



**Report on EU ivory Trade for circulation to Hong Kong lawmakers**

Daniela Freyer to: bc\_06\_16@legco.gov.hk

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Dear Mr Kenneth Leung, Chairman of the Bills Committee on Protection of Endangered Species of Animals and Plants (Amendment) Bill 2017,

my name is Daniela Freyer of Pro Wildlife, an organisation committed to wildlife conservation, based in Germany. We note with grave concern the ongoing discussions between Hong Kong lawmakers and government officials in the two meetings of the Bills Committee on Protection of Endangered Species of Animals and Plants (Amendment) Bill 2017.

We would like to submit to the Bills Committee our attached report entitled: 'EU IVORY TRADE: THE NEED FOR STRICTER MEASURES'. This document was submitted to the European Commission earlier this year by a broad coalition of wildlife conservation and animal welfare NGO's, many of whom are based in Europe, but also in other parts of the world, including WildAid in Hong Kong. It highlights problems related to the trade of ivory into, out of and within Europe and calls on the EU to establish a comprehensive ban on ivory trade.

We believe that our paper could be useful to Hong Kong lawmakers in order to inform their debates and help them make informed decisions, when the Hong Kong ivory ban bill goes to a vote.

In that regard, we would greatly appreciate it if you could kindly circulate our report to all Hong Kong Legislative Council members.

We would be happy to answer any questions raised by lawmakers on this matter of critical importance to the survival of Africa's last remaining elephant populations, and Hong Kong's role in saving them.

Many thanks.

Kind regards,  
Daniela Freyer

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VRN 16423, Amtsgericht München.

Vorstand: Andrea Höppner, Dr. Klaus Leonhard, Gerhild Abler und Dr. Christoph Schmidt



## EU IVORY TRADE: THE NEED FOR STRICTER MEASURES

Paper submitted to the European Commission, January 2017 on behalf of:



Cover photograph: consignment of raw ivory tusks at premises of a Hong Kong ivory trader in 2016, including tusks cross referenced to 2015 Belgian CITES documents alongside unmarked ivory (© Alex Hofford)

## EU IVORY TRADE: THE NEED FOR STRICTER MEASURES

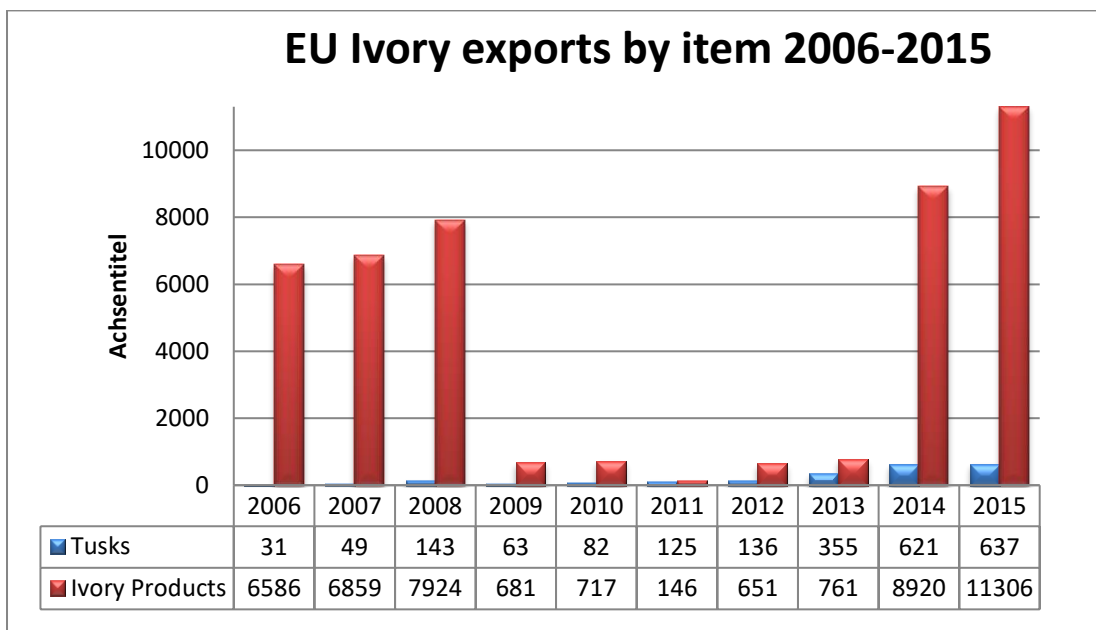
### 1. THE THREAT TO WILD ELEPHANTS

***Elephants are facing the most serious ivory poaching crisis since the international ban on ivory trade was imposed by CITES in 1989.*** The Great Elephant Census (GEC) in 2016 revealed a huge decline in savannah elephants: about 144,000 (or 30%) were lost across 15 African countries between 2007 and 2014. The IUCN African Elephant Specialist Group estimated the total continental elephant population at about 415,000 in 2016. Asian elephants are also poached for their ivory.

Elephant poaching costs human lives, notably those of wildlife rangers, and has been linked to organized crime, armed militias and regional terrorist groups. It results in economic, social and political disruption, and is particularly damaging to local communities and tourism in developing countries.

### 2. CHARACTERISTICS OF THE EU IVORY MARKET

Contrary to the public perception that an international ban on commercial ivory trade exists, significant legal commercial trade in raw and worked ivory continues, including within and from the EU. An analysis<sup>1</sup> of the CITES Trade Database export data for elephant ivory and ivory products for 2006–2015, reveals the EU to be the single largest exporter of ivory items by number of reported transactions. The majority of these exports are reported to be for commercial purposes, and the largest importers are China and Hong Kong, where parallel legal and illegal ivory trades are known to exist. The data also reveal that EU ivory exports have increased sharply in recent years.



<sup>1</sup> See Annex A

The figures reveal a dramatic increase in numbers of both raw and worked ivory items exported from the EU in the last two years for which data are available. **In 2014 and 2015 the EU exported 1258 tusks** – more than the combined total for the previous 8 years. Almost half of worked ivory leaving the EU over the last decade was exported in 2014 and 2015. Record amounts of both raw and worked ivory exported from the EU over the last decade were set in 2014. These records were then surpassed by new export highs recorded in 2015.

In terms of countries to which ivory items were exported by EU Member States, China was the primary recipient with 16,569 (35.8%) ivory items plus 2,376 kg of ivory by weight, followed by the United States with 13,943 ivory items (30.1%) and Switzerland with 2,891 ivory items (6.3%). There were significant discrepancies between reported exports by EU countries, and reported imports by importing countries. Moreover, while the majority (90.4%) of EU ivory export transactions were reported as pre-convention (source code 'O'), the source of 4.2% of exports was reported as "wild" (source code 'W') and of 4.6% as unknown (source code 'U'), raising questions about their legality.

While the total weight of the ivory exported from the EU is not precisely known, the European Commission reported in **February 2016 that between 2003 and 2014 the EU had re-exported 2.8 tonnes of raw ivory and 4.1 tonnes of worked ivory**. Moreover, an additional 3 to 6.5 tonnes of whole tusks – that had not been recorded by weight – are estimated to have been re-exported between 2008 and 2014.<sup>2</sup>

Data from the Hong Kong government confirm the sharp increase in imports of worked ivory pieces from the EU from 1,572 pieces in 2014 to 10,761 pieces in 2015.<sup>3</sup>

Relatively large ivory markets still exist in the UK and Germany, with smaller markets in Belgium, France, Italy, Portugal and Spain.<sup>4</sup> Martin and Stiles reported in 2005 that much of the worked ivory lacks documentation and that there are suspicions that newer ivory may be making its way into the European market. For example East Asian "antique" objects seen in France, Italy and Spain appeared to have been recently crafted and were offered for lower prices than would be expected for true antiques.<sup>5</sup> Moreover, internet sales facilitate the marketing of ivory in the EU and enforcement authorities are facing serious difficulties in enforcing EU regulations.<sup>6,7</sup>

### **3. EVIDENCE FOR EUROPE'S ROLE IN ILLICIT IVORY TRADING**

Recent seizures confirm the increased role of Europe as a transit route and consumer market for poached ivory. Since the end of 2015 an **unprecedented number of large seizures were made in the EU**:

<sup>2</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52016SC0038&from=EN>

<sup>3</sup> see Annex B

<sup>4</sup> Mundy, V. 2014: The Re-export of pre-Convention/antique ivory from the European Union. Report prepared for the European Commission. [http://ec.europa.eu/environment/cites/pdf/Ivory%20report\\_Nov%202014.pdf](http://ec.europa.eu/environment/cites/pdf/Ivory%20report_Nov%202014.pdf)

<sup>5</sup> <http://savetheelephants.org/wp-content/uploads/2014/03/2005MarketsofEurope.pdf>

<sup>6</sup> Interpol 2013. Project Web: An investigation into the ivory trade over the internet within the European Union. <http://www.ifaw.org/sites/default/files/Project%20Web%20-%20PUBLIC.pdf>

<sup>7</sup> IFAW 2012 Killing with keystrokes: IFAW's investigation into the European online ivory trade <http://www.ifaw.org/sites/default/files/FINAL%20Killing%20with%20Keystrokes%202.0%20report%202011.pdf>

- In November 2016 Austria's customs authorities seized a record stockpile of 90 tusks (weighing 563.74 kg). In a search of two apartments after three tusks had been traded in a public street in Vienna. The seller and buyer were both Austrian citizens.<sup>8</sup>
- On 20 May 2016 German authorities made a record seizure of 625 kg of tusks, cut ivory pieces and carvings at Schoenefeld airport in Berlin. This led to a second seizure of 570 kg near Koblenz and the discovery of an illegal ivory workshop, with cutting and grinding machines.<sup>9</sup> Investigations are ongoing, but the German government stated that the seizure seems to involve "old ivory, such as trophies, from all over Europe."<sup>10</sup>
- In May 2016 Spanish authorities seized 744 kg ivory (74 tusks). The seller had reportedly inherited the tusks and attempted to legitimise them using a falsified hunting permit from Mozambique (dating back to 1970) for one elephant.<sup>11</sup>
- In May and June 2016 French authorities seized a total of more than 470 kg of ivory on three different occasions: two at Charles de Gaulle airport, one in a car north of Paris.<sup>12,13</sup>
- In November 2015, 110kg of ivory was seized in Heathrow Airport in London.<sup>14</sup>

**Large ivory seizures are acknowledged to signal involvement of organized criminal networks.** Several cases involve nationals from third countries: for example the large seizures in Germany and France mentioned above and five seizures in 2014 involved Vietnamese nationals living in the Czech Republic.<sup>15</sup>

