory items was prioritized. In addition, Harrods (the only department store found to be selling ivory items in 2004) and London's Chinatown in Soho were revisited.

The survey team spent as long as was required (ranging from a few hours to two working days) at each of the antiques markets to record the number and types of ivory items being offered for sale. The total number of stalls in each market and the number of stalls with ivory items on display were also recorded. For the larger markets, the total number of stalls were approximated. Many of the same traders were present at various markets. When the survey team were certain they had seen the trader in a previous market and with the same items for sale, this information was not recorded, to avoid duplication wherever possible. As a result, the total number of traders and items for sale at certain markets that were visited towards the end of the survey period (e.g. Spitalfields Market) were lower than might be expected.

Where stalls were closed, if possible they were revisited once on the same day or the following opening day/week. However, in many cases they were still not open and if items were not clearly on display, it was not possible to estimate the types and number of items for sale—these stalls were consequently not included in the counts of total number of stalls.

In the case of antiques shops, the survey focused on two main areas with a high concentration of antiques shops, namely Kensington Church Street, and the Mayfair area of Piccadilly, New/Old Bond Streets. When shops were closed (as was the case for many in the Mayfair area, which generally required an appointment), estimates were made from information on their websites or by looking through shop windows. It is important to note that many of the antiques markets have permanent antiques shops along the street associated with them (e.g. in Portobello and Camden Passage) or are permanent stalls/shops open every day within a large building (e.g. Alfies and Grays), and therefore

surveys of these shops were included in the market surveys (as done by Martin and Stiles, 2005).

For both the markets and shops, each ivory item on display was counted where possible, but where there were more than 10 of the same type of item per stall/shop, counts were made by +10 increments, or +50 if there were over 50 items on display. Only items that were on display were counted. A size category was assigned to each item and where possible the type of product, approximate age, price and any other details such as origin were recorded—either when this information was displayed, when it was possible to question the trader or based on the researchers' experience.

While Martin and Stiles (2005) provided size ranges by product type, the current study used a numerical system to categorize the different sizes of items found so that they could be swiftly recorded. The categories were as follows:

- Size 1: Very small – Jewellery, such as rings or earrings (one pair counted as one item);
- Size 2: Small – 1–10 cm in length/height;
- Size 3: Medium – 10–20 cm length/height;
- Size 4: Large – larger than 20 cm, including whole tusks;
- Size 5: A set – usually for a set of tableware (knife, fork, spoons) or vanity sets.

These categories and the guide ranges were used to allocate an approximate size to the items—where possible, the researchers also took other factors into consideration, such as width and density. If only part of an item was made of ivory, e.g. the handle of a walking stick or inlay in furniture, the size category selected was based on the amount of ivory within the item. It is important to note that there was a large variation in the size of the large category in particular. For example, there were hollow boats over 50 cm in length made up of hundreds of small thin pieces of ivory and whole carved tusks of variable sizes, including vases made of whole tusks reaching heights of 60 cm.

This survey recorded the specific product type for sale, where possible. In the case of figures, these were recorded as specific types (such as netsukes or Cantonese magic balls) where this was stated by the trader/clear to the researcher, however in other cases figures were simply recorded as “Figures” with their associated size category. For analysis, items were grouped into four main commodity types: jewellery, figures, household goods and personal items.

Where possible additional information was obtained from traders in order to gauge their knowledge/perception/awareness of the status of the UK ivory market, the buyer demographic and regulations concerning cross-border trade in ivory. Questions/topics of discussion included, but were not limited to:

- Most popular/common items for sale;
- Where/how the items were acquired;
- Awareness of each item's origin and/or age, including ability to identify elephant ivory and assess actual age of the item;
- The availability of new ivory on the market;

- Level of demand, including typical buyers and for what purpose, e.g. collectors;
- Awareness of current national regulations and CITES, including whether ivory items can be taken to other countries and any documentation needed;
- Concerns over possible new regulations or tighter controls, e.g. related to the new EU Action Plan or stricter measures in the USA;
- Suspicious activities including requests for new ivory or illicit transportation methods.

A survey method similar to that used by TRAFFIC in other ivory markets around the world was replicated here – the surveying team posed as potential and interested buyers, notes being taken using a mobile phone or Dictaphone, and photos taken wherever possible. No ivory was purchased as part of the survey. This covert survey method, however, limits the number and range of questions the survey team is able to ask and any information collated from traders during the current survey was opportunistic. Due to funding and time restraints, the current survey did not involve further in depth investigation/research into traders or items for sale. Ongoing research by Portsmouth University aims to gain a more comprehensive understanding of the supply and demand of ivory in the UK and of trader compliance/understanding of legislation, through questionnaires and interviews with antiques dealers, trade associations and auction houses, complementing the results of this survey (Arkell, 2015; C. Cox, University of Portsmouth, pers. comm. to TRAFFIC, 2016).

The survey team was composed of Chinese, European and North American nationals experienced in ivory identification. In cases where an item was identified by the survey team as ivory, but the trader was unclear whether it was in fact ivory, then the item was recorded as ivory. However, if the trader said an item was ivory when the survey team knew it was not, the item was not recorded. Certain items were impossible to identify/verify as ivory such as “miniatures”, which are small paintings on various media, including ivory. When the trader stated with certainty that these were painted on ivory these were recorded, otherwise miniatures were not included (and therefore the number of ivory miniatures seen is likely to be an underestimate of the actual total on the market). The focus of the survey was elephant ivory, but information on other kinds of “ivory”, such as that derived from whale teeth or walrus, hippo or mammoth tusks, was noted if deemed to be of interest, e.g. when the trader had mistaken it for elephant ivory.

Where possible, similar methods were used for both the 2004 and 2016 surveys, to facilitate some comparison between results. The key markets for domestic ivory trade identified by Martin and Stiles (2005) were re-visited in 2016, and the number of outlets, the number of ivory items on offer for sale and their prices were also recorded. Furthermore, ivory not displayed openly was not counted, unless the trader brought it out to show.

However, it is important to note that there were a number of differences/uncertainties in relation to the methods used in 2004. For example, in the 2016 surveys, a covert survey method was utilized, duplication of counts was avoided if individual traders were recognized at different antique markets, and due to time and funding constraints the survey team were unable to revisit a number of outlets that were closed on the initial visit. As it is unclear whether Martin and Stiles employed these survey techniques, a direct and precise comparison and analysis of changes over time is not possible.

## Online surveys

The survey team conducted a survey of offers for sale on various antiques and auction websites over two weeks in April 2016, obtaining a snapshot of online advertisements for ivory products in the UK. This was not intended to be an exhaustive survey of online ivory sales, but to complement the findings from the physical market survey, specifically looking at the types of antique ivory items that are available online and how they compare with ivory available at physical markets. Online surveys also allowed the survey team to collate more information on prices and ivory antiques offered for sale or auction by traders beyond London; combined with physical market surveys exclusive to London, this has enabled a more comprehensive picture to be built up of ivory availability across the UK. There are a number of past and ongoing initiatives monitoring online sales of wildlife, and ivory in particular, on online auction websites (such as *eBay*) and classified advertisement sites in Europe and the UK (IFAW, 2014; A. Roberts, NWCU, pers. comm. to TRAFFIC, 2016), and therefore this study did not go into this aspect in further detail.



Ivory figure for sale on UK-based online antiques marketplace

Two types of websites were included in the search:

- Antiques auction consolidation websites, where lots from many different auction houses can be viewed in one place.
- Online antiques marketplaces, which connect small and large traders with potential buyers;

In each case only a select number of sites were searched—the first few pages/principal results using a number of search engines were used to prioritize sites for further research. Two auction consolidation sites were sampled: *Barnebys* and *The Saleroom*, both of which are used by a range of UK auction houses such as *Christie's*, *Dreweatts*, *Sotheby's* and *Woolley & Wallis* (see Appendix 3) and six online antiques marketplaces were surveyed (see Appendix 4).

Web scraping software<sup>17</sup> was used to extract data from ivory advertisements from a range of UK websites that specialize in the selling of antiques, using “ivory” as the search item. A number of data points were recorded for each advertisement, including the product description, condition and dimension, list price, sales status, trader/contact information and provenance details. However, not every advertisement had information on every data point. The results were then manually checked to ensure only those advertisements with seemingly genuine ivory were included.

Several companies/shops used more than one of the online marketplaces to offer their items for sale, and a number of auction houses used both consolidation sites—duplicates from these sites were identified and removed from total counts, where possible. In the case of the auction consolidation websites, The *Saleroom* was used as the principal source of information as auction house names were provided in all cases; additional information from named auction houses with lots on *Barnebys*, and not advertised on the *Saleroom*, were then added to the totals.

The number of items/lots on auction or for sale on each online antiques shop/auction house site was then counted. Counts per outlet included items that were on sale or up for auction at the time of the survey, as well as items that had been sold and auctioned in the past, but were still appearing on the website. Other ivory, such as that derived from whale teeth, and walrus, hippo and mammoth tusks, were sometimes included in the results from the searches “ivory” — these were excluded from the total ivory counts.

#### CITES trade data

Trade data for Elephantidae<sup>18</sup> were extracted on 18th May 2016 from the CITES trade database managed by UNEP-WCMC<sup>19</sup> for the period 2005–2014. At the time of writing, the most recent annual data available were for 2014, however these are likely to be incomplete as not all CITES Parties had submitted their 2014 reports by this time (CITES, last updated 4th May 2016<sup>20</sup>). The UK submitted all of its reports for 2005–2014, and therefore this analysis focuses on data reported by the UK, unless otherwise specified, i.e. when focusing on re-exports from the UK, exporter data (reported by the UK) have been used instead of importer data (from various countries), and vice versa for UK imports. Differences between reported importer and exporter data were analysed/highlighted when of interest.

Non-ivory elephant products (such as elephant teeth, bone, elephant leather products) were removed from the analysis and ivory terms were classified under the following categories to facilitate analysis:

- Raw ivory: tusks, ivory pieces and ivory scraps (there being no data for the latter)
- Worked ivory: ivory carvings and carvings

The analysis focused on the number of records and the quantities of raw and worked ivory traded, using comparative tabulations to assess the import into and re-export out of the UK. Comparison between UK and EU trade in ivory was also made—trade of antique ivory within the EU is permitted without CITES documentation and hence would not be recorded in the trade database; therefore, EU trade in ivory as a whole must be considered even when focusing on the UK market.

Trade records were typically reported as number of pieces or by weight, making it difficult to compare and to measure the total volumes in any given year. This is particularly the case for “ivory pieces”;

---

<sup>17</sup> <http://www.locoy.com/>

<sup>18</sup> This includes trade reported as Elephantidae spp., *Elephas* spp. (Asian Elephant) *Loxodonta* spp. (African Elephant), *Elephas maximus* and *Loxodonta africana*.

<sup>19</sup> United Nations Environment Programme-World Conservation Monitoring Centre.

<sup>20</sup> Annual Reports of CITES Parties: [https://cites.org/sites/default/files/annual\\_reports.pdf](https://cites.org/sites/default/files/annual_reports.pdf) (accessed 18th May 2016).

“ivory carvings” and “carvings”, where the number of pieces given could refer to different sizes and weights (UNEP-WCMC, 2013). Where the number of tusks were reported, however, it was possible to convert this to an approximate number of elephants in trade (two whole tusks per elephant).

When examining the purpose of trade, this analysis focused on commercial (code: T, or blank), and also items traded for personal use (code: P) where relevant, with records for other purposes such as scientific (code: S) being minimal in comparison. The analysis also focused on specimens derived from wild-caught specimens. The following source codes were considered “wild sourced” and included in the analysis: specimens taken from the wild (code: W), confiscated or seized specimens (code: I), source unknown (code: U or blank) and pre-Convention specimens (code: O).

## Seizure data

A summary of ivory seizure data for 2005–2014 was sourced from ETIS, and details about specific seizure cases were supplemented with data from EU-TWIX (following permission granted by the reporting EU countries) and information published in the media.

Since seizures can be reported as either number of pieces or total weights, ETIS has developed regression models on the ratio of ivory pieces and weights, based on previous data, to assign an estimated weight for all seizure cases. The weights of worked ivory seizures are also recalibrated to account for loss during the carving process, which inflates the weight by about 30%, resulting in raw ivory equivalent (RIE) weights. It also makes worked ivory seizures comparable by weight to raw ivory.

A summary (total number of annual seizures and estimated annual weight) of two types of seizure data were analysed: ivory seizures that were made in the UK and reported by the UK, and ivory seizures that involved the UK as either the country of origin, export/re-export, transit or destination. The latter was based on seizure data reported by countries other than the UK.



