

21st May 2018

Committee Secretary  
Parliamentary Joint Committee on Law Enforcement  
Department of the Senate PO Box 6100  
Parliament House  
CANBERRA ACT 2600

**Submission by Two Million Tusks UK to the Parliamentary Joint Committee of Law Enforcement in support of a total ban of Australia's trade in ivory and rhino horn**

Dear Sir/Madam,

Formed in 2016, Two Million Tusks UK are a small team of independent investigative researchers - citizen scientists. Our work is borne out of a desire to help save the endangered African elephant from extinction and to highlight how the trade in ivory, disregarding age, fuels demand for all ivory.

**UK and Australian ivory trade**

Whether in the UK, Australia, or any other country where there is domestic trade in ivory, the findings are very likely to be the same; illegal ivory masquerades as legal 'antique' ivory and no one seems able to adequately tell the difference or can prove the age.

In October 2017 we published our detailed, evidence based report Ivory: The Grey Areas ([www.twomilliontusks.org](http://www.twomilliontusks.org)) exposing the UK's immense and unregulated ivory trade, while providing the British Government with their first ever evaluation of trading within UK auction houses.

The key findings were shocking:

- For 90% of the lots investigated, auction houses did not satisfy the legal requirement to demonstrate proof of age for pre-1947 ivory
- Ivory represents less than 1% of annual sales for many auction houses in the UK
- UK legal ivory trade is providing cover for the illegal trade

Two Million Tusks carried out three in-depth studies researching the trade in ivory pieces by auction houses in the UK.

In our first study we contacted 72 auction houses about 180 ivory lots and the vast majority (90%) of the lots were unable to comply with the legal requirements to demonstrate proof of age for all ivory pieces dated pre 1947.

During a three month timeframe our second study, a financial analysis of 232 auction houses covering 420,000 lots showed ivory lots formed only 0.70% of the total number of lots for sale. An update involving 301 auction houses analysing 820,000 lots found a similar figure of 0.76% proving how insignificant ivory sales are to many UK auction houses. Our final study reviewed every auction held by a prestigious leading auction house over a three year period and we discovered ivory lots only formed 1.49% of their sales.

The volume of ivory sales throughout the UK is high but the revenue derived from sales to each individual business is low. Therefore, it would be incorrect to conclude an ivory ban would be damaging to any business.

Additionally, it is not the case the antique trade can advance a “quality over quantity” argument as the vast majority (91%) of ivory pieces sold at auction was £400 or less.

Two Million Tusks research and investigations went several steps further than the Australian IFAW ivory report but revealed the same shameful findings and bore striking similarities. **There is no reason to assume that Australia does not have the same depth of problems as the UK.**

Chief Inspector Martin Sims, former Head of the National Wildlife Crime Unit, (NWCU) said of the study: “Two Million Tusks have highlighted significant issues within the antique industry whereby many auction houses try to sell ivory without even knowing the law nor the provenance/proof of age of the items they are trying to sell.”

During our investigations we found the trade, who claim they are experts, were in fact unable to date ivory and many wouldn't even hazard a guess as to the age of the pieces they were selling. The trade were unable to provide proof of age for 90% of the ivory lots investigated and the remaining 10% were given very lenient benefit of the doubt. Furthermore, UK auction houses then set themselves up to have complete immunity from any consequences due to the clauses within their terms and conditions.

Two Million Tusks evidence has helped influence and shape the UK Government's recent decision to announce one of the world's ‘toughest’ ivory bans. The announcement made in April 2018 by Michael Gove, Secretary of State for DEFRA (Department for Environment Food & Rural Affairs) was the official response to the UK Government's Ivory Ban Consultation, held over a 12 week period between October - December 2017.

The near complete ivory ban is an important and historic move forward for the UK. Along with other countries implementing a ban, it will help play an intrinsic part in halting the decline of elephant populations while also stemming the flow and demand for ivory, within the UK and overseas.

### **Ivory: A grisly trade**

Historically ivory has always represented a grisly, bloody past for both humans and elephants. From the caravans of slaves; men taken from their communities and loved ones in order to carry the tusks to port and sold off with the ivory - never to be seen again by their mothers, wives or children. Right through to today, where the multi billion dollar ivory industry funds terrorism, war lords and human trafficking.