In 2015, ivory was the second most commonly seized wildlife product in the EU, with 1,043 specimens and 554 kg seized. Significant numbers of parcels containing smuggled ivory were discovered during targeted customs operations in the UK (157 records in 2015 sold via the internet and destined for China) and in Germany.<sup>16</sup> During the period 2009–2014, ivory was the most frequent wildlife product intercepted by the UK Border Force, accounting for over 40% of seizures.<sup>17</sup>

#### **Other recent examples of illegal trade within the EU include:**

- Two UK antique dealers were found guilty of offering illegal ivory on eBay in 2016<sup>18,19</sup> and another in 2014.<sup>20</sup>

<sup>8</sup> [https://english.bmf.gv.at/Largest\\_ivory\\_seizure\\_.html](https://english.bmf.gv.at/Largest_ivory_seizure_.html)

<sup>9</sup> <http://www.reuters.com/article/us-germany-customs-ivory-idUSKCN11F2FX>

<sup>10</sup> Written response by the German Environment ministry to Parliamentary questions, published 21 December 2016 <https://kleineanfragen.de/bundestag/18/10738-elfenbeinhandel-in-deutschland>

<sup>11</sup> [http://spanishnewstoday.com/744-kilos-of-illegal-ivory-seized-in-madrid\\_75536-a.html#action](http://spanishnewstoday.com/744-kilos-of-illegal-ivory-seized-in-madrid_75536-a.html#action)

<sup>12</sup> <http://www.douane.gouv.fr/Portals/0/fichiers/actualites/2016-06/2016-06-08-dossier-de-presse-saisie-de-plus-de-350-kg-d-ivoire-en-ile-de-france.pdf>

<sup>13</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_13.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_13.pdf)

<sup>14</sup> <http://www.bbc.co.uk/news/uk-england-london-34905000>

<sup>15</sup> Mundy, V. 2014: The Re-export of pre-Convention/antique ivory from the European Union. Report prepared for the European Commission. [http://ec.europa.eu/environment/cites/pdf/Ivory%20report\\_Nov%202014.pdf](http://ec.europa.eu/environment/cites/pdf/Ivory%20report_Nov%202014.pdf)

<sup>16</sup> [http://ec.europa.eu/environment/cites/pdf/2015\\_overview\\_important\\_seizures\\_in\\_EU.pdf](http://ec.europa.eu/environment/cites/pdf/2015_overview_important_seizures_in_EU.pdf)

<sup>17</sup> <http://www.wwf.org.uk/updates/nearly-3000-seizures-illegal-wildlife-products-made-uk-border-force>

<sup>18</sup> <http://www.mirror.co.uk/news/uk-news/despicable-ivory-trader-told-think-9215763>

<sup>19</sup> <http://www.express.co.uk/news/nature/710597/Crack-UK-wildlife-crime-unit-smashes-plot-to-sell-ivory-on-eBay>

<sup>20</sup> [http://www.wandsworthguardian.co.uk/news/10962682.Ivory\\_trader\\_fined\\_just\\_\\_\\_1\\_375\\_for\\_selling\\_whale\\_and\\_dolphin\\_bone/](http://www.wandsworthguardian.co.uk/news/10962682.Ivory_trader_fined_just___1_375_for_selling_whale_and_dolphin_bone/)  
Wandsworth Guardian 24 January 2014

- In February 2016 nine ivory objects, including one tusk were seized in a consignment shop in Sicily, Italy.<sup>21</sup>
- In July 2016 members of the criminal group Rathkeale Rovers, which has been involved in the illegal trade in rhino horn in the EU, were arrested on a road near Poitiers, France with 4 tusks “with valid but intriguing certificates.” One of the certificates stated that the owner was a French-Vietnamese director of an export-import company dealing with antiques and cosmetics, based in the Seine Saint Denis geographical department, north of Paris.<sup>22</sup>
- In May 2016, 16 tusks (212 kg) had been seized from the above mentioned export-import company of antiques and various merchandise in Seine Saint Denis, north of Paris. The investigation had started in September 2015 when 4 tusks (43 kg) were uncovered in a car along the route Paris-Poitiers-Bordeaux.<sup>23</sup> In December 2013 another 82 kg of ivory had been seized from a car on the A1 near Poitiers.<sup>24</sup>
- In 2015, as part of Operation Cobra III, 43 ivory objects were seized in the Netherlands.<sup>25</sup>
- In May 2014 French customs seized 208 ivory objects and 1746 pearls in a shop in Saint Denis that were offered without proof of legal acquisition.<sup>26</sup>

#### **Auction houses in the EU have repeatedly been found to offer ivory illegally:**

- UK: In May 2016 Christie’s was fined £3250 for offering a product for sale that contained unworked ivory.<sup>27</sup>
- Scotland: In May 2016 the auction house LS Smellie and Son was sentenced £1500 for acquisition and offer of raw elephant tusks.<sup>28</sup>
- Germany: In 2015, a court ruled about the seizure of a tusk from an auction house in Munich.<sup>29</sup>
- Sweden: In 2014, two cases were investigated where tusks claimed as pre-Convention and observed for sale at auctions were proven by laboratory tests to be more recent than declared.<sup>30</sup>
- UK: In 2014, carved ivory, which had been wrongly dated by its experts as dating from before 1947, was seized from Chiswick Auctions in West London.<sup>31</sup>
- Spain: In March 2013, Spanish authorities seized 111 pieces of ivory from two auction houses. The pieces had been artificially aged in order to conceal their date of origin.<sup>32</sup>

**Evidence of abuse of the EU ivory antique exemption through online auction sites and markets** was presented in a recent BBC documentary. Radiocarbon dating of nine items offered

<sup>21</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_12.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_12.pdf)

<sup>22</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_14.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_14.pdf)

<sup>23</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_13.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_13.pdf)

<sup>24</sup> <http://www.20minutes.fr/societe/1264275-20131216-20131216-poitiers-saisie-82-kg-divoire-delephant-douane>

<sup>25</sup> [http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/578957/IPOL\\_IDA\(2016\)578957\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/578957/IPOL_IDA(2016)578957_EN.pdf)

<sup>26</sup> <http://www.douane.gouv.fr/Portals/0/fichiers/actualites/2016-06/2016-06-08-dossier-de-presse-saisie-de-plus-de-350-kg-d-ivoire-en-ile-de-france.pdf>

<sup>27</sup> <https://www.antiquestradegazette.com/news/2016/christie-s-fined-3250-for-offering-unworked-ivory-trophy/>

<sup>28</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_13.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_13.pdf)

<sup>29</sup> <http://www.sueddeutsche.de/muenchen/auktionshaus-klagt-elfenbein-stooszahn-wird-wohl-eingezogen-1.2535864>

<sup>30</sup> Mundy, V. 2014: The Re-export of pre-Convention/antique ivory from the European Union. Report prepared for the European Commission. [http://ec.europa.eu/environment/cites/pdf/Ivory%20report\\_Nov%202014.pdf](http://ec.europa.eu/environment/cites/pdf/Ivory%20report_Nov%202014.pdf)

<sup>31</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_6.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_6.pdf) page 97

<sup>32</sup> [http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/578962/IPOL\\_IDA\(2016\)578962\\_EN.pdf](http://www.europarl.europa.eu/RegData/etudes/IDAN/2016/578962/IPOL_IDA(2016)578962_EN.pdf)

for sale revealed that four were not antiques at all and two others had been reworked illegally. As many as 500–1000 ivory pieces are estimated to be sold weekly through UK online auctions.<sup>33</sup>

An Interpol report on the ivory trade via internet auction sites in ten EU countries that was carried out in cooperation with Member State authorities in 2013 concluded that “**law enforcement is unable to distinguish legal ivory from illegal ivory in advertisements**” and that “the effective control of advertisements on the Internet has become an almost impossible task.”<sup>34</sup>

A 2016 report by TRAFFIC<sup>35</sup> on the UK ivory trade described lax or poorly understood EU controls with information available on official websites incomplete and in some cases inaccurate. Most ivory items on sale claimed as antique had no documents or proof of their age attached, nor were such documents immediately available on request. **Traders often encouraged ivory purchasers to export products illegally** by post or in hand-baggage without official EU documentation. While no comparable recent reports are available from other Member States, it is quite possible that the situation described by TRAFFIC is similar in other Member States.

According to a report by TRAFFIC to the EU Commission “**fraudulent internal EU trade certificates** have been detected alongside ivory to be smuggled out of the EU:

- In May 2014, for example, 60 kg of ivory was detected by German authorities in the baggage of two Vietnamese citizens travelling from the Czech Republic to Vietnam via Germany.
- A falsified Belgian internal trade certificate accompanied the ivory, on which both the weight and the length of the tusk had been modified. Similar cases have been reported...<sup>36</sup>.
- In April 2016 police in Germany seized at least seven tusks from a rented car that were accompanied by forged permits.<sup>37</sup>

Moreover, some **EU companies** (e.g. in Germany and the Netherlands, with subsidiary companies in other Member States) specialize in purchasing ivory from across Europe and then re-exporting it to Asia. Reportedly, a company based in Germany has used internal EU trade certificates as a basis for re-export applications (e.g. from Germany and Bulgaria). CITES authorities in several instances rejected such applications because of lack of proof of legal acquisition.<sup>38</sup>

**Large ivory stockpiles are known to exist in several EU Member States.** The UK alone is estimated to have imported tusks from more than 1 million elephants during the colonial era.<sup>39</sup> Several other EU countries including Belgium, France, Portugal, Spain and Germany also imported large quantities of ivory from African colonies. According to a written response by the German government to questions posed by Members of Parliament the amount of ivory in the possession of the commercial ivory carving industry in the Odenwald region was reduced significantly from

<sup>33</sup> <http://www.bbc.co.uk/programmes/b0813xr2>

<sup>34</sup> Interpol 2013: An Investigation into the ivory trade over the internet within the European Union <http://www.ifaw.org/sites/default/files/Project%20Web%20-%20PUBLIC.pdf>

<sup>35</sup> TRAFFIC 2016: [http://www.trafficj.org/publication/16\\_A\\_Rapid\\_Survey\\_of\\_UK\\_Ivory\\_Markets.pdf](http://www.trafficj.org/publication/16_A_Rapid_Survey_of_UK_Ivory_Markets.pdf)

<sup>36</sup> Mundy, V. 2014: The Re-export of pre-Convention/antique ivory from the European Union. Report prepared for the European Commission. [http://ec.europa.eu/environment/cites/pdf/Ivory%20report\\_Nov%202014.pdf](http://ec.europa.eu/environment/cites/pdf/Ivory%20report_Nov%202014.pdf)

<sup>37</sup> <http://www.br.de/nachrichten/unterfranken/inhalt/elfenbeinfund-a3-wuerzburg-102.html>

<sup>38</sup> Mundy, V. 2014: The Re-export of pre-Convention/antique ivory from the European Union. Report prepared for the European Commission. [http://ec.europa.eu/environment/cites/pdf/Ivory%20report\\_Nov%202014.pdf](http://ec.europa.eu/environment/cites/pdf/Ivory%20report_Nov%202014.pdf)

<sup>39</sup> Milliken, T, (Traffic) 2016, quoted in <http://www.express.co.uk/news/nature/705713/Elephant-slaughter-shock-report-shows-thousands-ivory-products-sale-Britain>



13.5 tonnes (more than 1,000 tusks) registered in 2007 to 2.3 in 2014.<sup>40</sup> However, no public information is available on what happened to this ivory.