Antiques markets	Location (in London)	Opening days	Opening times*	Type(s) of outlet	URL
Alfies Antique Market	Marylebone	Tuesday to Saturday	10.00 - 18.00	Permanent indoor market with stalls/shops	<a href="http://www.alfiesantiques.com/">http://www.alfiesantiques.com/</a>
Bermondsey Antique Market	Bermondsey	Friday	06.00 - 14.00	Open air weekly market with stalls	<a href="http://bermondseysquare.net/bermondsey-antiques-market/">http://bermondseysquare.net/bermondsey-antiques-market/</a>
Bourbon Hanby	Chelsea	Monday to Saturday	10.00 - 18.00	Permanent indoor market with stalls/shops	<a href="http://www.bourbonhanby.com/">http://www.bourbonhanby.com/</a>
Camden Passage Antiques Market	Islington	Wednesday and Saturday	08.00 - 17.00	Open air bi-weekly market with stalls	<a href="http://www.camdenpassageislington.co.uk">http://www.camdenpassageislington.co.uk</a>
		Monday to Sunday	10.00 - 17.00	Permanent shops	
Covent Garden	Covent Garden	Monday to Sunday	09.00 - 20.00	Permanent indoor market with stalls	<a href="https://www.coventgarden.london/markets">https://www.coventgarden.london/markets</a>
Grays Antique Centre and Mews	Mayfair	Monday to Saturday	10.00 - 18.00	Permanent indoor market with stalls/shops	<a href="http://www.graysantiques.com/">http://www.graysantiques.com/</a>
Hampstead Antique Emporium	Hampstead	Tuesday to Sunday	10.00 - 18.00	Permanent indoor market with stalls	<a href="http://www.hampsteadantiqueemporium.com">http://www.hampsteadantiqueemporium.com</a>
Kensington Antiques Centre	Kensington	Monday to Sunday	09.00 - 18.00	Permanent indoor market with stalls/shops	<a href="http://www.antiques-london.com/">http://www.antiques-london.com/</a>
Portobello Road Antiques Market	Notting Hill	Saturday	08.00 - 17.00	Open air weekly market with stalls/shops	<a href="http://www.portobelloroad.co.uk/the-market/">http://www.portobelloroad.co.uk/the-market/</a>
	Notting Hill	Monday to Sunday	09.00 - 17.00	Permanent shops	
Royal Horticultural Hall (Adams Antique Fair)	Victoria	Sunday	10.00 - 16.30	Monthly indoor market with stalls	<a href="http://www.adamsantiquesfairs.com/">http://www.adamsantiquesfairs.com/</a>
Spitalfields Market	Liverpool Street	Monday to Sunday	10.00 - 17.00	Indoor weekly market with stalls	<a href="http://www.oldspitalfieldsmarket.com/">http://www.oldspitalfieldsmarket.com/</a>
Other areas with antiques shops					
Kensington Church Street	Kensington	Monday to Sunday	10.00 - 17.00	Street with high concentration of antique shops	<a href="http://www.antiques-london.com/">http://www.antiques-london.com/</a>
Mayfair area	Mayfair	Monday to Sunday	10.00 - 17.00	Area with high concentration of antique shops	

**Table 1. Antiques markets/shops surveyed in April 2016 in London, UK.** \*Opening times are approximate—in many cases, especially for markets, stalls can be set up earlier or later in the day, and also close earlier.

# RESULTS

## Physical market survey results

Thirteen antiques markets and two areas with a high concentration of antiques shops in London were surveyed for ivory items in April 2016—all markets and areas had ivory items for sale. Of the ~1,200 stalls and shops selling antiques surveyed in the 13 market areas, 15% (~200) were offering ivory for sale. A total of ~3,200 ivory items were counted, of which ~56% belonged to size 2 (between 1cm and 10cm) and ~35% belonged to size 3 (between 10cm and 20cm). In total, 73 of the 87 product types found during the 2016 survey were of sizes 2 and 3. A total of ~7% belonged to size 4 (larger than 20cm, including whole tusks) with size 5 (a set of items) and size 1 (very small items such as jewellery) each making up ~1% of the ivory items found. Of the 30 antiques shops found along Kensington Church Street, nine had a total of ~250 ivory items for sale and four shops in the Mayfair area had ~40 ivory items for sale.

When comparing these results with those from 2004 (for the same 13 market areas only), there appears to have been a significant reduction in the total number of stalls in London markets selling ivory (from 641 in 2004, 35% of the total, to 193 in 2016) and the total number of ivory items for sale (from ~6,000 items in 2004 to ~3,200 in 2016) over the last decade. However, it is important to note that the total number of stalls in a number of markets varied significantly between 2004 and 2016, being much higher in 2004 in a number of locations such as Bermondsey, Camden Passage and Portobello. This may be due to an actual reduction in traders over the last decade<sup>21</sup>, or the fact that the number of traders can vary significantly between market days due to factors such as weather and number of customers<sup>22</sup>. Furthermore, in 2016 only those shops/stalls actually selling antiques and either open for business or with articles on display that could be viewed from the window were counted, and the total numbers for large markets were approximated.

In both 2004 and 2016, six markets were responsible for offering more than 90% of ivory items. The average number of ivory items displayed per market stall/shop appears to have increased, from 10 items in 2004 to 16 items in 2016, suggesting that while fewer traders may be offering ivory, they each have on average a larger stock.

## Individual market/area results

### *Portobello Road Antiques Market*

Portobello Road Antiques Market is considered one of the world's largest antiques markets, offering antiques for sale every Saturday throughout the year. Traders have stalls in over 15 arcades/galleries (and also on the street) along Portobello Road and adjoining roads, in addition to a number of permanent antiques shops open throughout the week (which were also included in this market survey). Approximately 500 stalls/shops were found to be selling antiques during the April 2016 survey and 81 stalls were offering antique ivory items for sale. The type and number of ivory items varied considerably between traders—the majority (63%) were selling 10 ivory items or fewer, with only eight stalls apparently specializing in ivory, together offering over 50% of all ivory items available for sale at Portobello market.

---

<sup>21</sup> Based on information published in the *Guide to the Antique Dealers of Great Britain* (no longer available) and BADA (the British Antique Dealers' Association) and LAPADA (the Association of Art and Antiques Dealers) membership, it is estimated that the number of antique dealers in the UK has declined by at least 20% over the last decade (M. Dodgson, BADA, *in litt.* to TRAFFIC, August 2016).

<sup>22</sup> In Portobello market for example, many traders closed their stalls earlier when visited during the first week of the survey, as they were frustrated with the lack of customers.

In total over 1,400 different ivory items were seen for sale in the Portobello area—this is less than half the number of items that were recorded in 2004. Together with the fact that there appears to have been a drop in the number/proportion of traders offering ivory (35% of stalls in 2004 compared to only 16% in 2016), this suggests there has been a decline in the availability of antique ivory at Portobello over the last decade. However, Portobello market was still the principal market area in London for antique ivory, offering for sale nearly 45% of all ivory items seen during the April 2016 market survey.

#### *Royal Horticultural Hall (Adams Antiques Fair)*

Adams Antiques Fair is a monthly Sunday fair located at the Royal Horticultural Hall, and offers high-end antiques in an indoor market environment. In April 2016, 42 of a total of 150 stalls were offering antique ivory items for sale. The number of ivory items found at each stall varied between one and 25 items, with two-thirds of the stalls offering five ivory items or fewer for sale. ~217 ivory items were counted in the Royal Horticultural Hall in April 2016, which amounted to less than a third of the number counted there in 2004 (739). A decline in the proportion of traders with ivory items available (68% in 2004 compared to only 28% in 2016) suggests, as for Portobello market, a reduced demand and/or availability for antique ivory at the Adams Antiques Fairs.

#### *Camden Passage Antiques Market*

Camden Passage Antiques Market is an outdoor market open twice a week; there are also several permanent antiques shops along Camden Passage and on adjoining streets. Of the 25 stalls and shops found to be selling antiques in April 2016, 13 were offering ivory items for sale. The number of ivory items found at each stall/shop ranged from one to ~500 items—the latter was in an antiques shop specializing in ivory, with an extensive range of items for sale, both by size and origin. In total, ~650 ivory items were counted along Camden Passage (making this market area the second most important for ivory, after Portobello), which is the same as in 2004 (653 items). However, as noted above, ~500 of these were held in one shop alone, and of the remaining 150 items, the average number of items per stall in the rest of the market was similar in 2016 (13) to that in 2004 (10.5).

#### *Grays Antiques Market and Grays Mews Market*

Grays Antiques and Mews Markets are located inside two heritage buildings in London's West End, offering antiques for sale six days a week. Of the total of 110 stalls counted in the Grays Antiques and Mews Markets (60 and 50 stalls respectively) in April 2016, 21 (11 and 10 respectively) were seen offering ivory items for sale. Stalls had a wide range in number of ivory items for sale, from three to over 150 items. Around 200 ivory items were seen at Grays Antiques Market, and 279 at Grays Mews Market. Combined, the two Grays markets had the third most numerous ivory items amongst London's antiques markets surveyed. The total number of ivory items was similar between 2004 (456) and 2016 (483), however there was an increase in the number specifically available in the Grays Mews Market. This was largely due to one stall that held an estimated 155 ivory items (predominantly small netsukes) in 2016, more than half of the total found at Grays Mews Market.

#### *Bourbon-Hanby Antiques Centre*

Bourbon-Hanby Antiques Centre is an indoor arcade with stalls/shops that specialize in high-end antiques and collectables, open six days of the week. Of the seven antiques shops in the arcade, five were offering ivory items for sale in April 2016, making this the market with the highest proportion of stalls/shops offering ivory (70%). Number of items per shop ranged between four ivory items to ~95 items, with a total of 146 ivory items counted, an increase from 115 items in 2004. Despite its small size, Bourbon Hanby had the sixth highest number of ivory items for sale across the 13 markets.

### *Covent Garden Markets*

Both Jubilee Market Hall and Apple Market in Covent Garden have antiques for sale—Jubilee Market hosts an antique market with around 100 stalls once a week and ~50 stalls at Apple Market sell a variety of arts and crafts, clothing, food and gifts items, including antiques, every day of the week. Only six stalls were seen selling antique ivory items (between three and 22 ivory items per trader) at Jubilee Market in April 2016, while none of the stalls at Apple Market had ivory items for sale. A total of 43 ivory items were counted, which was slightly fewer than the 56 antique ivory items found across 18 stalls at both Jubilee and Apple markets in 2004.

### *Alfies Antique Market*

Alfies Antique Market has a mix of antiques, vintage and retro furniture, fashion and household items for sale, and is open five days a week. A total of 67 stalls were open when visited in April 2016, with six stalls offering a total of 48 antique ivory items for sale. These stalls had between one and 22 antique ivory items on offer. The amount of ivory recorded in Alfies market in 2016 is considerably less than the 263 ivory items found in 2004. Back then, 16 stalls were offering ivory for sale, out of a total of 118 stalls at the market.

### *Bermondsey Antiques Market*

Bermondsey Antiques Market runs once a week and is primarily an open-air antiques market, with a small number of stalls located indoors. Of the 60 stalls that were set up at Bermondsey Market in April 2016, nine were selling a total of 40 items of antique ivory. Few ivory items were sold at each stall, ranging from one to nine items. In 2004, the total number of stalls (223), those selling ivory (60) and the total number of ivory items for sale (552) were all considerably higher than in 2016.

### *Hampstead Antique & Craft Emporium*

Hampstead Antique and Craft Emporium is a small indoor antiques and craft market in London open six days of the week, with 25 traders selling a variety of vintage and antique items. Three stalls were seen selling a total of 26 antique ivory items in April 2016; this is a slight reduction from the 38 ivory items recorded in 2004.

### *Old Spitalfields Market*

Old Spitalfields Market holds different types of markets during the week, with one day set aside for antiques. Of the ~150 stalls set up in April 2016, only six were offering antique ivory items for sale. However, three of these were traders seen at other markets and their ivory items were not included in the totals. A total of only nine antique ivory items were counted which is very low in comparison to the 144 ivory items found in 2004.