Approximately every 15 minutes an elephant is slaughtered in Africa. If people were to set their alarm clocks every fifteen minutes and each time the piercing sound goes off acknowledge that another elephant has been shot, snared, poisoned or speared, it would make even the heartless reflect. Whether old ivory or new, the fact is the same, nearly every piece of ivory represents a poached elephant and a sequence of horrific events. Who can possibly justify that for the sake of an ornament?

## **Ivory: A tragic trade**

Every elephant poached today is another tragedy on the approaching road to extinction. Every ranger killed, approximately 1,000 in the last decade, trying to protect elephants, is another tragedy for their families. This is all happening on our watch. Is this what we want to tell the next generation, we are sorry.... and yes, we could have done more?

Ivory is just a very small part of all the other wonderful antiques that so richly embellish the world. Do we all just stand by and let some, with their own selfish reasons of wanting to sell or buy ivory prevail over this continued holocaust on elephants and people?

## **Ivory: The present domestic global ban situation**

USA - July 2016 announced a total state ban

<https://www.usnews.com/opinion/articles/2016-06-04/obamas-ivory-ban-puts-africas-phants-on-path-to-recovery>

CHINA - December 2017 announced total ban and closure of all carving facilities

<http://www.bbc.co.uk/news/world-asia-china-42532017>

HONG KONG - January 2018 announced timeline for a ban

<https://www.reuters.com/article/us-hongkong-ivory/hong-kong-lawmakers-following-china-vote-to-ban-ivory-sales-idUSKBN1FK1NA>

UK - April 2018 announced one of the toughest bans in the world

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/696474/banning-ivory-consult-sum-resp.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/696474/banning-ivory-consult-sum-resp.pdf)  
[www.twomilliontusks.org](http://www.twomilliontusks.org)

TAIWAN - April 2018 announced a ban by 2020

<http://wwf.panda.org/?325855/Taiwan-announces-plan-to-ban-domestic-ivory-trade>

EU - July 2018 awaiting an announcement

<https://www.independent.co.uk/news/world/africa/ivory-trade-eu-ban-african-countries-phant-poaching-demand-animal-welfare-rights-a8259936.html>

CANADA - under pressure. March 2018 letter by Elephanatics organisation with 95 signatories submitted to the Canadian government to bring in a domestic ivory ban

<https://elephanaticsdotorg.files.wordpress.com/2018/03/canadian-domestic-ivory-ban-letter-mar-14-final-version-sig.pdf>

JAPAN - under pressure

<https://www.japantimes.co.jp/news/2018/01/18/national/japan-renewed-pressure-ban-ivory-exports-china-bans-domestic-trade/#>

<http://www.traffic.org/home/2017/6/23/ivory-seizure-exposes-japans-lax-domestic-ivory-trade-control.html>

AUSTRALIA ?

<http://www.abc.net.au/news/2018-04-05/ivory-trade-in-australia-could-be-encouraging-phant-poaching/9619524>

We hope the Australian government will enact a total ivory ban and additionally prohibit the domestic trade in rhino horn. Elephants and rhinos are both keystone umbrella species. This means their survival or demise directly impacts the survival or demise of other species of mammals, birds, insects, fish and plants. Both animals are vital to the ecosystem on which we all depend and have been on this planet for millions of years and yet, astonishingly, through human avarice could become extinct within a couple of decades.

If Australia implements a domestic ivory and rhino horn trade ban it sends a powerful message to the international community of commitment in the critical fight against endangered species wildlife crime.

The power is in all our hands to do something, to make a difference, institute change and be part of the global solution, rather than part of the problem.

Your sincerely,

Two Million Tusks UK

#### References:

The history of the ivory trade

<https://www.nationalgeographic.org/media/history-ivory-trade/>

Every 15 minutes an elephant is killed for its ivory.

<http://www.worldanimalfoundation.org/articles/article/8950044/186390.htm>

Elephants on the path to extinction

<https://www.theguardian.com/environment/2016/aug/12/elephants-on-the-path-to-extinction-the-facts>

The human price of guarding wildlife

<https://www.theguardian.com/environment/2016/dec/10/protect-wildlife-rangers-murder>

Ivory funding terrorism and criminal networks

<http://www.lastdaysofivory.com/>

IFAW report reveals how Australian auction houses contribute to illegal ivory trade

<https://www.ifaw.org/australia/news/shocking-ifaw-report-reveals-how-auction-houses-australia-contribute-illegal-ivory-trade>