**Two dossiers, compiled** by Robin des Bois in their regular publication “On The Trail” summarising over 60 cases of illegal ivory trade in the last three years involving the EU, are included as Annex C.<sup>41</sup>

#### **4. LEGAL IVORY FUELS ILLEGAL TRADE AND CONSUMER DEMAND IN A GLOBAL MARKET**

Ivory exports from the EU constitute one of several legal and illegal sources of ivory feeding a global market for ivory, particularly in key destinations for ivory in Asia. Regional, national and local markets are inextricable components of this indivisible global market. As documented above, legal exports of raw and worked 'pre-Convention' ivory items from the EU have risen substantially in recent years. China and Hong Kong are the largest importers of this “legal” EU ivory. Asian markets play a key role in transnational illegal ivory trade. China is the world’s largest destination market for illegal ivory<sup>42</sup>.

A wealth of evidence is now available that unquestionably shows that the domestic legal ivory market in China is perpetuating illegal trade in ivory.<sup>43</sup> For example in 2013, the owner of a licensed ivory carving factory was convicted for smuggling a total of 7.7 tonnes of ivory from Africa to China.<sup>44</sup> Hong Kong is the city with the world’s largest legal ivory retail market with an ivory licensing system which is fraught with significant loopholes enabling ivory trafficking.<sup>45</sup> Recent investigations have also documented how Japan’s legal domestic ivory trade control system is plagued by loopholes and undercut by weak legislation. No meaningful control exists at even the most basic level.<sup>46</sup> Indeed, EU ivory markets have been accused of fuelling illegal trade in mainland China<sup>47</sup> and Hong Kong.<sup>48</sup>

A recent BBC documentary<sup>49</sup> showed ivory legally exported from the EU ends up in the hands of the same traders in Hong Kong who were also buying and selling recently poached ivory.<sup>50</sup> There

<sup>40</sup> Written response by the German Environment ministry to Parliamentary questions, published 21 December 2016 <https://kleineanfragen.de/bundestag/18/10738-elfenbeinhandel-in-deutschland>

<sup>41</sup> See Appendices 2 and 3 attached. Full English version of the cases available at <http://www.robindesbois.org/en/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande>. Original in French <http://www.robindesbois.org/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande/>

<sup>42</sup> See, e.g., UNEP et al. (2013), Elephants in the Dust – The African Elephant Crisis. A Rapid Response Assessment at 40, 67

<sup>43</sup> See, e.g., EIA (Nov. 2014), Vanishing Point - Criminality, Corruption and the Devastation of Tanzania’s Elephants, <http://eia-international.org/vanishing-point-criminality-corruption-and-the-devastation-of-tanzanias-elephants>; EIA (March 2012), Blood Ivory: Exposing the Myth of a Regulated Market, <http://eia-international.org/bloodivory-exposing-the-myth-of-a-regulated-market>; Elephant Action League (2015), Blending Ivory: China’s old loopholes, new hopes

<sup>44</sup> EIA 2014: In Cold Blood: Combating organised wildlife crime, <http://eia-international.org/in-coldblood-combating-organised-wildlife-crime>.

<sup>45</sup> WWF-Hong Kong 2015: The Hard Truth: How Hong Kong’s Ivory Trade is Fuelling Africa’s Elephant Poaching Crisis; WildAid (2015), The Illusion of Control: Hong Kong’s ‘Legal’ Ivory Trade; Elephant Action League (2015), Blending Ivory: China’s old loopholes, new hopes.

<sup>46</sup> EIA 2015: Japan’s Illegal Ivory Trade and Fraudulent Registration of Ivory Tusks, <http://eia-global.org/news-media/fraudulent-tusk-registration-fuels-ivory-trade-in-japan>.

<sup>47</sup> [http://news.xinhuanet.com/2015-03/27/c\\_1114787367.htm](http://news.xinhuanet.com/2015-03/27/c_1114787367.htm)

<sup>48</sup>

<https://www.hk01.com/%E5%9C%8B%E9%9A%9B/21141/%E9%A6%99%E6%B8%AF%E6%98%AF%E8%B1%A1%E7%89%99%E6%9C%80%E5%A4%A7%E4%B8%AD%E8%BD%89%E7%AB%99-%E6%8F%AD%E7%A7%98%E5%90%88%E6%B3%95%E5%A4%96%E8%A1%A3%E4%B8%8B%E7%9A%84%E8%A1%80%E8%89%B2%E8%B5%B0%E7%A7%81%E9%8F%88>

<sup>49</sup> <http://www.bbc.co.uk/programmes/b0813xr2>

<sup>50</sup> As investigations of trade outlets have shown (eg in Hong Kong) legal and illegal traders are mutually supportive. The key challenge for ivory smugglers is to sell. A major option is to establish and cultivate contacts with legal traders because they provide transport



have also been seizures of ivory in Asia exported from the EU. For example, in October 2015, Shijiangzhuang Customs Anti-Smuggling Bureau in China seized six ivory carvings from a mail parcel sent from France.<sup>51</sup> In August 2014, Fuzhou Customs in China seized 37 ivory products mailed or transported in person from the UK to China,<sup>52</sup> thereby cracking a UK-based criminal syndicate involved in ivory smuggling.<sup>53</sup> Vietnam has over the last three years, repeatedly seized ivory that was exported from France (see Annex C). In July 2016 eight parcels containing raw ivory were seized in Vietnam that had been exported from the Czech Republic.<sup>54</sup>

A recent TRAFFIC report notes that according to traders, **the principal buyers of ivory antiques in the UK 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.<sup>55</sup> This directly links the ivory market in the EU with consumers from Asian countries, and undermines the impact of demand-reduction campaigns in such markets. By failing to prohibit ivory exports from the EU, the EU also stands to undermine China's recent decision to close its domestic ivory market by end of 2017.

## **5. GAPS AND WEAKNESSES IN EXISTING AND PLANNED EU IVORY CONTROLS**

The EU is the only section of the global ivory market that is controlled regionally and relies heavily on import and export controls at EU external borders. Those countries with the weakest external border controls will inevitably be targeted by those wishing to evade import controls, or re-export ivory. The absence of border controls between the EU's 28 Member States means ivory, including illegal ivory, can easily be moved within the entire region without adequate enforcement or inspection measures.

### **Loopholes resulting from exemptions for pre-1947 and pre-Convention specimens**

The EU's attempts to control internal ivory commerce are seriously hampered by the fact that no certificates are required to move ivory within the EU, or to buy and sell ivory if it is claimed to be "antique" (i.e. a pre-1947 worked item). Reports on the internet trade, the recent carbon dating of alleged "antique" items by the BBC, and convictions of antiques dealers and auction houses (see above) clearly show that this loophole is exploited by unscrupulous traders.

The wide exemption permitting trade in "antique" ivory without certificates is contained only in the implementing regulation (Commission Regulation 865/2006), which was laid down by the Commission under the Committee procedure – it is not included in the Council regulation and was never specifically sanctioned by the Council or Parliament. It is inconsistent with the minimum standard set by CITES which requires pre-Convention specimens to have an (individual) certificate issued by a Management Authority (Article VII.2).

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channels and storage facilities, as well as communications with potential customers and access to CITES permits. Laundering in this way allows the legal trade to solve all the logistic, bureaucratic and financial problems faced by the smugglers. As long as there is a domestic market open somewhere, the illegal trader or poacher will hope to supply the raw material or the finished product. This is something we can extrapolate from our knowledge of business history. On the other side, the interest of the legal traders is also served by their role in laundering ivory. They have a sunken investment (eg a shop, licenses, craftsmen and their tools) but they face restrictions on the supply of the raw material. Laundering is a favourable option to continue in business and prop up profitability.

<sup>51</sup> <http://www.customs.gov.cn/publish/portal171/tab63131/info761382.htm>

<sup>52</sup> [http://news.xinhuanet.com/english/china/2014-11/28/c\\_133820933.htm](http://news.xinhuanet.com/english/china/2014-11/28/c_133820933.htm)

<sup>53</sup> <http://www.davidshepherd.org/news-events/news/uk-based-smuggling-racket-cracked-in-china/>

<sup>54</sup> [http://www.robindesbois.org/wp-content/uploads/ON\\_THE\\_TRAIL\\_14.pdf](http://www.robindesbois.org/wp-content/uploads/ON_THE_TRAIL_14.pdf)

<sup>55</sup> TRAFFIC 2016: [http://www.trafficj.org/publication/16\\_A\\_Rapid\\_Survey\\_of\\_UK\\_Ivory\\_Markets.pdf](http://www.trafficj.org/publication/16_A_Rapid_Survey_of_UK_Ivory_Markets.pdf)

Also, the EU Regulation allows Member States to issue pre-Convention certificates for ivory claimed to have been acquired before 1990, in contradiction to CITES Resolution Conf. 13.6 (Rev. CoP16) which only accepts the validity of such certificates for ivory dated from before 1976 when African elephants were first listed on the CITES Appendices.

In addition, there is no uniform date across the EU for pre-Convention ivory. Provisions in the EU Regulation to reflect the different dates when Member States joined CITES further weaken elephant protection, by confusing EU rules on ivory trade and their enforcement across all Member States.

Although CITES Resolution 10.10 (Rev. CoP17) has for many years been calling for a number of strict measures to strictly regulate legal ivory markets, **the EU does not require that ivory importers, exporters, traders and manufacturers are registered or licensed and that ivory stockpiles are inventoried.** Nor does it have specific recording, inspection and enforcement procedures to monitor the movement of ivory. Instead enforcement efforts and evidence required for proof of legal acquisition vary significantly between Member States.