### *Kensington Church Street and Antiques Centre*

There is a large concentration of high-end antiques shops (~30 in total) along Kensington Church Street in London, including the Kensington Antiques Centre, which has eight antiques stalls inside. In April 2016, nine of the shops along the street were offering a total of 249 ivory items for sale, and five of the stalls in the Kensington Antiques Centre were offering a total of 61 items. The number of ivory items varied considerably between traders, from one to 90 items—one shop specializing in walking sticks stocked an estimated 50 items with ivory handles. Both the number of shops and number of ivory items found in this area appeared to have declined since 2004, when 16 shops/stalls were selling around 800 ivory items.

### *Mayfair area (Piccadilly, New/Old Bond Streets)*

Mayfair is an exclusive area in West London and many of the antique shops offering high-end items in this area can only be viewed “by appointment only”. Due to the limited timeframe available for the 2016 survey, this restricted the number of shops visited/items counted and the physical market results for this area were supplemented by viewing results online from their dedicated websites. In April 2016, four shops were offering antique ivory for sale (~40 items in total), with the number of ivory items on offer ranging from three to 25 items per shop. Together these shops had some of the highest priced antique ivory found during the 2016 survey such as an ivory cabinet costing over GBP30,000.

Finally, in April 2016 no ivory items were found openly for sale in London’s Chinatown (the same result as for 2004) or in Harrods, a high-end department store in Knightsbridge. When researchers questioned shop assistants in Harrods, they were told that Harrods no longer has an antiques department and consequently has no ivory items for sale.

### Product Types and Prices

In the current study, a wide range of ivory items were found on offer for sale including figures (56%), household goods (27%), jewellery (9%) and personal items (8%) (see Appendix 2). Of the figures on offer for sale, nearly half were medium sized (between 10cm to 20cm, size 3), followed closely by small figures (between 1cm and 10cm, size 2) and netsukes. Household goods were mainly made up of magnifying glasses followed by small sized cutlery (both with handles made of ivory). Jewellery items on offer for sale were predominantly small-sized brooches, bangles/bracelets and pendants. The commodity group for which the lowest number of ivory items was found were personal items, of which the majority were walking canes with ivory handles and medium sized fans. Of note is that Martin and Stiles (2005) similarly found that the majority of items on offer for sale in 2004 included figures, netsukes, magnifying glasses, cutlery, brooches, bangles, pendants and walking canes. Martin and Stiles (2005) also found that the majority of ivory items were of sizes equivalent to the current size categories 2 and 3.



Ivory figures for sale in London antiques market

Prices were only obtained during the 2016 surveys where marked or stated by the trader and therefore a comprehensive comparison with prices recorded in 2004 is not possible. Online sales offers may however give a better indication of current prices for certain ivory items and may facilitate a more accurate temporal comparison (see online survey findings). Overall, prices in 2016 ranged enormously from ~GBP10 to more than GBP35,000 per item<sup>23</sup> (see Appendix 2). Figures and household goods were the items that varied the most in price; figures ranged from ~GBP15 to GBP18,000 per item, while household goods ranged from ~GBP10 to more than GBP35,000 per item. Personal items fluctuated less in price, ranging from GBP10 to GBP12,000 per item, and jewellery ranged from GBP10 to GBP350 per item. Overall, high market prices were attributed to large ivory items on offer for sale and were predominantly found in shops rather than stalls, for example a veneered piece of furniture made of >90% ivory was priced at GBP34,500, and large cutlery sets priced up to GBP8,000. Comparatively, smaller items fetched lower prices and were mainly sold in stalls, for example knives were priced at ~GBP10 per item and shoe horns between GBP50 and GBP100 per item.

#### Additional information on the UK ivory market collected from traders

Overall, market and shop traders offering ivory items for sale were moderately knowledgeable about individual pieces, their age and provenance and legislation; however, there was a large variation in knowledge in particular between high-end antiques traders (generally very knowledgeable) and opportunistic traders. Traders were generally approachable and forthcoming with information when asked and it appeared that traders were acquiring much of their knowledge/information on UK legislation, changes to other national legislation affecting international trade and views on any such changes from articles published in the *Antiques Trade Gazette*<sup>24</sup>. These articles were referred to by many traders, suggesting this would be a very important medium for any future awareness raising amongst this group of stakeholders.

#### *Identification and pricing of elephant ivory items versus other materials*



**Cutlery for sale at London antiques market - handles made of ivory and other materials**

On a number of occasions, the survey team discovered that other materials such as bone, horn, resin, ivorine or other plastics were being misidentified as elephant ivory, and vice versa. Of note, however, is that traders were generally more concerned with craftsmanship, style of carving and the era and/or provenance of antiquity as indicators of quality and value rather than the material the item was composed of. In many cases there was little difference in the price of items composed of ivory and similar materials. For example, one trader was offering for sale a cutlery set (composed of four pieces) made with ivory handles for GBP29, and a similar set made of ivorine (six pieces) for GBP25. Similarly, another trader was offering two magnifying glasses, one with an ivory handle and the other with a plastic handle, for GBP12 and GBP10, respectively.

<sup>23</sup> The survey team were informed by traders that they had several ivory items priced at ~GBP50,000 per item, however in these cases the traders did not specify which these were so they were not attributed to a specific ivory item.

<sup>24</sup> <https://www.antiquetrade gazette.com/>

When asked how traders distinguished between elephant ivory and similar materials (including other animal ivories such as mammoth), some explained that it was colour, brightness, or the sense of touch that helped them differentiate it. Some relegated it to expertise and/or experience, and only one trader mentioned the importance in the grain of the ivory, however the crossed pattern/Schreger lines found in elephant ivory was not described.

#### *Awareness of age and origin*

The majority of the traders were able to provide an approximate manufacturing age for ivory items on display, by century, a few decades or specifically referring to them being prior to the 1920s or 1947 (the latter the legal “antique” classification cut-off for ivory). The oldest item on offer for sale was dated as 1740. Only one product was confirmed to have been made after 1947, allegedly produced in 1969. When asked how traders established the age of an item, most referred to their expertise and specific knowledge of era/type of the antique. Traders in high end shops tended to be more precise/knowledgeable about age and origin and noted they were able to provide confirmation of this through past sales information or expert opinion. With regards to new ivory, certain traders explained it had little value to their business given that the *raison d'être* of the antiques industry is preserving pre-modern objects as works of art, suggesting that freshly poached ivory was of little value in the antiques market.

The majority of the traders were also able to provide information on the origin of ivory items with the majority of products claimed to be from China, Japan and India. Other areas of origin included Europe (mainly Germany and France) and Africa. With regards to acquiring ivory items, traders claimed to source products from other markets across the UK, house clearances and auction houses.

#### *Nationality of buyers*

According to traders, the principal buyers of ivory antiques in recent years are East Asian citizens, from mainland China, Japan and Hong Kong, as well as European citizens, such as Germans, Austrian and Portuguese. One trader explained that she had learnt the Chinese (Mandarin) word for ivory to accommodate the high number of potential Chinese buyers. Furthermore, during the surveys, two Chinese speaking “scouts” were observed taking pictures of antiques, including ivory items, on their mobile phones, uploading images with descriptive text, and calling contacts (speaking in both English and Chinese language). No purchases were specifically observed, however one trader confirmed that one of the scouts had purchased many ivory items in the past.

In comparison to Martin and Stiles’ findings, there appears to have been a change in buyer demographic over the last decade. In 2004, it was reported that the majority of buyers were from the USA, followed by the UK and other European countries. Furthermore, in 2004 it was noted that high-end shops were apparently selling 75% of ivory antiques to US citizens, however in 2016 many traders noted a dramatic decline in buyers from the USA.

#### *Awareness of UK, other national and international legislation*

Generally, traders had a mixed understanding of what constitutes legal international trade in ivory, although their awareness of the existence of a specific cut-off date for legal trade in antique ivory was unanimous. Whilst some traders could accurately pinpoint the correct year in which an ivory item is considered “antique” by law (ivory acquired and modified before 1947) and permitted in internal EU trade without CITES documentation, others stated various dates between the 1920s and 1960s.

Most high-end traders were very knowledgeable regarding the national and international legislation and specific requirements for trade pertaining to ivory. Those that were aware of the legal restrictions

in ivory trade also understood the evidence needed for their customers to take ivory pieces out of the EU, such as the provision of an invoice and verification of age from the trader. Many stated that the customer would then be responsible for acquiring an export permit. However, some traders offered to carry out this service on a buyer's behalf.

A number of traders were forthcoming with information regarding changes in legislation highlighting their apprehension in selling ivory items to certain members of the survey team (which included Chinese and US nationals), due to stricter domestic legislation in their national countries. Many traders appeared to know the specifics of US legislation, including the differences between State laws. However comparatively, traders were generally less aware of the legality in exporting to China; some thought it was illegal, while others were unaware of any legislative changes in China but insisted that the customer should be responsible to check themselves as to the rules in the intended destination country. Exporting to China was considered a risk by several traders and one specifically mentioned the need to check personal identification upon purchase as they refused to sell ivory to Chinese nationals due to regulatory changes. It is important to note that a few traders, although aware of regulatory changes in China, suggested that purchasing small ivory items was not an issue and that the buyer would be able to transport these items in their personal luggage without detection. Some traders were also aware that worked ivory can be taken to other EU countries, but unworked tusks are not permitted in trade. One trader stated that unworked ivory was a lot more common 10 to 15 years ago; she believed this was due to some legislative changes.

Other traders took a more fluid stance on the documentation required for trade and international legislation with regards to exporting ivory to countries outside the EU, particularly China. Several traders suggested that transporting ivory items to China was not a problem at all. A member of the survey team came across a Chinese citizen who declared she had successfully transported many ivory items by post. Other methods/techniques suggested by traders to facilitate the export of ivory items included declaring the items as personal/household items that the buyer is travelling with, using women to take items as they were less likely to be checked by the authorities, that a receipt was adequate proof of age, and that the trader could state on the receipt the item was made of animal bone rather than ivory.

## Online Survey Findings

Surveys of the online antiques ivory market in the UK focused on two types of websites: antiques auction consolidation websites and online antiques marketplaces. Lots from over ~70 different UK based auction houses could be searched on the auction consolidation websites. Several auction houses were using both sites—therefore the *Saleroom*, which provided more specific details of the actual auction houses involved was taken as the main source of information, and items from any additional auction houses found on *Barnebys* were added to these results (see Appendix 3). *Barnebys* results on the other hand included more guide price information, and therefore these were used for price analyses. Several traders used multiple online marketplaces to offer their items for sale. Total and unique results for each market place are presented in Appendix 4.

### Number of ivory items for sale online

#### *Antiques auction consolidation websites*

When surveyed in April 2016, the *Saleroom* was being used by 65 auction houses with a total of 578 lots containing ivory. *Barnebys* had an additional 10 auction houses (not using the *Saleroom*) offering



117 lots of ivory<sup>25</sup>, totalling 695 items across all antique auction consolidation houses. The auction houses with the most number of ivory items being auctioned were *Woolley & Wallis* (54 items, 8% of the total number of items across all auction houses), *Bamford Auctioneers & Valuers* (49 items, 7%), *Canterbury Auction Galleries* (47 items, 7%) and *Dreweatts* (43 items, 6%) (see Appendix 3). Twenty-two auction houses were together offering nearly 75% of the total number of ivory items (10 items or more each), with another 53 auction houses each offering between one and nine items.

### *Online antique marketplaces*

Six online antique marketplaces were sampled in the survey, yielding a total of 2,008 ivory items for sale during the survey period. However, a number of sellers were using multiple marketplaces to offer their items for sale – when clear duplicates were removed the total number of unique items for sale was 1,710 ivory items. Platforms such as *Antique Atlas*, *Online Galleries* and *British Antique Dealers Association* (BADA) offered a large number of ivory items for sale, with 734 items, 606 items and 336 items advertised respectively on a specific date in April (731, 454 and 265 unique items, respectively). These three platforms together made up 85% of the unique ivory items found in the survey of online antiques marketplaces. *Selling Antiques* also had a large number of ivory items advertised (163 unique items, 10% of total) (see Appendix 4).

### Product types

Similar items observed in the physical markets were also found online. The majority of ivory items found online fitted into an existing category of products sold in the physical markets. A few very unique items, such as an Indian ivory/tortoiseshell desk blotter on offer through *Burstow and Hewitt*, and a cricket cage up for auction through *Christie's* for an estimated GBP15,000–GBP25,000 were also found.

All the items observed online may be considered “antique” under the UK’s definition of antique ivory, with the most recent item reportedly manufactured (carved) in the 1920s. Items were dated as early as the 17th century, with many from the turn of the 20th century. Products were from a broad range of countries and styles, with the most prominent being Japanese carvings (figures and netsukes), French and English household items and miniatures (paintings), German, French and Spanish jewellery; and various other decorative items such as panels and vases from China, Japan, Africa and India.