**Finally, it is extremely difficult – and often even impossible – to distinguish legal from illegal ivory.** Documentary evidence is often lacking or not verifiable. Radiocarbon dating, though costly and time-consuming, can help determine whether an elephant lived before the start of nuclear bomb testing in the early 1950s – but it cannot establish the date when the animal was killed or whether the ivory derived indeed qualifies under the “antiques” or “pre-Convention” exemption.

### **The EU lacks a consistent, mandatory and permanent ban on all ivory re-exports**

Inconsistent policies among EU Member States combined with freedom to move ivory internally within the EU inevitably encourages traders to focus on Member States which continue to issue export permits for ivory. An EU-wide recommendation in the form of guidance to suspend the issuing of permits for the re-export of raw ivory would not be binding and would provide no legal security. Moreover, ending re-exports of raw ivory only, when exports of worked ivory form a large and increasing share of the trade, would represent an inconsistent, piecemeal approach and would not be in accordance with the precautionary principle.

## **6. VIEWS OF EUROPEAN PARLIAMENT, MEMBER STATES AND THE PUBLIC**

Two resolutions were passed by the European Parliament (EP) in recent months, repeating calls for the closure of domestic ivory markets and an end to EU participation in the international ivory trade first made in 2014 when the scale and impact of recent ivory poaching and smuggling was becoming clear.

The first resolution<sup>56</sup> passed on 15 September 2016 concerning EU strategic objectives for the upcoming 17th CITES CoP in South Africa *“Recalls the call made in its resolution of 15 January 2014 on wildlife crime on all 28 of its Member States to introduce moratoria on all commercial imports, exports and domestic sales and purchases of tusks and raw and worked ivory products until wild elephant populations are no longer threatened by poaching;”*.

<sup>56</sup> 2016/2664(RSP) [http://parltrack.euwiki.org/dossier/2016/2664\(RSP\)](http://parltrack.euwiki.org/dossier/2016/2664(RSP))

The second EP resolution concerning the EU Action Plan against wildlife trafficking was passed in October 2016, and called for “*a full and immediate ban at EU level on trade, export or re-export of ivory and rhinoceros horns.*”

An opinion poll carried out by TNS in September 2016 in the UK suggested that 85% of respondents supported a complete ban on all trade in ivory. Only 8% of the persons surveyed were aware that buying and selling ivory is still legal.

A petition to the EU institutions for the closure of the European ivory trade has gathered more than 263,000 signatures since December 2016.<sup>57</sup>

France has already taken measures restricting its own ivory trade. The Netherlands has indicated it is considering domestic measures as well. In the UK, a Parliamentary petition calling on the government to adhere to its 2010 and 2015 manifesto commitments and shut down domestic ivory trade had over 95,000 signatures as of mid-January 2016.<sup>58</sup> The UK government has announced that it will issue a public consultation document on stricter measures against the ivory trade as an initial step towards fulfilling its manifesto commitments to end ivory trade. In a Parliamentary debate in the UK on 8 December 2016, almost all the MPs who spoke supported closure of ivory markets.

## **7. RECENT INTERNATIONAL COMMITMENTS AND DEVELOPMENTS AFFECTING THE IVORY TRADE**

In September 2016 at the **International Union for the Conservation of Nature’s World Conservation Congress** a Resolution was passed calling for the unconditional closure of domestic markets for elephant ivory.<sup>59</sup> This was supported by EU states present at the Congress.

A **CITES Resolution**<sup>60</sup> passed unanimously in October 2016 at the 17th meeting of the Conference of the Parties recommended that Parties, whose markets contribute to illegal trade or poaching, should “*take all necessary legislative, regulatory and enforcement measures to close their domestic markets for commercial trade in raw and worked ivory as a matter of urgency.*” The condition added to the resolution about markets contributing to poaching or illegal trade is manifestly met in the case of the EU, given the fact that illegal ivory is sold in the EU and transiting through it, the indivisibility of the ivory market, the intermingling of ivory legally exported from the EU with poached ivory in consumer markets, and the contribution that exports of EU ivory make to maintaining consumer markets in Asia which pose a dangerous threat to elephants.

Another resolution passed at CoP17<sup>61</sup> urges all Parties to implement well-targeted, species-specific, evidence-based **demand reduction campaigns** for endangered wildlife and to: “*enhance policy, legislation and law enforcement in this regard.*” Parties are also required to engage key consumer groups and target “*the motivations for the demand*”, including the “*speculative nature of the demand*”. The continued trade in ivory products from the EU conflicts with the demand reduction campaigns called for by CITES and many other agreements.

The EU is a signatory to the **London Declaration** on Illegal Wildlife Trade which includes among its actions “*eradicating demand and supply*” and “*prohibiting commercial international trade in*

<sup>57</sup> <https://www.rainforest-rescue.org/petitions/1076/tell-the-eu-to-ban-the-ivory-trade-now>

<sup>58</sup> <https://petition.parliament.uk/petitions/165905>

<sup>59</sup> <https://portals.iucn.org/congress/motion/007>

<sup>60</sup> <https://cites.org/sites/default/files/document/E-Res-10-10-R17.pdf>

<sup>61</sup> <https://cites.org/sites/default/files/document/E-Res-17-04.pdf>

*elephant ivory until the CITES Conference of the Parties determines, informed by scientific analysis, that the survival of elephants in the wild is no longer threatened by poaching.*<sup>62</sup> This declaration has subsequently been reinforced by other declarations, to which the EU is also a signatory.

The US has tightened up regulations at the federal level to institute a near-total ban on ivory sales and several of the country's largest ivory markets including New York, Hawaii and California, have implemented even stronger bans on ivory sales. Hong Kong, the single largest ivory trading centre, has announced its intention to phase-out its ivory commerce over a 5 year period through a three-phase process.<sup>63</sup> Following a crucial bilateral agreement between the US and China in 2015, China has already banned most commercial imports of ivory and announced on 30 December 2016 that it will close its commercial processing and trade in ivory by end of 2017.

The EU now needs to ensure that its own regulations complement these important developments in Asia and America. **Inaction or weak measures by the EU risk delaying or preventing action by important consumer countries.**

## **8. CONCLUSION & RECOMMENDATIONS**

The EU is obliged to act according to the **Precautionary Principle**. Article 191(2) of the Treaty on the Functioning of the EU provides that EU environmental policy is to be based on the precautionary principle. Pursuant to that principle, *“if an action or policy has a suspected risk of causing harm to the public or to the environment, in the absence of scientific consensus that the action or policy is harmful, the burden of proof that it is not harmful falls on those taking the action.”* This is also a fundamental principle of CITES and EU Council Regulation 338/97.

With the closure of several global significant ivory markets outlined above, there is a strong risk that by maintaining a legal, commercial ivory trade the EU will stoke global demand for the product and provide a cover by which ivory poached from diminishing elephant populations can be laundered into trade. The precautionary principle clearly requires that the domestic ivory trade as well as all exports are banned.

Based on data on ivory seizures and incidents of illegal ivory sales in the EU, it is clear that the EU is implicated in the illegal trade in ivory and helps fuel transnational wildlife crime. While the EU has invested hundreds of millions dollars in range states' anti-poaching and enforcement efforts, the EU can no longer ignore the call for closure of domestic ivory markets by range states battling the elephant poaching crisis and must act to support the announcements by China and Hong Kong to close their domestic ivory markets. There has been a significant increase in raw and worked ivory exports from the EU to Asian markets and it is time that the EU urgently puts an end to all ivory exports and closes domestic ivory markets in the EU.

Given the **active market** and **large stockpiles of ivory** remaining in some Member States, the EU has a vital role to play in implementing recent IUCN and CITES decisions aimed at closing domestic markets swiftly and effectively, and in strengthening its own legislation, public education and enforcement efforts. Efforts to reduce demand in major consuming countries and to improve

<sup>62</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/281289/london-wildlife-conference-declaration-140213.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281289/london-wildlife-conference-declaration-140213.pdf)

<sup>63</sup> <https://www.hongkongfp.com/2016/12/21/hong-kongs-ivory-trade-to-be-gradually-banned-by-the-end-of-2021/>  
<https://www.hongkongfp.com/2016/12/21/hong-kongs-ivory-trade-to-be-gradually-banned-by-the-end-of-2021/>

anti-poaching initiatives in range states, will continue to be undermined and rendered ineffective as long as the EU's ivory market persists.

It is understood that the Commission is proposing guidance to Member States in line with the EU Action Plan against Wildlife Trafficking published earlier this year. This would include an "aim" to suspend exports of only raw pre-Convention ivory by ensuring Member States do not issue permits and to guarantee that only legal ancient ivory items are traded in the EU.

**Stronger measures than mere guidelines are necessary** to stop the ivory trade and the use of the EU as a transit point and destination for illegal ivory and as a source of ivory and ivory products which fuel demand in consumer countries.

**We recommend that such measures include the following steps implemented in two stages:**

### **Stage 1**

**We support the swift use of Commission guidance, but only as a first step and on condition that these are followed by changes to the mandatory framework for ivory under the EU Regulations.**

**We advocate that the guidance include a recommendation not to issue permits for (re-) export of raw and worked ivory**, as both have been found in illegal trade and fuel demand. Also, a full export ban would be consistent with the ban on imports implemented by China as the main consumer country, as well as with measures to tighten rules in other CITES Parties. It will also support campaigns to reduce demand for ivory in China and other markets, including demand-reduction initiatives funded by the EU. We believe swift guidance to this effect issued as early as possible in 2017 would demonstrate the EU's commitment to the growing international consensus that the ivory trade must be brought to an end in the interest of elephants, and in the interest of addressing the loss of human lives, economic opportunities, and fighting organized crime.

We would also recommend that, as a positive step in reducing demand for ivory in accordance with the EU Action Plan and the CoP17 resolution, the guidance should encourage Member States to routinely destroy stockpiles of seized ivory, and seek voluntary engagement of the public in disposing of privately held ivory.

### **Stage 2**

**The EU should introduce a mandatory, comprehensive, permanent ban on all external commercial trade in ivory (imports, exports and re-exports) and a prohibition on commercial intra-EU trade in ivory.**

We believe that measures to achieve a total ban should be possible through a combination of further guidelines (on withholding intra-EU permits) and through the amendment of the EU Wildlife trade regulations. Exemptions for commercial trade should be limited to bona fide antique items containing a small proportion and quantity of ivory, e.g. inlaid furniture or musical instruments - and all such trade should require permits. This would be similar to the approach taken in the US.