### Prices

#### *Antique auction consolidation websites*

Guide price data were more frequently provided on *Barnebys* (96% of lots had guide prices) compared with *The Saleroom* (6% of lots). Therefore, guide price information from the *Barnebys* website were used to assess product prices.

Forty-two per cent of items being offered for sale through the antiques auction consolidation website *Barnebys* had guide prices of under GBP500. A large number of ivory items (37% of the total advertised on *Barnebys*) had guide prices between GBP1,000 and GBP5,000. Items below GBP500 included chess sets, gambling chips, cutlery, fans and a wide range of figures. The item with highest guide price was an ebony table cabinet from circa 1650 made of a mix of materials such as ivory, tortoiseshell and cedar wood being auctioned at *Christie's* (GBP20,000–GBP40,000).

---

<sup>25</sup> The web scraping software found an additional 301 items on *Barnebys* that were not ascribed to a specific auction house. Manual checks of these items confirmed that most were also being sold on the *Saleroom*. Therefore, these additional items were not included in the total count of ivory items in auctions.

### Online antiques market places

The price range of ivory products was the lowest for the website *Antique Atlas*—with 60% of ivory items priced under GBP500. Items under GBP100 were typically household goods (including needle cases, scissors, letter openers, page turners), smaller figures and jewellery pieces (including brooches, bangles and earrings). Items between GBP100 and GBP500 included carved Japanese-style figures, Chinese fans, portrait miniatures, jewellery boxes, magnifying glass, opera glasses and small to medium sized figures. The most expensive ivory item found on *Antique Atlas* in April 2016 was a pair of Japanese carved vases costing GBP7,500.

Figure 1 compares the range of prices for ivory items on one of the online marketplaces with the greatest number of items for sale (*Antique Atlas*) and one of the antiques auction consolidation websites (*Barnebys*). Based on price information from these websites alone, antiques auction websites had a greater proportion of higher-priced ivory items for sale (based on guide prices provided) compared to items found on online marketplaces. 41% of ivory items on *Barnebys* had a guide price of GBP1,000 or more, while only 10% of ivory items on *Antique Atlas* were priced at GBP1,000 or more. The majority of ivory items were under GBP500 on both types of antique ivory websites, with 42% of items on *Barnebys* and 60% on *Antique Atlas* within this price range.



**Figure 1: Price ranges of antique ivory items offered for sale on UK online antiques marketplace**

*Antique Atlas* and auction consolidation site *Barnebys* in April 2016. Notes: Number of items falling within the respective price range is indicated within each colour bar. Where a price range was given for an ivory item, the uppermost price was used in the analysis, e.g. for a product with a guide price of GBP20– 400, GBP400 was used in the calculation.

### Declarations concerning age, provenance and legality

The various auction consolidation sites (and corresponding individual auction houses) and online marketplaces surveyed appeared to be using different methods for providing information on the age and legality of the ivory being offered. *Selling Antiques* requires antique dealers to include a formal declaration that states the date of manufacture, and the date is shown on the product detail page. Both *Online Galleries* and the *BADA* websites have the date of manufacture included in brackets after the title, however it is unclear if this is a requirement. Further, *BADA* specifies the need to obtain a CITES certificate when exporting an item outside the EU, with the following paragraph found at the bottom of an ivory product advertisement's webpage:

## Antique Ivory Gavel Circa 1900



We have something here for the auctioneer in the family, a lovely late 19th century/early 20th century gavel.

This beautifully grained and very tactile carved ivory auctioneers gavel consists of an elegantly turned handle extending to a traditionally formed gavel head. The gavel is approximately 5 & 3/4 inches (14.6cm) long and is in an excellent undamaged condition.

Non UK buyers should contact us before buying this item to discuss CITES regulations.

Note related to CITES regulations included with advertisement for ivory item on UK-based online marketplace

Contact Seller

Tel: [REDACTED]

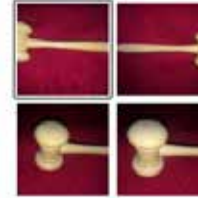
Please quote Antique Atlas

Non UK callers: +44 [REDACTED]

Share



Photos



©TRAFFIC

*“If you are purchasing tortoiseshell or ivory pieces and are outside the EU you must have a CITES certificate in order to import the item into your country. We can obtain these on your behalf at a cost of GBP50 and these can take up to 14 working days to arrive at our office. Due to the strict exporting rules of these pieces, they may also come with further shipping costs. Please ensure you contact us prior to purchase for a quote.”*

Christie’s auction house also has a special notice about international trade on its website, stating that:

*“Several countries prohibit the importation of property containing materials from endangered species, including but not limited to coral, ivory and tortoiseshell; prospective buyers should familiarise themselves with relevant customs regulations prior to bidding if they intend to import this lot into another country”.*

Other auction houses such as *Sworders, Dreweatts* and *Woolley & Wallis* have similar wording in their terms of reference, stating that *“buyers intending to export goods should ascertain (a) whether an export licence is required and (b) whether there is any specific prohibition on importing goods of that character because, e.g. they may contain prohibited materials such as ivory.”*

These terms place the onus on the buyers and focus on items being (re-)exported from the EU, as in most cases these auction houses are selling antiques which fall under the worked specimen derogation (see section above on legislation), and therefore no documentation under the EU Wildlife Trade Regulations is required for commercial use within the EU. However, sellers offering worked antique ivory for sale should be able to justify have some form of proof that the specimen falls under the derogation and may be required to provide this proof when requested by authorities. Furthermore, not all antique items fall under the worked specimen derogation (i.e. if they are have not been sufficiently modified) and in these cases EU Wildlife Trade Regulation documentation is required for commercial use, even within the EU. There have been reported cases of auction houses putting ivory items up for auction without the appropriate documentation, e.g. in 2015 a silver mounted elephant tusk was put up for auction by Christie’s. Under the EU Wildlife Trade Regulations this is considered a raw unmodified tusk and therefore requires documentation prior to offering for sale; in May 2016, Christie’s auction house was fined GBP 3250 for this infringement (Anon, 2016).

## CITES TRADE IN IVORY: RE-EXPORTS AND IMPORTS

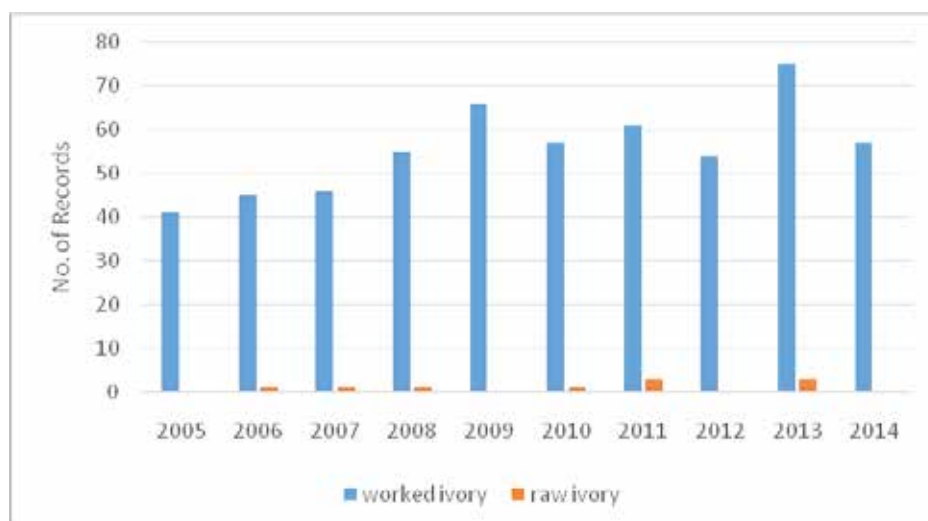
Trade data records from UNEP-WCMC's CITES trade database that pertain to the UK's and the EU's re-export and import of ivory were analysed. The analysis focused on trade in reportedly wild-sourced ivory (which includes the source codes I, O, U, W and blank) for commercial purposes (T and blanks); comparison with trade for personal purposes (P) was also made. The number of transaction records is used as the main basis of comparison, as many records involve the number of pieces of ivory (not weight), however the size of these pieces is generally unknown. The exception to this is the case of whole tusks, when the number of pieces can be used to provide an estimated weight range. Where provided, trade quantities reported by weight were also compared.

### Re-export of ivory from the UK

According to exporter data in the CITES trade database, there were a total of 567 records of re-exports of wild-sourced ivory for commercial purposes from the UK between 2005 and 2014. These records were composed of ~990 kg and ~54,000 specimens of ivory.

Re-exports for personal and commercial purposes together accounted for the majority of the ivory trade from of the UK (>84% in all years, according to (UK) exporter data). Trade for commercial purposes dominated ivory re-exports, totalling over 65% of re-export records from the UK between 2005 and 2014; while trade for personal purposes made up 25% of the trade during the same period. The remainder were mainly re-exported from the UK for exhibition purposes, and nominal re-export trade in ivory for education, scientific and hunting trophy purposes was also reported.

During 2005–2014, out of a total of 567 records of re-export of commercial wild-sourced ivory from the UK, 98% (557 records) involved worked ivory, and 2% (10 records) involved raw ivory (see Figure 2). The raw ivory records included 17 whole tusks (source declared as pre-Convention or unknown), equivalent to 59.5–127.5 kg by weight<sup>26</sup>. Analysis of the number of records suggests there has been a gradual increase in re-exports of both worked and raw ivory from the UK over the last decade (253/3 records for worked/raw ivory for 2005–2009, compared to 304/7 for 2010–2014).



**Figure 2: Number of records of re-export of wild-sourced worked and raw ivory for commercial purposes from the UK, 2005–2014, according to exporter data. Source: UNEP-WCMC CITES trade database. Wild-sourced ivory included that reported under source codes I, O, U, W and blank.**

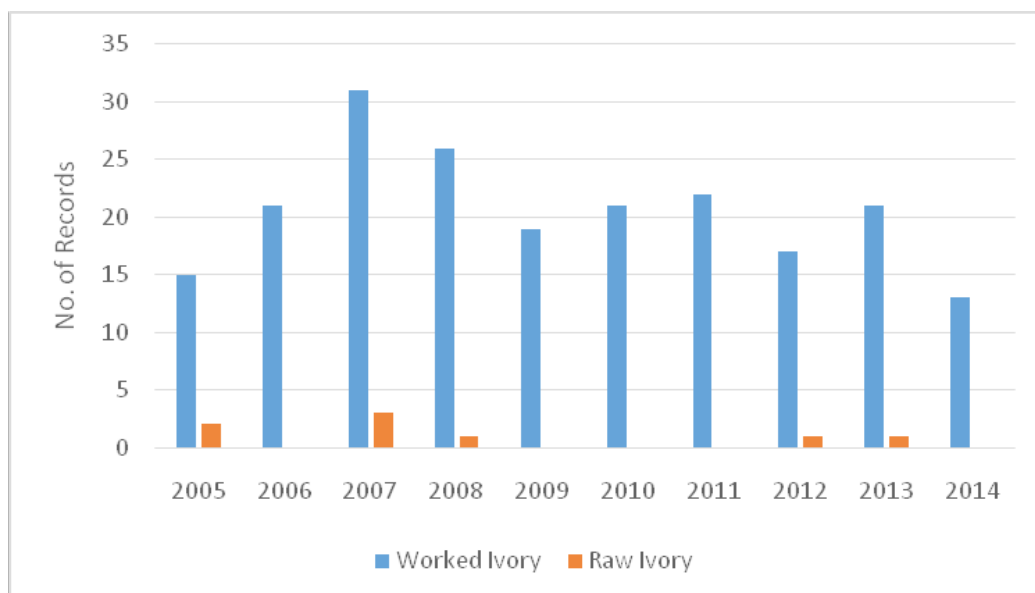
<sup>26</sup> Calculated using an estimate weight ranging between 3.5 kg/tusk and 7.5 kg/tusk (Mundy, 2014).

Wild-sourced ivory from the UK was re-exported for commercial and personal purposes to a large number of different countries in Asia, North America, Europe and the Middle East. According to number of records, overall, the USA was the top importer of UK ivory during the period 2005–2014 (22% of all records), with China (15%), Australia (14%), Switzerland (12%) and Canada (9%) also in the top five. When comparing the destinations of re-exports of worked specimens over the last decade, the number of actual specimens reportedly re-exported to the USA has declined from ~19,000 in 2005–2009 to ~11,000 in 2010–2014, and the number re-exported to mainland China has increased from ~2,000 to ~11,000.