## **DESCRIPTIVE ANALYSIS OF IVORY EXPORTS FROM THE EUROPEAN UNION 2006 to 2015**

**Mark Jones, Born Free Foundation  
December 2016**

### Summary

An analysis of CITES Trade Database<sup>1</sup> export data for elephant ivory and ivory products from European Union Member States for the period 2006-2015 inclusive, revealed the EU to be the largest international exporter of ivory items<sup>2</sup> by number of reported export transactions. EU Member States collectively reported 1,874 ivory export transactions<sup>3</sup> (28.3% of the total), compared to 832 (12.6%) by the United States and 761 (11.5%) by South Africa, the two next largest exporters. Individual EU Member States comprised 4<sup>4</sup> of the top 10 ivory exporters by number of reported export transactions.

During the 10 year period, EU Member States reported exports of 2,242 tusks and 44,551 ivory products<sup>5</sup>; in addition, exports of 492kg of tusks and 4,652kg of ivory products were reported by weight. The figures reveal a dramatic increase in numbers of both raw and worked ivory items exported from the European Union in the last two years for which data are available. In 2014-15 the EU exported 1258 tusks – more than the combined total for the previous 8 years. Almost half of worked ivory leaving the EU over the last decade was exported in 2014-15. Record figures for the export of both raw and worked ivory from EU over the last decade were set in 2014 – and the records were then both surpassed by new export highs recorded in 2015.

A total of 25 of the current 28 EU Member States reported some quantity of ivory exports for the 10 year period; only Croatia, Luxembourg and Malta reported no exports. The United Kingdom reported exports of 25,352 ivory items, by far the greatest number (54%) of any Member State, followed by Italy (8,913; 19%) , France (3,336; 7%) and Germany (3,123; 6.5%).

The majority (90.4%) of EU ivory export transactions were reported as pre-convention (source code 'O'), with 4.6% reported as unknown (source code 'U') and 4.2% as wild sourced (source code 'W'). In terms of purpose, 60% of transactions were reported to be commercial (purpose code 'T'), with 24.3% personal (purpose code 'P'), and 10.8% circus/travelling exhibition (purpose code 'Q').

In terms of countries to which ivory items were reported to have been exported by EU Member States, China was the most significant with 16,569 (35.8%) ivory items plus 2,376kg of ivory by weight, followed by the US with 13,943 ivory items (30.1%) and Switzerland with 2,891 ivory items (6.3%). There were significant discrepancies between reported exports by EU countries, and reported imports from the EU by importing countries; for example EU countries reported exports of 957 tusks and 116 ivory products to Hong Kong; Hong Kong reported imports from EU countries of 750 tusks and 5,760 ivory products.

### Methodology

A search was conducted in December 2016 of the CITES Trade Database for the period 2006-2015 using the trade terms 'tusks', 'jewellery-ivory', 'ivory carvings', 'ivory pieces', 'ivory sets' and 'ivory scraps', and the data downloaded in comma-separated output as comparative tabulations.

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<sup>1</sup> CITES trade statistics derived from the CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK

<sup>2</sup> Defined as items derived from *Elephantidae* spp., *Elephas maximus*, or *Loxodonta Africana* described as 'tusks', 'jewellery – ivory', 'ivory carvings', 'ivory pieces', 'ivory sets' or 'ivory scraps'

<sup>3</sup> Defined as an export transaction ivory items where the exporting country reports a quantity

<sup>4</sup> UK, Italy, France and Germany

<sup>5</sup> 'Ivory products' include ivory items declared on the WCMC-CITES trade database as 'jewellery – Ivory', 'ivory carvings', 'ivory pieces', 'ivory sets' or 'ivory scraps'. By weight exports over the decade were reported as 492kg tusks and 4652 kg of ivory products.

The resulting dataset was filtered for the taxa '*Elephantidae* spp.', *Elephas maximus*, and *Loxodonta africana*; data relating to other listed taxa were discarded.

For the purpose of analysing ivory export transactions, only transactions where an Exporter Reported Quantity had been entered were considered. Some analysis of Exporter Reported Quantity and Importer Reported Quantity was also carried out for the purpose of comparison.

### Definitions

- An 'Ivory transaction' is defined as any single transaction in which an Exporter Reported Quantity of an ivory item is declared;
- 'Ivory items' are defined as all items (tusks and 'ivory products') declared by number;
- 'Ivory products' are defined as those items described in the database as 'jewellery-ivory', 'ivory carvings', 'ivory pieces', 'ivory sets' and 'ivory scraps';
- Ivory items declared by weight are considered separately; ivory items declared by volume were excluded from the analysis.

### Results

Detailed results of data analyses are given in the tables below:

**Table 1: Top 5 Ivory Export Transactions declared by country/region 2006-2015**

Exporter	Export transactions
EU (European Union)	1874
US (United States)	832
ZA (South Africa)	761
CA (Canada)	583
ZW (Zimbabwe)	530

**Table 2: EU Ivory exports declared by item 2006-2015**

		2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Total
Tusks												
	<i>Elephantidae</i> spp.	2	8	2	3	3	2	11	9	34	37	111
	<i>Elephas maximus</i>	2	0	0	4	2	6	5	8	16	0	43
	<i>Loxodonta africana</i>	27	41	141	56	77	117	120	338	571	600	2088
	Total	31	49	143	63	82	125	136	355	621	637	2242
Ivory products												
	<i>Elephantidae</i> spp.	410	2234	624	180	178	17	189	281	2014	674	6801
	<i>Elephas maximus</i>	1103	585	645	120	134	2	3	5	728	761	4086
	<i>Loxodonta africana</i>	5073	4040	6655	381	405	127	459	475	6178	9871	33664
	Total	6586	6859	7924	681	717	146	651	761	8920	11306	44551



**Table 3: EU ivory exports declared by weight 2006-20015**

	Tusks (kg)	Ivory products (kg)
Elephantidae spp.	68	1830.54
Elephas maximus	2	2.628
Loxodonta africana	421.65	2818.988
Total	491.65	4652.156

**Table 4: Ivory item exports by EU Member States 2006-2015, ranked in descending order**

Exports by Member State		Tusks	Ivory products	Total
United Kingdom	GB	50	25302	25352
Italy	IT	25	8888	8913
France	FR	691	2645	3336
Germany	DE	149	2974	3123
Denmark	DK	34	1355	1389
Austria	AT	247	911	1158
Poland	PL	17	1059	1076
Portugal	PT	92	488	580
Netherlands	NL	268	262	530
Belgium	BE	271	204	475
Spain	ES	186	172	358
Ireland	IE	79	29	108
Czech Republic	CZ	0	94	94
Cyprus	CY	0	80	80
Romania	RO	25	52	77
Hungary	HU	36	10	46
Greece	GR	23	3	26
Slovenia	SI	26	0	26
Sweden	SE	3	16	19
Estonia	EE	17	0	17
Finland	FI	0	3	3
Lithuania	LT	3	0	3
Slovakia	SK	0	2	2
Bulgaria	BG	0	1	1
Latvia	LV	0	1	1
Croatia	HR	0	0	0
Luxembourg	LU	0	0	0
Malta	MT	0	0	0

**Table 5: Comparison of Exporter and Importer reported quantities of ivory items declared to have been exported from EU Member States to the top 5 international destinations 2006-2015**

Importer	Tusks by number		Ivory products by number		Tusks by weight (kg)		Ivory products by weight (kg)	
	EU Exporter reported	Importer reported	EU Exporter reported	Importer reported	EU Exporter reported	Importer reported	EU Exporter reported	Importer reported
HK (Hong Kong)	957	750	116	5760	100.8	4297.737	768.571	1538.35
CN (China)	895	21	15674	605	329.75	0	2046.345	9
US (United States)	61	56	13882	25347	31.3	0	28.19	8.7
CH (Switzerland)	42	54	2849	4767	0	4	215.774	0.131
CA (Canada)	41	20	926	1812	0	0	4.98	13.1

**Table 6: EU ivory export transactions by source and purpose code**

Source code	Description			
		Tusks	Ivory products	Total
C	Captive bred	2	2	4
I	Confiscated/seized	3	5	8
O	Pre-convention	394	1301	1695
U	Unknown	4	83	87
W	Wild sourced	45	33	78
Purpose code	Description			
		Tusks	Ivory products	Total
E	Educational	8	71	79
H	Hunting trophy	7		7
P	Personal	120	336	456
Q	Circus/travelling exhibition	5	198	203
S	Scientific	1	2	3
T	Commercial	305	817	1122
Z	Zoo	2		2

The quantity of pre-Convention ivory imported into Hong Kong in 2014 and 2015 with breakdown by country is tabulated below.

Country	2014		2015	
	kilogram	piece	kilogram	piece
Austria	12.84	51		
Belgium	317	1	1439.198	218
Canada		26		1
Czech Republic				1
Denmark		2		
France	3077.957	136	838.64	170
Germany	27.18	13		1
Hungary		2		
Italy	13.09	74	211	7639
Lithuania			16.7	
Japan		20		
Macau		4		
Monaco			38.5	
The Netherlands	595.48	93		40
New Zealand	0.7			
Portugal		4	85.9	64
Russian Federation		6		
Singapore				5
Slovenia	5.93		73.9	17
South Africa				52
Spain	25.7	55	535.5	87
Sweden	27.9			
Switzerland		16	29	19
UK		1141		2524
USA		1		66
<b>TOTAL</b>	<b>4103.777</b>	<b>1645</b>	<b>3268.338</b>	<b>10904</b>

Source: Hong Kong Government Agriculture, Fisheries and Conservation Department (AFCD).

## IVORY TRAFFICKING IN EUROPE

Some examples from « On the Trail »,  
Robin des Bois' quarterly information and analysis bulletin on animal poaching and smuggling

Full English version available at

<http://www.robindesbois.org/en/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande/>

Original in French

<http://www.robindesbois.org/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande/>

These tusks and carved ivory items seized in the European Union are illegal whenever the poaching and/or the initial contraband from elephant range States occurred. They are evidence that the European market contributes "to poaching or illegal trade" according to the terms of CITES Resolution Conf.10.10 revCoP17.

Cases where the European Union was clearly the transit route have been excluded from this selection (i.e. in May 2015, seizure at Paris-Charles-de-Gaulle airport in France of 12 tusks coming from the Republic Democratic of the Congo and heading to Vietnam, transit through Paris).

### FRANCE

« On the Trail » n°2 p. 66

#### **Seizure of 33 pieces of ivory and ivory tusks Avignon, Region of Provence-Alpes-Côte d'Azur, France 18th September 2013**

Flea markets and car boot sales can be an opportunity for the curious to find objects whose origin is suspicious. Avignon International is seen as a «must» in the South of France for professional antique dealers and antique lovers. «Dozens of international freight forwarders deal with the removal of the antiques, packaging and customs formalities». The customs officers in the department of Vaucluse went straight to the source. The sellers of non-certified and seized ivory are liable to heavy fines.