### Import of ivory into the UK

There were a total of 214 records in the CITES trade database of imports of wild-sourced ivory for commercial purposes into the UK between 2005 and 2014 (made up of ~10 kg and 6,500 specimens), which represents 52% of the total number of records of ivory imports. A large proportion of ivory import transactions to the UK were for exhibition and personal purposes (22% and 15% of total ivory imports, respectively). The remainder were composed of imports as hunting trophies, for education and scientific purposes. As for re-exports, the large proportion of UK's ivory import records involved worked ivory. Records of raw ivory imports included 16 tusks (source declared as pre-Convention or seized) equivalent to 56–120 kg by weight<sup>27</sup>. The number of records of import of worked/raw ivory appear to have declined slightly over the years, with 112/6 records for 2005–2009, compared to 94/2 records during 2010–2014 (see Figure 3).

Between 2005 and 2014, the UK imported ivory from many countries across the world, including North America, Africa, Europe, the Middle East and Asia Pacific. According to the number of records, several of the main destinations for re-exports were also the principal source countries/territories for commercial ivory imports into the UK, with the USA, Switzerland, Jersey<sup>27</sup>, Australia and Canada making up over 55% of all import records.



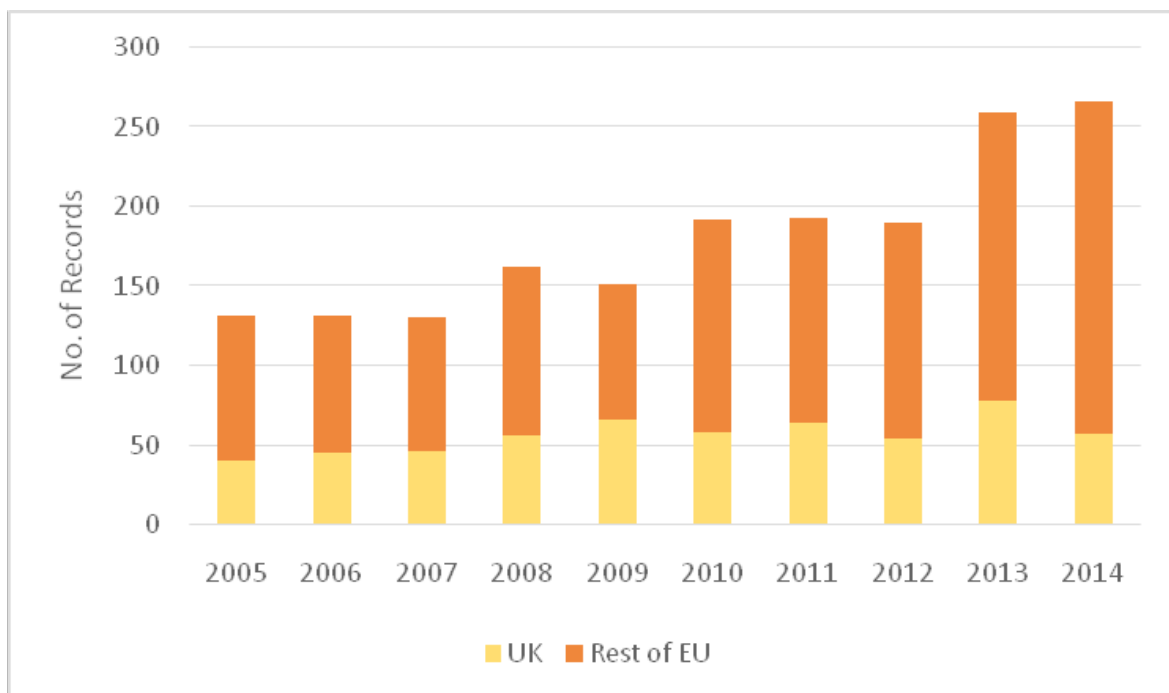
**Figure 3: Number of records of import of wild-sourced worked and raw ivory for commercial purposes into UK, 2005–2014, according to importer data. Source: UNEP-WCMC CITES trade database. Wild-sourced ivory included that reported under source codes I, O, U, W and blank.**

<sup>27</sup> One of the Channel Islands, Crown dependency of the United Kingdom.

## EU and UK re-exports and imports of ivory

When comparing number of records, in the CITES trade database, both the UK and the EU reported a greater number of re-exports of commercial wild-sourced ivory than imports in 2005–2014. The EU as a whole reported 1,808 re-export records, composed of ~7,600 kg and ~64,000 specimens of ivory, and 566 import records, composed of ~500 kg and ~11,500 specimens of ivory.

During 2005–2014, re-export records in the CITES trade database of wild-sourced ivory from the UK for commercial purposes made up 31% of the total re-export records for the EU as a whole (see Figure 4), and UK import records 38% of the EU total. The increase of re-exports over the last decade is more pronounced for the EU as a whole (than for the UK alone), increasing gradually from 132 records in 2005, to 192 records in 2010, and 266 records in 2014, according to the EU's exporter data (see Figure 4). This equates to a 55% increase in re-export records from the periods 2005–2009 to 2010–2014, compared to only a 21% increase for the UK. The small decline in ivory import records for the EU as a whole (12% difference between the two five year periods) was slightly less than the decline noted above for the UK (19%).



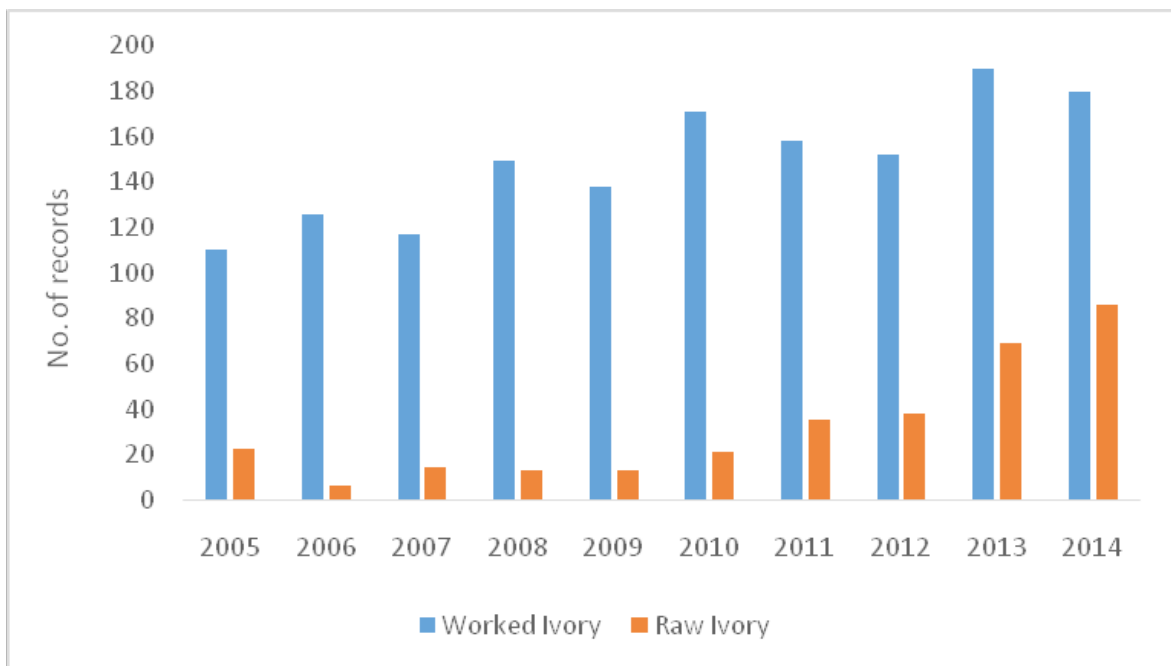
**Figure 4: Number of records/proportions of wild-sourced ivory re-exports for commercial purposes from the UK and the rest of the EU, 2005–2014. Source: UNEP-WCMC CITES trade database. Wild-sourced ivory included that reported under source codes I, O, U, W and blank.**

Eighty-two percent of the EU's ivory re-export records and 91% of the EU's ivory import records involved worked ivory specimens—18% and 9% of records therefore being for raw ivory respectively. The EU reportedly re-exported ~1,300 tusks (equivalent to 4,500 kg–9,800 kg<sup>22</sup>) and imported 56 tusks (equivalent to 200 kg–420 kg<sup>23</sup>) between 2005 and 2014. These are much higher numbers and proportions of raw ivory records/specimens than those recorded for the UK alone.

It is important to note that the rate of increase (between 2005–2009 and 2010–2014) in the number of re-export records from the EU, as well as for the UK specifically, were much greater for raw ivory (266% for EU; 133% for UK) than for worked ivory (33% for EU; 20% for UK). Of note is that the

number of EU re-export records of raw whole tusks increased steadily during 2005–2009, but then significantly increased between 2010 and 2014, from 14 records in 2010 to 81 records in 2014 (see Figure 5). Both the EU and the UK’s worked ivory imports declined by 16%, while for raw ivory, the EU actually increased its imports by 38%, while the UK decreased imports by 67% from the period 2005–2009 to 2010–2014.

The UK and EU reported re-exporting and importing ivory to/from a similar set of countries/territories in 2005–2014. The top countries importing ivory from the EU included the USA (which sourced 34% of its total EU ivory from the UK), as well as Australia (55% of EU ivory from UK) and Canada (41% of EU ivory from UK).



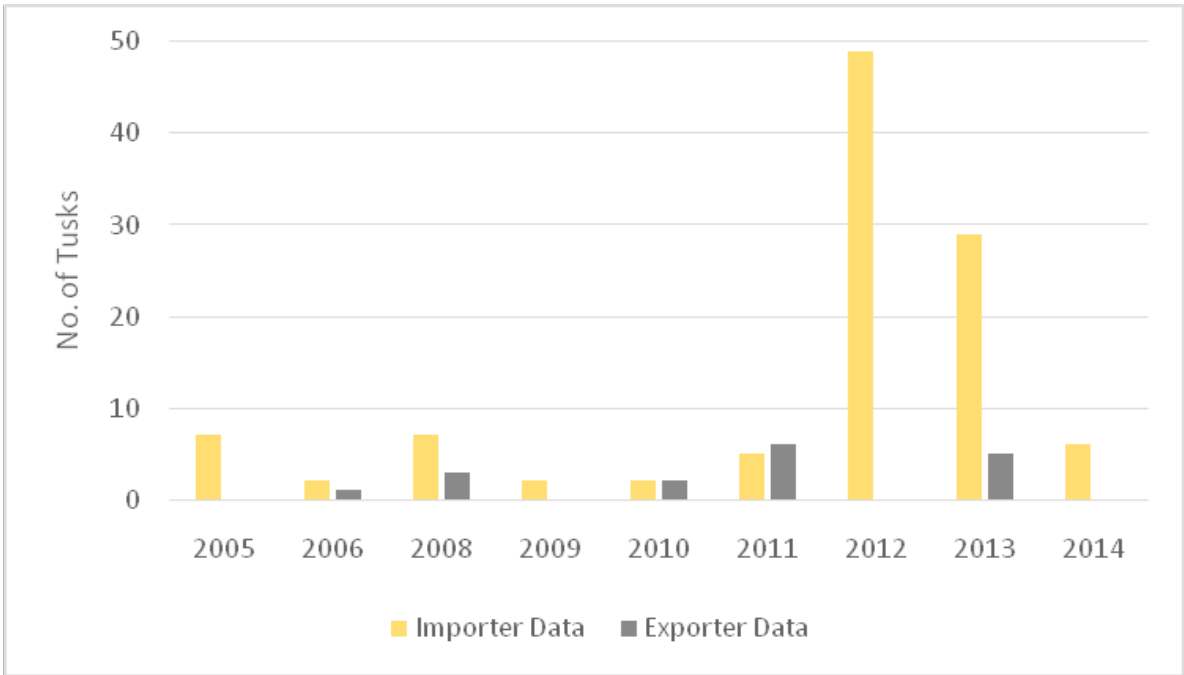
**Figure 5: Number of records of wild-sourced worked and raw ivory re-exports for commercial purposes from the EU, 2005–2014. Source: UNEP-WCMC CITES trade database. Wild-sourced ivory included that reported under source codes I, O, U, W and blank.**

### Discrepancies in UK trade according to importer and exporter data

The CITES trade database includes the trade records from importer and exporter countries/territories—these can highlight discrepancies in the number of transactions reported by trading countries. The total number of ivory re-export records reported by the UK for commercial purposes were almost double the number of records and specimens reported by importers during 2005–2014; 567 records in exporter data, composed of ~990 kg and ~ 54,000 specimens, compared to 274 records of importer data, composed of ~20 kg and ~26,500 specimens. This difference is mainly attributed to records of worked ivory, where exporter data had more than double the number of records every year compared to importer data, between 2005 and 2014 (except for in 2006).