« On the Trail » n°3 p. 68

#### **Seizure of 82 kg of ivory**

#### **Poitiers, Poitou-Charentes Region, France December 10, 2013**

2 tusks and pieces of tusks worth € 80,000 were seized from the trunk of a car on the A10 highway in the centre of France. The discovery happened thanks to a routine customs road check on a rest area. The driver presented a forged certificate for the 2 tusks and had no justification for the pieces. 2 rings and precious stones were found with the ivory valued at € 10,500 for the entire load.

« On the Trail » n°3 p. 76

#### **Seizure of 2 elephant tusks and carved ivory**

#### **Avignon, Region of Provence-Alpes-Côte d'Azur, France**

#### **Decembre 9, 2013**

Bis repetita (see « On the Trail » n°2). The objects were seized at an international rummage sale taking place at the exposition center in the city of Avignon. The people selling the good with no certificates received a fine from custom services.

« On the Trail » n°4 p. 89

#### **Seizure of 3 tusks and 23 manufactured ivory objects**

#### **Departments of Var and Alpes-Maritimes Region Provence-Alpes-Azur Coast and the department of Herault, Languedoc-Roussillon, France February 11, 2014**

Salesroom are often the host of lost or robbed ivory. The Office national de la chasse et de la faune sauvage (ONCFS) has spotted in the salesroom of Cannes tusks and ivory objects presented to be of "Belgian Congo" origin, therefore prior to regulation on international trade. Investigations resulted in arrest of 3 men of the "travelling community" and the seizure of 3 tusks and 23 carved ivory objects including a dildo.

« On the Trail » n°4 p. 104

**Seizure of 3 carved ivory tusks**

**Avignon, Region of Provence-Alpes-Côte d'Azur, France**

**February 10, 2014**

The Avignon festival is in full swing. The so-called "professional market" always comes through with great surprises and presents choice pieces to the marveled eyes of the custom officers assiduous to these regular events that attract the scam professionals of the entire world.

« On the Trail » n°5 p. 103

**Seizure of 280 carved ivory**

**Var Department, Region of Provence-Alpes-Côte d'Azur, France**

**May 2014**

Kamasoutra positions, necklaces, statuettes, decorated tusks, bracelets. The 6 hour long search was maybe not enough. There might be still more hidden somewhere. The 70 years old couple spent their time and money buying ivory on the Internet, in garage and antiquity sales and the opaque networks seldom known but by the insiders.

« On the Trail » n°5 p. 126

**Seizure of a worked ivory tusk**

**Avignon, Provence-Alpes-Côte d'Azur, France**

**7 April 2014**

Like many times a year, the customs of Avignon went to the international second hand fair at exhibitions center in Châteaublanc. As usual they didn't leave empty handed. The violators had to pay a customs' fine.

« On the Trail » n°7 p. 116

**Seizure of 3 ivory statuettes**

**Avignon, Region of Provence-Alpes-Côte d'Azur, France**

**November 26, 2014**

" Still life " composed by the custom officers in Avignon after their visit to an international second hand sale. Most of the things seized come from the Eastern countries. Fines were given out and paid. All the items will be destroyed in an industrial burning site.

« On the Trail » n°8 p. 89

**Seizure of a carved tusk and a pair of elephant feet**

**Lorient, Brittany Region, France**

**February 9, 2015**

Is Brittany an ivory storehouse? It may be - many sailors, travelers, explorers, and adventurers were born there, left, and keep coming back. Among 200 packages of "personal belongings", at the bottom of a shipping container, Lorient customs officers seized carved ivory and stools whose seats were made of some kind of animal skin. The container used for the move came from South Africa. It came to France via Le Havre port.

« On the Trail » n°8 p. 104

**Seizure of an elephant tusk and of an ivory piece**

**Avignon, Provence-Alpes-Côte d'Azur Region**

**February 9, 2015**

« On the Trail » n°9 p.89

**Seizure of elephant tusks, statuettes, pendants, chess games of unknown origin, for a total of 250 items and 25 kg of ivory dispatched on 2 professional stalls at the 3rd International Minerals Fair**

**Sainte-Marie-aux-Mines, Region of Alsace, France**

**June 26, 2015**

« On the Trail » n°9 p.103

**Seizure of ivory carvings from the monthly Avignon international antiques market**

**Avignon, Provence-Alpes-Côte d'Azur, France June 29, 2015**

« On the Trail » n°10 p.79

**From 7 to 15 September 2015**

**France**

Customs, the National Office for Hunting and Wildlife (ONCFS), the Gendarmerie Nationale (Central Office for the Fight against Harm to the Environment and Public Health - OCLAESP) conducted a joint operation in the ports of Marseille, Toulon, Bastia and Porto Vecchio in Corsica and the airports of Marseille-Marignane, Nice, Roissy and Ajaccio in Corsica. Toll for one week's fight: 35 ivory items and 4 elephant tusks, 17 live European goldfinches and 15 live Hermann's tortoises.

7 more establishments were inspected in the Paris area, 5 are under investigation that may lead to seizures and findings of infringement and 63 suspicious advertisements on the Internet have triggered current investigations. Since the beginning of the year, 475 kg of raw ivory and 575 worked ivory items have been seized by the 3 bodies linked through partnership agreements.

« On the Trail » n°12, p. 110

**February 3, 2016**

**Alpes-Maritimes Department, France**

Seizure at the home of an « e-trafficker » of 3 elephant tusks (among others). The animal products were mixed in with prehistoric remains and medieval coins.

« On the Trail » n°13, p. 97

**May 25, 2016**

**Saint-Denis, Ile de France Region, France**

Seizure of 16 African elephant tusks for a total weight of 212 kg. Searches inside of an export-import company of antiques and various merchandise, a few kilometres north of Paris. Arrest and detention of the company boss. This is the largest ivory seizure carried out in 10 years by French customs. The investigation had started in September of last year when 4 tusks (43 kg) were uncovered in a car with 3 people inside along the route Paris-Poitiers- Bordeaux.

« On the Trail » n°14, p. 97

**RATHKEALE ROVERS**

**July 29, 2016**

**Rennes, Department of Ile-et-Vilaine, France**

They're back again! They're at home in France and well loved. The justice system refuses to extradite them to the United States (cf. "On the Trail" n°9 p. 69, n°10 p. 49).

**September 2015.** The Rathkeale Rovers swindle people with adulterated asphalt, rob museums of rhinoceros horns, and are shady antique ivory appraisers. They were arrested on a road near Poitiers. They had 4 tusks weighing 10 kg each in their vehicle, with valid but intriguing certificates. One of the certificates stated that the owner was a French-Vietnamese director of an export-import company dealing with antiques and cosmetics, based in the Seine Saint Denis geographical department, north of Paris.

**May 2016,** the merchant's warehouse was searched. Among the various goods, 14 tusks were unearthed (cf. "On the Trail" n°13 p. 97). No certificate of origin was available. However, the investigators got a hold on 23 certificates related to tusks that were not on the premises. The businessman was indicted for the organized import, possession, transport, and export of endangered species. He was placed in preventive detention in western France.

**July 29, 2016.** He was denied release on probation. The public prosecutor considered that the cosmetics trade between France and Viet Nam was the perfect cover for trafficking. "Detention is called for, so that he does not flee before the indictment and the consultation with other parties involved." A press article in "Le Télégramme de Brest" revealed that the trafficker met a Rathkeale Rover at the Lille flea market. He denies having close ties with the gang.

**GERMANY**

« On the Trail » n°5 p. 103

**Seizure of 60 kg of ivory**

**Schirnding, Bavaria, Germany**

**May 7, 2014**

"We only have some candy and a picnic" declared the driver of the minivan halted for a road-side check on the way from Regensburg to Frankfurt. The 3 Asian passengers of the vehicle were coming from the Czech

Republic not particularly know for its herds of wild elephants. Customs officers did not back down and ended up finding 60 kg of ivory among the luggage.

« On the Trail » n°7 p. 94

**Seizure of 2 ivory netsuke**

**Hamburg, State of Hamburg, Germany**

**December 2014**

The 2 netsukes were bought on the Internet. They were presented as beef bone sculptures, a misnomer well known to ivory collectors that helps camouflage the traffic. The netsuke are kimono accessories. It is from the 18th century that the use of elephant ivory or marine ivory was developed for netsukes. Hornbills beaks and tortoise shells were also used. The package came from the United States of America. International postal traffic has multiplied by a factor of 10 during the year-end. These 2 small pieces of ivory are drops in the flow of prohibited animal materials that cargo planes dump in December at international airports. At the end of the year the priority is the speed and permanent customs teams are not strengthened. This Hamburg customs catch served in the German press as a teaching aid and a warning to those who buy and sell on digital platforms. Judicial proceedings are instituted against the recipient.

« On the Trail » n°13 p. 96

**April 10, 2016**

**Würzburg, State of Bavaria, Germany**

**Seizure of 70 kg of ivory, namely 7 tusks, on A3 highway in the night following a tipoff from Hamburg**

The ivory was found in the rental car of 2 men with false transportation documents. Thanks to their foreign nationality, the men were freed after paying a fine. Prosecution and further investigation was ordered.

« On the Trail » n°14 p. 97

**August 25, 2016**

**Koblenz, State of Rhineland-Palatinate, Germany**

A development in the seizure of 625 kg of ivory in the Berlin international airport (cf. "On the Trail" n° 13 p. 96). The investigation ended up in a workshop in the former industrial zone in the massif of Hunsrück, near Coblenz. Two Vietnamese craftsmen were busy carving, polishing, and cutting up raw ivory tusks. 570 kg in all. "Many points still need to be cleared up", said the Cottbus public prosecutor.

NB: "On the Trail" n° 13 p. 96: May 31, 2016, Berlin Schönefeld Airport, Germany. Customs at Schönefeld Airport seized 11 crates containing 625 kg of elephant tusk ivory from Africa, destined for Vietnam. According to the Berlin sender, the ivory pieces were "clocks."

**UNITED KINGDOM**

« On the Trail » n°3 p. 68

**Seizure of ivory items**

**Portobello Market, Greater London, United Kingdom**

**December 2013**

The infiltration of a Greater London specialized brigade in Portobello market have resulted in the seizure of numerous ivory items and information to antique dealers about the intricacies of regulation. It is authorized to sell ivory items produced before 1947 if documents certifying the anteriority to the legal date can be produced. Ivory were seized in 17 stalls and at least 3 antique traders will be brought before the court charged with the illegal sale of ivory. The Metropolitan Police Service (Met) has launched operation Gulak one year ago. Police officers are working in plainclothes, focusing on ivory, turtle shell and crocodile skin objects.