In contrast, the UK reported fewer records of raw ivory re-exports than importing countries, with 10 records (composed of 49 specimens) and 58 records (composed of 585 specimens) during 2005–2014, based on exporter and importer data, respectively. For example, there were almost no reported

UK records of trade in “ivory pieces”, but there were 39 records of imports of ivory pieces from the UK according to importer data during the 2005–2014 period. The same discrepancy (number of records/total number of tusks according to importer data being greater than according to exporter data) is evident for the re-export of tusks (See Figure 6). The UK reported the re-export of 17 tusks for commercial purposes, compared to 109 tusks reported by importers. Specifically, importer data suggest that 38 tusks were re-exported from the UK to Macau and 11 from the UK to Hong Kong in 2012, and 28 tusks from the UK to Hong Kong in 2013, none of which were reported by the UK. It would be important to verify the reasons for these large differences. A number of records of trade in tusks from the UK to Switzerland(12), Jersey(2) and Australia(2) reported by importers in 2005–2014 were also not reflected in the UK’s exporter records.



**Figure 6: Number of wild-sourced tusks re-exported for commercial purposes from the UK, 2005–2014, according to importer and exporter data. Source: UNEP-WCMC CITES trade database. Wild-sourced ivory included that reported under source codes I, O, U, W and blank.**

There are also differences in the reported number of wild-sourced tusks imported into the UK for commercial purposes, when comparing importer and exporter data: the UK reported the import of 16 tusks, whereas (re-)exports of 45 tusks to the UK are reported in exporter data during the 2005–2014 period. This difference can mainly be explained by the one record of re-export of 31 tusks by Canada in 2013, not reported by the UK.

Records of certain trading countries/territories have particularly large discrepancies with UK records. Hong Kong consistently reports more wild-sourced ivory commercial trade records than the UK, whether for re-exports or imports. Conversely, the UK tends to report more wild-sourced ivory commercial trade records than mainland China for both re-exports and imports. Australia reports considerably more commercial ivory imports from the UK, and much less in re-exports to the UK. Overall data discrepancies are more prevalent in relation to UK re-exports, and countries that report substantially less equivalent ivory imports include Qatar, Singapore and Russia (all of which have



submitted their CITES annual reports for these years). Reasons for such discrepancies could include exporters/importers reporting the same transactions using different trade terms (possibly “carving” or “ivory carving” being used by the UK, given the much greater number of records for these terms in exporter than importer data) or importers reporting based on permits issued, but not used. It would be important to clarify the reasons behind these discrepancies, in particular those related to raw ivory.

## UK IVORY SEIZURES

Between 2010 and 2014, some 154 seizure records (on average 30.8 seizures per year) were reported by the UK to ETIS, representing a total of 345.5 kg in raw ivory equivalent (RIE) weight. For comparative purposes, Germany reported 236 seizures (753.03 kg RIE), and France 268 seizures (1,561.38 kg RIE) during the same period, according to ETIS data. The number of UK seizures between 2010 and 2014 increased considerably when compared to seizures from the previous five-year period, when 75 seizure records, totalling 134 kg RIE, were reported by the UK (an average of 15 seizures per year).

2012 was a record year for ivory seizures reported by the UK to ETIS, with the highest number of ivory seizure cases and equivalent weight compared to all other years during the period 2005 to 2014 (see Figures 6 and 7). Forty-five seizure cases occurred in that year alone, representing 84 kg RIE of ivory. Part of the seized ivory was a 15 kg consignment that was sent by freight in 2012, containing hundreds of carved items that included bangles, pendants, beads and name seals. The consignment was smuggled out of Nigeria, and was heading to Hong Kong and Guangzhou in China (Border Force, 2012).

However, seizures that have been reported to ETIS so far were dwarfed by the UK’s largest seizure of illegal ivory in 2015. In October 2015, a total of 110kg of ivory, including tusks, carved bangles and beads, was found in abandoned baggage in transit from Angola and seized at Heathrow Airport (BBC, 2015). This seizure was reportedly destined for Germany and differed from other previous seizures in the EU (with the EU as a destination), which are typically small amounts of ivory smuggled for personal use (Mundy, 2014). This single seizure had more ivory, in terms of total volume, than the annual seizure totals in the previous 10 years.

In both these examples, the UK was a transit country for consignments en route from Africa (Nigeria and Angola) to Asia or Europe (China and Germany). Seizures of this scale involving the UK are not typical. According to ETIS data, the majority of seizure cases over the last decade with the UK as the presumed final destination, involved the smuggling of 1–2 pieces of ivory (over 80% of seizure cases). This is in line with a broader assessment of the EU, which appears to play a relatively small role in large-scale illegal transactions of ivory compared to other regions (Underwood *et al.*, 2013; Mundy, 2014).

In 2015, the UK Border Force (UKBF) ran an operation specifically targeting postal parcels en route to China in search of ivory items. During this operation, the UK reported over 150 seizure records of ivory items (mostly antiques) being shipped to China in postal parcels, with one parcel containing 22 kg ivory carvings. While this has been described as a new phenomenon compared to 2014, it is important to note that this may have been occurring for many years but was discovered as a result of proactive action from the UKBF (TRAFFIC, 2016).

Figures 7 and 8 show not only seizures that were made in the UK, but also those made in other countries that involved the UK either as a country of export/re-export, transit, or destination. Between 2010 and 2014, there was a slightly higher number of seizure cases reported by the UK (154 cases) compared to seizures reported by other countries and involving the UK (151 cases). However, total volumes of seizures made by other countries (but involving the UK) in 2010–2014 were higher (412

kg RIE) compared with seizures made by the UK (346 kg RIE). Seizures that were made by other countries but involving the UK included shipments that could have potentially been seized in the UK during transit or in export—greater international co-operation and information exchange ensures that countries involved, in this case the UK, are informed of such seizures and associated information can help inform national enforcement efforts through risk assessments and profiling.

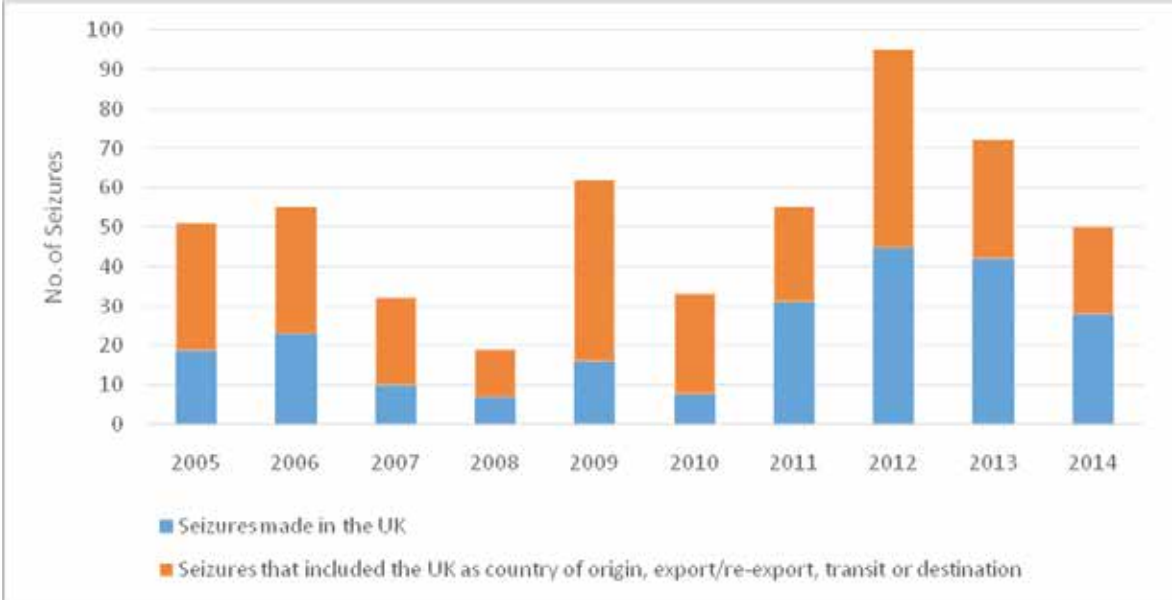


Figure 7: Number of seizures made in the UK and number of seizures involving the UK, but made in other countries/territories, 2005–2014. Source: ETIS data.

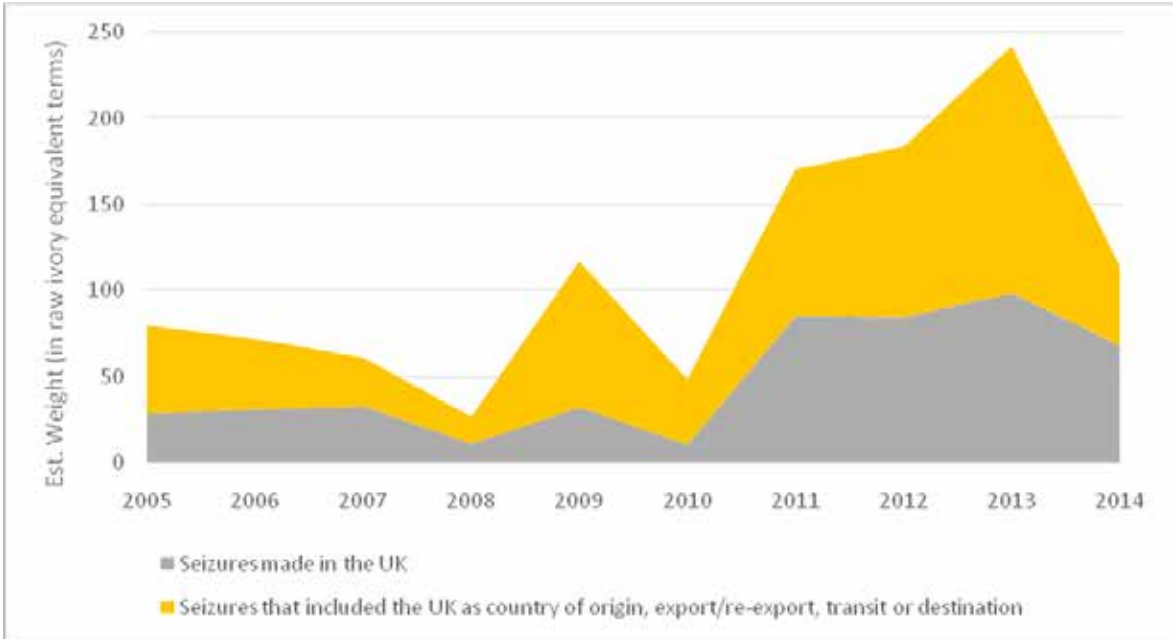


Figure 8: Estimated weight of seizures made in the UK and seizures involving the UK, but made in other countries, calculated in raw ivory equivalent (RIE), kg, 2005–2014. Source: ETIS data.

## DISCUSSION and CONCLUSIONS<sup>28</sup>

The 2016 physical and online market surveys in London confirmed the ongoing availability of ivory in the UK market. Antique (reported as pre-1947) ivory items were on offer for sale across all 13 antiques markets and two areas of antiques shops surveyed. No evidently new or raw (“unworked”) ivory was seen in any of the physical markets or antiques shops, or in the online antiques shops, marketplaces or auctions—only one ivory item seen in the physical markets was reportedly produced post-1947 (in 1969).

When comparing the results with those found in 2004, there appears to have been a significant reduction in the total number of stalls in London markets offering ivory items for sale, from ~640 in 2004 to 200 in 2016. Declines in the number of ivory items for sale in physical markets are also evident, reducing by nearly 50%, from ~6,000 items in 2004 to 3,200 in 2016, however the average number of ivory items displayed per outlet appears to have increased by 60%, from 10 ivory items in 2004 to 16 ivory items in 2016. It is important to note that the surveys of London’s physical markets conducted in 2004 and 2016 were not exact replicates, and any comparison needs to be assessed with some caution. Generally, the majority of traders displayed only a few ivory items for sale, however there were a number of ivory specialists, stocking between 100 and 500 distinct pieces.