« On the Trail » n°3 p. 76

**Court hearing for a man accused with 12 charges for trafficking elephant ivory (among others)**

**Wimbledon, England, United Kingdom**

**October 3, 2013**

Alick Edward Brown faces charged before the Wimbledon Magistrates court for sale of a specimen of an endangered species and unlawfully acquiring a specimen of imported species. His artist's studio was filled with whale vertebrae, turtle shells and whale teeth.



« On the Trail » n°5 p. 103

**Seizure of 211 ivory objects  
London Heathrow Airport, England  
2 April 2014**

The 211 decorative objects in ivory were covered in boot polish. The airport customs were not fooled. This technique of camouflaging is not unknown. The package transported by DHL came from Zambia and was headed to France via the UK. The recipient lives in the suburbs of Paris. The sender in Lusaka. Both are Zambian. The Zambia Wildlife Authority requested to Interpol that the seized ivory be returned in order to, they say, facilitate the completion of the investigations.

« On the Trail » n°6 p. 97

**OPERATION GULAK  
Continued auction house suspected of selling illegal ivory  
London, England, UK  
August 19, 2014**

Chiswick Auctions in West London was sold a carved ivory authenticated by its experts as dating from before 1947. A datation required by regulations of the United Kingdom under the International Convention CITES in case of sale.

The ivory was seized by a police unit specialized in art trafficking. Scientific analysis revealed that the ivory came from an elephant killed in the 60s. The director of the auction house will be brought to justice. He admits a professional error, calls for an isolated incident and promises to be vigilant.

« On the Trail » n°7 p. 94

**Conviction of an auction house for illegal sale of an ivory piece  
London, England, United Kingdom  
October 13, 2014**

Follow up in the Chiswick Auctions case, the auction house whose failures were mentioned in " On the Trail " n°6 p.97. William Rouse admits to an error in dating the "ancient piece carved into an elephant procession." It was not pre-1947, qualification that enabled sale without requesting any certificates. The worked tusk really dated back to the 60s. "We are being used as a scape goat." "The law should better turn its attention to all those who are actively trafficking modern ivory."

« On the Trail » n°10 p. 67

**July 17, 2015  
County of Cumbria, England, UK**

Seizure of 9 pieces of ivory after investigations on line. A young man aged 20 will be heard by the police.

« On the Trail » n°11 p. 86

**October 14, 2015  
London Heathrow Airport, England, United Kingdom**

Seizure of 110 kg of tusks, bangles and beads. The ivory was discovered in an abandoned suitcase arriving from Angola and bound for Hannover, Germany, in terminal 4.

« On the Trail » n°13 p. 97

**May 10, 2016  
Hamilton, Scotland, United Kingdom**

Sentencing to £ 1500 (\$ 2188 US) in fine of LS Smellie and Son Ltd, a historic auction house, for acquisition in a commercial aim and offer to sell via internet raw elephant tusks. The ivory had been seized in May 2015.

« On the Trail » n°13 p. 97

**May 23, 2016  
London, England, United Kingdom**

Conviction of Christie's to £ 3250 (\$ 4742 US) in fine for having put to sale a raw tusk mounted on a silver base. Commercial use of raw ivory that have not been transformed in a significant way into carved ivory is forbidden except special derogation given by the United Kingdom CITES authorities. Christie's defends itself claiming it was an "honest mistake".

« On the Trail » n°13 p. 114

**April 18, 2016**

**Thornaby, England, United Kingdom**

Her bids were made on Ebay. Thanks to a search warrant, NWCU (National Wildlife Crime Unit) agents along with Cleveland police discovered, in the home of a 56 year old woman, 2 sperm whale teeth and 2 carved elephant tusks which cannot be qualified as antiques.

« On the Trail » n°14 p. 98

**September 13, 2016**

**Carlisle, County of Cumbria, England, United Kingdom**

He sold "cow-bone carvings" on eBay. They were clearly made of ivory (cf. "On the Trail" n°13 p.114). This was a fake label to outsmart the eBay filters, which prohibit the sale of ivory on its site, since 2009.

In the United Kingdom, the sale of elephant ivory is prohibited, with the exception of ivory that was worked prior to 1947. The 'worked ivory' label applies to ivory whose raw state - the tusk or tusk section - has been modified to make jewelry, art, decorations, or musical instruments. The seller made up a story: a grandmother who returned from Africa before 1947 had loads of worked ivory in her trunks. The carbon-14 dating that the Court ordered proved that the objects came from elephants that were alive in the 1970s. 27-year-old Shane David Ball, who says he suffers from mental disorder, received a suspended sentence of 7 months of prison, with a preliminary probationary period of 18 months. He must also reimburse £ 1,134 (€ 1,316), for the cost of the carbon-14 dating. Shane refused to provide additional information on the origin of the sculptures and statuettes, which he sold for £ 100 (€ 116) on average.

« On the Trail » n°14, p. 109

**July 22, 2016**

**Cumbria County, England, United Kingdom**

Court hearing for unlawful possession and sale of ivory and a leopard skin (see "On the Trail" n° 13, p. 114). The suspects pleaded not guilty. He's been released under bail. Trial will be held 16 January 2017.

## **SPAIN**

« On the Trail » n°4, p. 89

**Seizure of 20 ivory objects**

**Totana, Autonomous Region of Murcia, Spain February 2014**

OPERATION MARFIL

Same situation in Spain. The 20 ivory pieces did not dispose of documents proving their legal origin and authorizing their sale.

« On the Trail » n°13, p.97

**May 26, 2016**

**Madrid, Spain**

Seizure in an individual's home of 750 kg of African ivory, namely 74 tusks. The suspect tried to justify the legality of the ivory stocks by presenting a hunting certificate from Mozambique from 1970.

Value estimated by Spanish customs: 200,000 € (\$ 224,000 US), for \$ 300 US/kg each, which is much lower than normal quotations in the western world and in Asia.

## **NETHERLANDS**

« On the Trail » n°4, p. 104

**Seizure of 2 elephant tusks (among others)**

**Eindhoven, Province of North Brabant, Netherlands**

**January 2014**

Alert on the Internet. Netherlands police received information from abroad. Investigations led to a 15 year old boys home where everything- computers, skins, tusks and the little baby tiger- was seized.

« On the Trail » n°8, p. 89

**Seizure of 2 tusks**

**Bois-le-Duc, Province of North Brabant, Netherlands**

**Mars 2015**

Following information provided by the police, the health authorities operated the seizure in a private home. The person proposed tusks for sale on the internet.

« On the Trail » n°9, p. 88

**Seizure of elephant ivory (among others)**

**Netherlands**

**April 2015**

During an antiques show in the “Utrecht Fair” exhibition center, 73 raw and carved ivory pieces were seized including more than a dozen elephant tusks. 3 traders, a German, a Belgian and a Scottish are involved. The Dutch Authority for food products and consumer safety mimics the Avignon Customs in France that regularly seize ivory during international fairs.

In the Province of South Holland, 25 ivory objects including netsukes, were seized. They were offered for sale on the Internet.

« On the Trail » n°14, p. 109

**End of August 2016**

**Oss, North Brabant Province, Netherlands**

Impressive and full of lessons to learn. People are always talking about the Africa-China or Africa-Europe traffic. There is also proof of China-Europe traffic.

After the 345 kg of coral in a container arriving from China was seized in the port of Rotterdam, the police raid of the importer’s warehouse revealed 2 tons of ivory, snake skins, monkey skulls, turtles, crocodiles, sawfish rostrums, and stuffed monitor lizards. This warehouse is in an ideal location with easy access to the highway system, offering a lot for Asian communities and European fans of ivory and gruesome objects.

**ITALY**

« On the Trail » n°8, p. 68

**Seizure of an ivory Christ crucifix, an elephant tusk section and 3 rhinoceros horns**

**Milan Malpensa Airport, Lombardy Region, Italy March 2015**

The Chinese citizen was going back home.

« On the Trail » n°8, p. 105

**Seizure of 50 carved ivory (70 kg) from elephant or hippopotamus**

**Rome, Lazio Region, Italy**

**March 2015**

The total value is estimated to be € 50,000.

« On the Trail » n°9, p. 89

**Seizure at a collector’s home of 14 carved tusks, a lamp, 35 statues 80 cm high, a vase, a cane, 92 small carved ivory pieces, a crucifix, many weapons with ivory handles (total 400 kg)**

**La Spezia, Liguria Region, Italy April 2015**

« On the Trail » n°12, p. 96

**February 17, 2016**

**Catania, Region of Sicily, Italy**

**Seizure of 9 objects made of ivory including a 1.30 m long tusk in a consignment shop.**

« On the Trail » n°14, p. 97

**REPEATED OFFENSE/ FAMILY AFFAIRS**

**July 30, 2016**

**Padua, Region of Veneto, Italy**

The Fiat 500 of the father and son was full of antique books, porcelains, and paintings. There were also 4 ancient worked ivory of Arctic and African origin. The father had already been mixed up in pillaging cultural heritage. Both of them were arrested. According to the initial examination, the cargo is worth at least € 50,000.

## **PORTUGAL**

« On the Trail » n°9, p. 89

**Seizure of 129 carved ivory pieces and 2 tusks weighing 14 kg each**

**Lisbon, Region of Lisbon, Portugal**

**June 2015**

## **SWEDEN**

« On the Trail » n°14, p. 98

**August 2016**

**Göteborg Landvetter Airport, Sweden. 3 pieces of sculpted ivory were seized.**

## IVORY TRAFFICKING IN EUROPE – EVIDENCE ABROAD

Some examples from « On the Trail »,  
Robin des Bois' quarterly information and analysis bulletin on animal poaching and smuggling

Full English version available at

<http://www.robindesbois.org/en/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande/>

Original in French

<http://www.robindesbois.org/a-la-trace-bulletin-dinformation-et-danalyses-sur-le-braconnage-et-la-contrebande/>

These tusks and carved ivory items bought on the European market but seized abroad are illegal whenever the poaching and/or the initial contraband from elephant range States occurred.

### **CHINA**

« On the Trail » n°1 p. 26

**Sentence to 7 years in prison and 150,000 Yuan (about US\$ 24,500) for the contraband of ivory and rhinoceros horns**

**Shanghai, China**

**June 12, 2013**

The Chinese antique dealer brought back from his trip in Paris 4 white rhinoceros horns, 3 decorative items made of rhinoceros horn and 14 ivory figurines in place of the porcelain of which he is a specialist. He was arrested by Shanghai Airport customs. He claimed that he didn't wish to sell these items but merely enhance his personal collection and make gifts to his friends. These "trinkets" were bought in Paris for 180,000 Yuan, which is about 23,000€. The market value in China is 3 million Yuan, or about 380,000€. He was sentenced to 7 years in prison.

« On the Trail » n°6 p. 93

**Seizure of 11 ivory billiard balls (2 kg)**

**Nanjing, Jiangsu Province, China August 18, 2014**

French Customs got scammed. The 2 parcels indeed contained billiard balls, but in ivory and not artificial stone as stated.

« On the Trail » n°6 p. 95

**Seizure of an ivory sculpture (1.2 kg)**

**Yantai, Shangdong Province, China**

**September 2014**

The carved tusk had left France in an international postage box without any problem.

« On the Trail » n°7 p. 114

### **FAMILY AFFAIRS**

**Arrest of 2 British citizens and an antique dealer**

**Fuzhou, Province of Fujian, China**

**November 27, 2014**

The event took place at the end of July. It was not announced until the end of November. Mrs. Hu and her husband Mr. Hu, British on their passports, Chinese origin, were going to visit family. The couple was being waited for at the airport. Since 2013, custom officers had discovered that the couple settled in the United Kingdom would regularly send illegal packages to their uncle, an antique dealer in the town-district of Fuqing. The first finding made by customs was a batch of ivory pearls. By the postal service or on the occasion of family visits, a total of 124 carved ivories, a cane made of rhino horn and a gigantic tiger skin were bought goodness knows where in the United Kingdom and illegally smuggled into China. The 3 of them are set under judicial monitoring. Total value of the trafficking is estimated between 1.2 and 1.5 million yuans (200,000 to 244,000 US\$).

« On the Trail » n°7 p. 89

**Seizure of tusks and carved ivory (7,438 g)**

**Jiangmen, Guangdong Province, China**

**October 2014**

Services surveying the transit of animals and foods seized the objects in a parcel that was supposed to contain a vase. This is the first time that EMS, a Chinese transport and package delivery company, is implicated in such trafficking. The package came from England and was addressed to a company in Jiangmen.

« On the Trail » n°7 p. 90

**Seizure of 17 pieces of ivory (5.18 kg)**

**Wenzhou, Zhejiang Province, China**

**October 2014**

Registered as “pens boxes” from Portugal, the seizure is estimated worth 200,000 yuans (32,507 US\$).

« On the Trail » n°9 p. 87

**Seizure of 14 ivory sculptures purchased in Italy by a Chinese merchant and evaluated at 400,000 Yuans (\$ 64,500 US)**

**Wenzhou, Zhejiang Province, China**

**June 2015**

« On the Trail » n°9 p. 88

**FAMILY AFFAIRS**

**Seizure of 6 ivory figurines with a total weight of 3.79 kg, and arrest Zhao in Tianjin Shijiazhuang, Hebei Province, China**

**June 25, 2015**

The package came from France. It was sent by a cousin of Zhao.

« On the Trail » n°12 p. 92

**February 11-24 2016**

**Port of Tianjin, Autonomous Region of Tianjin, China**

Seizure of 700 g of ivory in 6 packages coming from Great Britain, Italy, and the United States of America with the same destination address.

**VIETNAM**

« On the Trail » n°1 p. 35

**21kg of Ivory objects seized**

**Tan Son Nhat International Airport, Ho-Chi-Minh-City, Viet Nam**

**June 30, 2013**

A man of Vietnamese origin, coming from the Paris Roissy Airport, was arrested on arrival at the Ho-Chi-Minh-City Airport with ivory objects from Africa in his carry-on-bag.

« On the Trail » n°4 p. 87

**Seizure of 4.2 kg of ivory**

**Ho-Chi-Minh city, Vietnam**

**February 12, 2014**

Departing Paris. Destination Hanoi. But the airfreight company made a mistake and the package ended up in Ho-Chi Minh city. The seizure consists of 3 segments of a tusk, 2 of them measuring between 45 cm long with a maximal circumference of 15 cm. The 3rd measured 33.5 cm long and a circumference of 33 cm. The whole is estimated at 2 million VND (9600 US\$). The Vietnamese Institute of tropical biology confirmed the African origin. The lost package contained clothes like the customs documents stipulated. The clothes were used to pack the ivory.

« On the Trail » n°6 p. 92

**Seizure of 3 tusks (14.6 kg) Ho Chi Minh City, Vietnam August 1, 2014**

Another failure by French customs on an air cargo from Paris to Vietnam (see «On the Trail» n° 4 p.87). Fortunately Ho Chi Minh City colleagues made up for it. The 14.6 kg of white gold were going to Da Nang in the center of the country. Vietnamese experts identified the African origin of this contraband.

« On the Trail » n°9 p. 72

**Seizure of 18 raw and carved tusks (60.56 kg) and 3 rhino horns (4.86 kg)**

**Noi Bai Airport, Hanoi, Vietnam**

**April 16, 2015**

The commercial value of the horn is estimated on the local market at \$ 133 US per gram, that of the ivory at \$ 2.1 US per kilo. Despite the numerous governmental communications and the informational campaigns of NGOs and partner artists, the rhino horns benefits from considerable prestige in Vietnam where the rumor persists that the horn can cure cancer. The packages were transported by air. The raw and carved ivory are from African origin according to experts. The company used was Vietnam Airlines. The messenger service was EMS, Express Mail Service. The shipper is said to reside in Paris on rue Albert. At 19-19 bis rue Albert, in the heart of the first Asian neighborhood of Paris, the Franco-Vietnamese cultural center can be found

« On the Trail » n°9 p. 88

**Seizure of 2 African Ivory sculptures (2.31 kg) originating from France**

**International Airport of Tan Son Nhat of Hô-Chi-Minh-City, Vietnam**

**June 30, 2015**

Furniture came from France. They were accompanied by “2 decorative statues” according to the wording of the customs declaration. The two statues were made of ivory from Africa, analysis by Vietnamese experts can attest.

« On the Trail » n°10, p.63

**Mid-July 2015**

**Ho Chi Minh City, Vietnam**

Seizure of a carved tusk (1.4 kg) from a package sent from France. The ivory is of African origin.

« On the Trail » n°14, p.95

**Mid July 2016**

**Ho Chi Minh City, Viet Nam**

The 8 circular gift packets in the package that the courier service sent had sections of the adult tusk, as the postal customs of Ho Chi Minh City airport suspected. The consignee lives in the Mekong Delta and does not have any kind of authorization to import the ivory. He had a hearing in Court. The “gifts” came from Prague. This Czech/Vietnamese ivory business is still booming (cf. “On the Trail” n°4 p. 4, n°5 p. 103, p.104, n°6 p. 96).

## **TAIWAN**

« On the Trail » n° 12

**February 20, 2016. Tainan, Taiwan**

Seizure at the home of a couple who were non-registered antique dealers of 422 carved ivories (estimated value at \$ 310,667 US) bought from an online auction on Internet site notably in France and the United Kingdom. The couple claims they had in the past began the necessary paperwork to register but had been discouraged by the slowness of the administrative procedures.

## **THAILAND**

« On the Trail » n° 3, page 67

**Seizure of 15 mega ivory tusks**

**Bangkok, Province of Bangkok, Thailand December 13, 2013**

Belgian customs let it go by. Yet the shipment was of quite a size. Will European border police make good use of the information communicated to them by Thailand? The total value is estimated to be US\$ 1.5 million.



## **NEW ZEALAND**

« On the Trail » n° 11, page 81

**December 22, 2015**

**Napier, Hawke's Bay, New Zealand**

A man was ordered to pay \$ 8000 NZ (\$ 5477 US) for importing 31 worked ivories (see "On the Trail" n° 5 p. 104). He is also responsible for the cost of genetic tests on the items (\$ 410 US). He bought a carved African elephant tusk in France. Following his request, the French or European sender accepted to qualify the tusk as a "decorative object of resin". The shipping occurred in June 2012. He used to resell things online under false designations, such as "fake ivory" or "ox skeleton". He also runs a shop where he sells carved jade and wood.

« On the Trail » n° 2, page 55

**A man sentenced to a US\$ 12,000 fine for the illegal importation of ivory**

**Manukau, Auckland, New Zealand**

**July 10th, 2013**

In September 2011, 2 ivory objects were intercepted in their packages coming from the United Kingdom and Portugal. Authorities discovered other ivory articles (statues, carved tusks, engraved letters) at the parcels' destination, the home of Jiezhen Jian, a 57 year old retiree of Chinese origin. After previously defending himself for knowing the value of ivory, he then admitted he favoured ivory objects due to their artistic and speculative worth. Over a period of 10 months, he had bought 299 objects made from precious materials and resold them in China over the Internet. This is the first time in New Zealand that someone has been convicted for illegally importing ivory.

## **UNITED STATES OF AMERICA**

« On the Trail » n° 8, page 67

**Arrest for rhinoceros horn and elephant ivory trafficking**

**St. Cloud, State of Minnesota, United States of America**

**March 31, 2015**

The philosophy professor, specialist of the French writer Jean-Paul Sartre and of Chinese religions was also a horn, libation cup, and ivory trafficker. Yiwei Zheng's double life is disturbing for St. Cloud State University. His passport was confiscated and he was released on bail for \$ 25,000 US. He will be able to resume teaching, until his trial and his imprisonment without remission -the usual sentence that American courts issue for ivory and rhinoceros horn traffickers.

Via eBay and his online business called "Crouching Tiger Antiques", Zheng is accused of introducing and exporting carved ivory and other antiques made of rhinoceros horn to and from the United States of America, between 2006 and 2011. Summing up the situation, the prosecutor Laura Provinzino said that such activities feed into the black market and thus threaten vulnerable animal species. "On the Trail" notices how Zheng bought a libation cup at the renowned auction house Christie's, in Paris. He then illegally had it sent from France to the United States via FedEx. This is just one of his offenses. Zheng was in contact with his accomplices of Chinese origin. They also lived in the United States or were in transit. He sold his suspicious "antiques" to them. The 2 rhinoceros horn transactions took place in a McDonald's in St. Cloud/ Minnesota.

« On the Trail » n° 13, page 77

**May 9, 2016**

**Minneapolis, State of Minnesota, United-States of America**

The well respected university professor at Saint Cloud University, now ex-professor, who purchased an antique cup made from a rhino horn at Christie's in Paris and is an international trafficker selling via the Internet, otherwise also a specialist of the French writer Jean-Paul Sartre (see "On the trail" n°8 p. 66) was sentenced to a \$ 500,000 US fine, 3 years parole and 150 hours of community work. Zheng, 43 years old, illegally imported to the US and exported over one million US\$ worth of ivory and rhino horn antiques.