The range of product types seen in 2016 were similar to those in 2004 with figures (including netsukes), household goods (specifically magnifying glasses, cutlery, and walking canes) and items of jewellery (specifically brooches, bangles and pendants) the most popular items offered for sale in 2004 and 2016. Traders generally had at least some knowledge about individual pieces, their age and provenance, and were generally more concerned with craftsmanship, style of carving and the era and/or provenance of antiquity as indicators of quality and value rather than the material the item was composed of. In many cases there was little difference in the price of items composed of ivory and other similar materials.

The snapshot survey of the online antiques ivory market confirmed the variety of ivory items available in the UK, with ~700 lots of ivory items and ~1,700 ivory items being offered for sale on two auction consolidation sites and six online antiques marketplaces at one point in time in April 2016. Declines in the number of physical stalls displaying and offering ivory items for sale might be explained in part by the high number of online sales (not an option in 2004) that facilitate direct trade with certain overseas markets, combined with an overall reduction in the number of antique dealers in the UK over the last decade. Traders at physical markets also noted that ivory items were being offered at reduced prices due to the imposition of stricter legislation, which had subsequently reduced demand.

Based on the information collected during the 2016 surveys, all dealers were aware that trade of antique ivory items was permitted, however the level of knowledge and compliance with current legislation varied significantly. In general, casual and/or opportunistic dealers were limited in their understanding of current legislation, yet high end dealers/auction house appeared more knowledgeable and compliant, in particular with the need for permits to export ivory from the EU and the fact that individuals were not permitted to take ivory to the USA or mainland China due to stricter domestic legislation there.

Other dealers were moderately knowledgeable regarding the trade of pre-1947 ivory items, yet several declared that anyone was able to purchase ivory items with no need for documentation to export

---

<sup>28</sup> At the time of writing this report a referendum on EU membership was held (on 23rd June 2016) and the UK voted to leave the EU. This could have implications on the current legislation controlling trade in ivory and the UK ivory market in the future, however this was not considered in more detail here due to the many unknowns at present.

the pieces. Many were also aware of the existence of some trade controls/restrictions, yet suggested smuggling the items in personal luggage or sending them by post. Of note is that very few dealers were able to provide proof of age or documentation to prove legal acquisition. A simple mandatory declaration system (as currently used by one online marketplace *Selling Antiques*) requiring a formal declaration of the approximate date of manufacture could potentially help to solve this issue for the sector as a whole. Many antiques dealers appeared to source much of their legal information/general awareness over changes in legislation from the Antiques Trade Gazette.

According to Martin and Stiles (2005), buyers in UK physical markets were once dominated by American and European tourists. In 2016 many traders reported that it is increasingly travellers/citizens from East Asian countries/territories, including mainland China, Japan and Hong Kong, purchasing ivory items. Furthermore, researchers spoke to a number of Chinese buyers who claimed to come to the UK regularly to purchase ivory and other antique items and take them back to China. Two Chinese speaking “scouts” were seen recording information on antiques, including ivory items, for sale at Portobello Market and sending this on to prospective buyers. Information collected from both traders and buyers from East Asia suggested that people are taking antique ivory out of the EU without the required documentation, in their personal luggage (hand or check in) or alternatively sending items in postal parcels.

Analysis of CITES trade data for elephant ivory showed that over the last decade the UK has been a net exporter of wild-sourced ivory for commercial purposes. According to UK export data, between 2005 and 2014, ~990kg and ~54,000 specimens of ivory were re-exported for commercial purposes from the UK. The majority of trade was in worked ivory (carvings and ivory carvings), with only 2% involving raw ivory. Raw ivory re-exports included 17 whole tusks (source declared as pre-Convention or unknown) for commercial purposes. Of note is that importer data show far higher numbers of whole ivory tusks re-exported from the UK between 2005 and 2014 (109 tusks). According to stricter UK domestic measures, only worked specimens (antique or pre-Convention) can be legally re-exported for commercial purposes, and therefore it would be essential to clarify the reasons for/ discrepancy between records of UK raw ivory re-exports held in the CITES trade database.

Re-export records of ivory for commercial purposes from the UK made up 31% of the total for the EU. Although also predominantly composed of worked specimens, 18% of the EU’s reported re-export records involved raw ivory (~1,300 tusks) between 2005 and 2014. These are much higher numbers and proportions of raw ivory records/specimens than those recorded for the UK alone. Analysis of the number of records suggests there has been a gradual increase in re-exports of both worked and raw ivory from both the UK and the EU over the last decade—the rate of increase was greatest for raw ivory (266% for the EU as a whole between 2005 and 2014).

The principal destinations for ivory re-exported from the UK over the last decade were the USA, mainland China, Australia, Switzerland and Canada. However, the number of actual specimens reportedly re-exported to the USA has nearly halved between 2005–2009 and 2010–2014 (from ~19,000 to ~11,000) and the number re-exported to mainland China increased from ~2,000 to ~11,000. Information collected from traders in the 2016 survey support this shift in principal destinations for antique ivory items.

Seizure data show that the UK is also an import, re-export and/or transit country for illegal ivory trade, with an increase in ivory seizure records reported by the UK in recent years (an average of 15 annual seizure records, totalling 134 kg raw ivory equivalent reported for 2010–2014). There have been a number of seizures of new and/or antique carved items—in 2015, the UKBF recorded over 150 seizures of ivory carvings in postal parcels en route to China, through targeted inspections and searches.

Although the physical and online market surveys carried out for this study did not find any new ivory for sale or clear indications of illegal activity, a number of traders and buyers indicated their knowledge/intention of taking antique ivory items out of the EU without the necessary documentation, and hence illegally. Lack of awareness and/or clarity over the UK's and destination regulations on ivory trade and the specifics surrounding the antiques (pre-1947) derogation under the EU Wildlife Trade Regulations, appear to play a major role in this.

## RECOMMENDATIONS

The UK CITES Management and Enforcement authorities are encouraged to:

- Compile simple information/guidance on the current and planned/upcoming legislation and documentation requirements, definitions/examples of “worked” antique specimens, burden of proof and best practice related to commercial antique ivory use and trade in the UK, and specific domestic measures in important previous/current destinations for antique ivory sourced in the UK, such as the USA and China
- Share this information/guidance via the UK CITES MA website in addition to information sources regularly used by antique dealers and auction houses, such as the Antiques Trade Gazette
- Raise awareness of tourists, in collaboration with CITES authorities in destination countries/territories, regarding rules for purchasing ivory in the UK and its transportation across borders, through tour operators and airlines and targeted signage in relevant airport terminals
- Explore the possibility of making declarations regarding the age and acquisition of all ivory items, both on websites and in physical stalls/shops, mandatory in the UK
- Continue to target ivory-related Customs inspections on shipments in postal and courier services destined for East Asia and luggage of those travelling to the region, and consider extending this targeting to other previously important destinations for ivory sourced in the UK, such as the USA
- Research and clarify the discrepancies between importer/exporter-reported CITES trade of ivory (raw ivory in particular) from the UK over the last decade

The UK CITES Management and Enforcement authorities, in collaboration with authorities in other EU Member States and other experts such as university researchers and non-governmental organizations, are encouraged to:

- Fund and plan regular, systematic and comprehensive market monitoring of all types of ivory on offer for sale, including antique, pre-Convention and new, both in the UK and other EU Member States
- Continue to monitor online sales of ivory in the UK and carry out an assessment of the ivory trade on social media platforms in the UK and the EU to determine if trade in ivory is prevalent on these platforms
- Strengthen co-operation with e-commerce companies to research and develop innovative ways to prevent illegal online trade in ivory and other endangered species in the future.

## REFERENCES

Anon. (2016). *Christie's fined over elephant ivory sale*. Expatica. [http://www.expatica.com/uk/news/Christies-fined-over-elephant-ivory-sale\\_686892.html](http://www.expatica.com/uk/news/Christies-fined-over-elephant-ivory-sale_686892.html)

Arkell, R. (2015). Research project begins into effect of total ivory ban in the UK. *Antiques Trade Gazette*. <https://www.antiquestradegazette.com/news/2015/research-project-begins-into-effect-of-total-ivory-ban-in-the-uk/>

BBC (2015). *Ivory haul at Heathrow Airport: 'Seizure one of UK's biggest'*. Available at: <http://www.bbc.co.uk/news/uk-england-london-34905000>.

Blanc, J. (2008). *Loxodonta africana*. The IUCN Red List of Threatened Species 2008: e.T12392A3339343. <http://dx.doi.org/10.2305/IUCN.UK.2008.RLTS.T12392A3339343.en>. Downloaded on 17th June 2016

Border Force (2012). *Border Force seizes illegal ivory*. Available at: <https://www.gov.uk/government/news/border-force-seizes-illegal-ivory>. Downloaded on 17th June 2016.

Choudhury, A., Lahiri Choudhury, D.K., Desai, A., Duckworth, J.W., Easa, P.S., Johnsingh, A.J.T., Fernando, P., Hedges, S., Gunawardena, M., Kurt, F., Karanth, U., Lister, A., Menon, V., Riddle, H., Rübel, A. and Wikramanayake, E. (IUCN SSC Asian Elephant Specialist Group) (2008). *Elephas maximus*. The IUCN Red List of Threatened Species 2008: e.T7140A12828813. <http://dx.doi.org/10.2305/IUCN.UK.2008.RLTS.T7140A12828813.en>. Downloaded on 17th June 2016.

CITES (2015). *Elephant Poaching Rates Virtually Unchanged in 2014* [press release]. 23rd March. [https://cites.org/eng/mike\\_figures2014](https://cites.org/eng/mike_figures2014) (accessed 22nd June 2016).

CITES (2016). *China: provisional measures on the suspension of import of tusks and ivory carvings of elephants*. Notification to the Parties No. 2016/034. 1st April 2016. <https://cites.org/sites/default/files/notif/E-Notif-2016-034.pdf> (accessed 22nd June 2016).

CITES Secretariat (2013). *Monitoring of Illegal Trade in Ivory and Other Elephant Specimens*, CITES Sixteenth Meeting of the Conference of the Parties, Bangkok, Thailand, March 3-14, 2013. CoP16 Doc. 53.2.2. <https://cites.org/sites/default/files/eng/cop/16/doc/E-CoP16-53-02-02.pdf> (accessed 22nd June 2016).

DL Piper UK LLP (2016). *Illegal wildlife trade UK ivory laws*. A report prepared by DLA Piper UK LLP for The Royal Foundation and United for Wildlife.

Environment Bureau/Agriculture, Fisheries and Conservation Department (AFCD, 2016). *Proposed Plan for Phasing Out the Local Trade in Elephant Ivory*. Legislative Council Panel on Environmental Affairs. 27th June 2016.

European Commission and TRAFFIC(2015). *Reference Guide to the European Union Wildlife Trade Regulations*. Brussels, Belgium.

European Commission (2016a). *Commission Staff Working Document: Analysis and Evidence in support of the EU Action Plan against Wildlife Trafficking*. SWD(2016) 38 final.

European Commission (2016b). *EU Action Plan against Wildlife Trafficking*. COM(2016) 87 final. <https://ec.europa.eu/transparency/regdoc/rep/1/2016/EN/1-2016-87-EN-F1-1.PDF> (accessed 25th May 2016).

International Fund for Animal Welfare (IFAW, 2014). *Wanted – Dead or Alive: exposing online wildlife trade*. <http://www.ifaw.org/sites/default/files/IFAW-Wanted-Dead-or-Alive-Exposing-Online-Wildlife-Trade-2014.pdf> (accessed 11th May 2016).

Martin, E. (2001). The Great White Gold Rush in Africa. *BBC History*, 2 (8), 30-32.

Martin, E. and Stiles, D. (2000). *The Ivory Markets of Africa. Save the Elephants*, Nairobi and London.

Martin, E. and Stiles, D. (2002). *The South and South East Asian Ivory Markets*. Save the Elephants, Nairobi and London.

Martin, E. and Stiles, D. (2003). *The Ivory Markets of East Asia. Save the Elephants*, Nairobi and London.

Martin, E. and Stiles, D. (2005). *The Ivory Markets of Europe*. Care for the Wild International: West Sussex; Save the Elephants: London.

Milliken, T., Burn, R.W., Underwood, F.M. and Sangalakula, L. (2012). *The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 16th meeting of the Conference of the Parties to CITES*. CoP16 Doc. 53.2 (Rev. 2). CITES, Geneva, Switzerland.

Mundy, V. (2014). *The Re-export of pre-Convention/antique ivory from the European Union*. Report prepared for the European Commission.

TRAFFIC (2016). Overview of important international seizures in the European Union, January to December 2015. Compiled by TRAFFIC on behalf of the European Commission.

Sollund, R., Maher, J. (2015). *The Illegal Wildlife Trade: a case study report on the illegal wildlife trade in the United Kingdom, Norway, Colombia and Brazil*. Work Package 4 “Case Studies”. European Union Action to Fight Environmental Crime (EFFACE).

Underwood, F.M., Burn, R.W. and Milliken, T. (2013). Dissecting the Illegal Ivory Trade: An Analysis of Ivory Seizures Data. *PLoS ONE* 8(10): e76539. doi:10.1371/journal.pone.0076539.

UNEP WCMC (2013). A guide to using the CITES Trade Database. Version 8.

UNEP, CITES, IUCN, TRAFFIC (2013). *Elephants in the Dust – The African Elephant Crisis. A Rapid Response Assessment*. United Nations Environment Programme, GRID-Arendal. [www.grida.no](http://www.grida.no)

US Fish & Wildlife Service (USFWS, 2016). Administration Takes Bold Step for African Elephant Conservation: completes near-total elephant ivory ban to cut off opportunities for traffickers [press release]. 2 June. [https://www.fws.gov/news/ShowNews.cfm?ref=administration-takes-bold-step-for-african-elephant-conservation:-&\\_ID=35686](https://www.fws.gov/news/ShowNews.cfm?ref=administration-takes-bold-step-for-african-elephant-conservation:-&_ID=35686) (accessed 22nd June 2016).

Williamson, P. (2011). Ivory Carvings in England from Before the Norman Conquest. Last updated: 17th February 2011. [http://www.bbc.co.uk/history/british/normans/ivory\\_01.shtml](http://www.bbc.co.uk/history/british/normans/ivory_01.shtml) (accessed 23rd May 2016).

Woodhouse, C. (1976). *Ivories: A History and Guide*. David & Charles, London.



# Appendix 1

## Number of Outlets and Ivory Items per Outlet

Market/area	Martin & Stiles (2005)					Current Study (2016)				
	No. of outlets	No. of outlets with ivory	% of outlets with ivory	No. of ivory items	% of market total	No. of outlets	No. of outlets with ivory	% of outlets with ivory	No. of ivory items	% of market total
Portobello Road Antiques Market	832	328	39%	2,973	50%	500	81	16%	1,414	45%
Camden Passage Antiques Market	136	62	46%	653	11%	25	13	52%	654	21%
Grays Mews Market	61	12	20%	89	1%	50	10	20%	279	9%
Royal Horticultural Hall Antiques Fair	139	94	68%	739	12%	150	42	28%	217	7%
Grays Antiques Market	80	20	25%	367	6%	60	11	18%	204	6%
Bourbon-Hanby Antiques Centre	17	3	18%	115	2%	7	5	71%	146	5%
The Kensington Antiques Centre	13	3	23%	12	0%	8	5	63%	61	2%
Alfies Antiques Market	118	16	14%	263	4%	67	6	9%	48	2%

Market/area	Martin & Stiles (2005)				Current Study (2016)					
	No. of outlets	No. of outlets with ivory	% of outlets with ivory	No. of ivory items	% of market total	No. of outlets	No. of outlets with ivory	% of outlets with ivory	No. of ivory items	% of market total
Covent Garden Market - Jubilee Market Hall	112	15	12%	56	1%	100	5	6%	43	1%
Covent Garden Market - Apple Market	44	3			0%	50	0	0%	0	0%
Bermondsey Antiques Market	223	60	27%	552	9%	60	9	15%	40	1%
Hampstead Antique & Craft Emporium	18	6	33%	38	1%	25	3	12%	26	1%
Spitalfields Market	62	19	31%	144	2%	150	3	4%	9	0%
<b>TOTAL</b>	<b>1,855</b>	<b>641</b>		<b>6,001</b>		<b>1,252</b>	<b>193</b>		<b>3,141</b>	
Kensington Church St.		16		792	86%	30	9	30%	249	86%
Mayfair area (Piccadilly, New/Old Bond Streets.)		12		133	14%		4		42	14%
<b>Grand TOTAL</b>		<b>669</b>		<b>6,926</b>			<b>206</b>		<b>3,432</b>	

## Appendix 2

### Quantities and Prices by Type of Ivory Items

Item	Size category	Quantity	% of total	Price range in GBP
<b>JEWELLERY</b>				
Brooch	2	88	2.6	14-350
Bangle/Bracelet	2	80	2.3	25-250
Pendant	2	78	2.3	25-170
Necklace – medium	3	36	1.0	25-160
Earrings (pair)	1	26	0.8	10-25
Necklace–small	2	12	0.3	25-75
Cross–medium	3	4	0.1	
Cross–small	2	2	0.1	
<b>FIGURES</b>				
Figure – medium	3	785	22.9	15-3,850
Figure – small	2	513	14.9	35-15,000
Netsuke	2	422	12.3	89-350
Figure – large	4	187	5.4	1,200-18,000
Carved tusk	4	13	0.4	1800
Cantonese magic ball	3	3	0.1	140-800
<b>HOUSEHOLD GOODS</b>				
Magnifying glass (handle)	2	247	7.2	15-200
Cutlery – small (handle)	2	143	4.2	9
Box – small	2	73	2.1	35-2,500
Paper knife/letter opener	3	52	1.5	15-135
Box – medium	3	40	1.2	48-22,000
Vase – large	4	40	1.2	2,800-3,000
Page turner	3	36	1.0	85-550
Cutlery – medium (handle)	3	35	1.0	10-195
Cutlery set (handles)	5	34	1.0	24-8,000
Vase – medium	3	30	0.9	
Pen knife (handle)	2	21	0.6	
Furniture with inlay (medium)	3	16	0.5	9,500
Picture/mirror frame	3	16	0.5	40-100
Sewing accessories	2	15	0.4	
Stamp	2	10	0.3	125
Napkin ring	2	9	0.3	
Ruler – medium	3	9	0.3	170
Chess set	5	9	0.3	80-2,200
Sewing bobbins	1	8	0.2	
Furniture (veneered >90% by ivory)	4	6	0.2	12,000-34,500
Knife (handle)	2	6	0.2	12-375
Mirror	4	6	0.2	

Item	Size category	Quantity	% of total	Price range in GBP
<b>HOUSEHOLD GOODS cont.</b>				
Tray	3	6	0.2	460
Furniture with inlay (small)	2	5	0.1	12,000
Candle snuffer	3	4	0.1	
Tea caddy	3	4	0.1	8,500–10,000
Tea/chocolate pot (handle)	2	4	0.1	110–250
Snooker ball	2	4	0.1	
Candlestick (pair)	3	3	0.1	9,000
Ruler – small	2	3	0.1	28–69
Shoe horn	2	3	0.1	50–100
Bowl (handles)	2	2	0.1	
Salt and Pepper set	2	2	0.1	
Alphabet set	3	2	0.1	150–225
Dice cup/set	2	2	0.1	
Panel	2	2	0.1	1,200
Sail Creaser	3	2	0.1	
Thermometer	2	2	0.1	
Box – large	4	1	0.0	500
Candlestick (pair)	4	1	0.0	16,000
Chopsticks (pair)	2	1	0.0	
Clock	3	1	0.0	3,200
Cutlery – other	3	1	0.0	7,000
Fly whisk	2	1	0.0	
Calendar	3	1	0.0	950
Counter set	5	1	0.0	
Toy set	5	1	0.0	
<b>PERSONAL ITEMS</b>				
			<b>7.7</b>	
Walking cane (handle)	2	86	2.5	250–1,400
Fan – medium	3	43	1.3	600–1,500
Aide memoire/card case	2	18	0.5	70–245
Fan – small	2	14	0.4	650
Sword (handle)	3	11	0.3	950
Hunting knife (handle)	3	10	0.3	
Clothes brush	3	10	0.3	10
Hairbrush	3	10	0.3	15
Miniature painting	2	8	0.2	850–1,200
Glove stretcher	3	7	0.2	12.50–15
Pipe	2	6	0.2	
Baby rattles/dummy (ring)	2	5	0.1	
Whistle	2	5	0.1	500–800
Vanity set (complete)	5	5	0.1	225
Cigarette holder	2	4	0.1	50
Umbrella (handle)	2	4	0.1	170
Binoculars	2	3	0.1	150
Parasol (handle)	3	3	0.1	140–395
Pistol	2	3	0.1	12,000
Gavil	2	2	0.1	
Bible	3	1	0.0	
Perfume bottle	3	1	0.0	4,000
Purse	2	1	0.0	140
Conductor baton	3	1	0.0	
Mask	3	1	0.0	1,000
Notebook	2	1	0.0	40
<b>TOTAL</b>				
		<b>3432</b>	<b>100</b>	

## Appendix 3

### Survey Results of Antique Auctions Websites

ANTIQUA AUCTIONS (via The Saleroom and Barnebys)	Website	Total no. of ivory items	Price ranges (GBP)
Woolley & Wallis	Saleroom ( <a href="http://www.the-saleroom.com/en-gb">http://www.the-saleroom.com/en-gb</a> )	54	
Bamfords Auctioneers & Valuers	Saleroom	49	
Canterbury Auction Galleries	Saleroom	47	
Dreweatts	Barnebys ( <a href="https://www.barnebys.co.uk/">https://www.barnebys.co.uk/</a> )	43	
Lawrences Auctioneers of Crewkerne	Saleroom	41	
Reeman Dansie	Saleroom	27	
Bearnes Hampton & Littlewood	Saleroom	25	
Lindsay Burns & Company	Saleroom	25	
Christie's	Barnebys	23	
Tooveys	Barnebys	22	
Tennants Auctioneers	Saleroom	20	
Christie's South Kensington	Saleroom	18	
Lukehoney	Barnebys	17	
Lyon & Turnbull	Saleroom	16	
Island Auction Rooms	Saleroom	15	
Mendip Auction Rooms	Saleroom	13	
Special Auction Services	Saleroom	12	
Burstow & Hewett	Saleroom	11	
Semley Auctioneers	Saleroom	11	
Bishop & Miller Auctioneers Ltd	Saleroom	10	
Warren & Wignall Ltd.	Saleroom	10	
Nigel Ward & Company	Saleroom	10	
Others (53 auction houses)	Saleroom or Barnebys	176	
<b>Sub-totals</b>	<b>Saleroom</b>	<b>578</b>	<b>30–8,000</b>
	<b>Barnebys</b>	<b>117<sup>29</sup></b>	<b>40–40,000</b>
<b>TOTAL for Auction Houses</b>		<b>695</b>	

<sup>29</sup> This number excludes duplicated ivory lots (301 in total) that were also found on The Saleroom.

## Appendix 4

### Survey Results of Online Antique Marketplaces

ONLINE ANTIQUE MARKETPLACE	Website	Total no. of antique dealers (unique dealers)	Total no. of ivory items (unique ivory items)	Price Range (GBP)
Antique Atlas	<a href="http://www.antiques-atlas.com/">http://www.antiques-atlas.com/</a>	100 (94)	734 (731)	20–7,500
Online Galleries	<a href="http://www.onlinegalleries.com/">http://www.onlinegalleries.com/</a>	66 (46)	606 (454)	95–75,000
British Antiques Dealers Association (BADA)	<a href="http://www.bada.org/">http://www.bada.org/</a>	39 (24)	336 (265)	175–35,000
Selling Antiques	<a href="http://www.sellingantiques.co.uk/">http://www.sellingantiques.co.uk/</a>	67 (51)	231 (163)	100–34,500
Antiques.co.uk	<a href="https://www.antiques.co.uk/">https://www.antiques.co.uk/</a>	12 (11)	98 (94)	25–1,695
The Hoarde	<a href="http://www.thehoarde.com/">http://www.thehoarde.com/</a>	1(1)	3 (3)	38–130
<b>TOTAL</b>		<b>285 (227)</b>	<b>2008 (1,710)</b>	



TRAFFIC, the wildlife trade monitoring network, is the leading non-governmental organization working globally on trade in wild animals and plants in the context of both biodiversity conservation and sustainable development.

For further information contact:

TRAFFIC

Headquarters Office

David Attenborough Building

Pembroke Street

Cambridge CB2 3QZ

UK

Telephone: (44) (0) 1223 277427

Fax: (44) (0) 1223 277237

E-mail: [traffic@traffic.org](mailto:traffic@traffic.org)

Website: [www.traffic.org](http://www.traffic.org)

UK Registered Charity No. 1076722,  
Registered Limited Company No. 3785518.

This document was published  
with the kind support of

