



## Impact of the Trade in Ivory on Endangered Species Debate on 21 December 2017

### Summary

On 21 December 2017, the House of Lords is due to debate a motion moved by Lord Carrington of Fulham (Conservative) “that this House takes note of the impact of the trade in ivory on endangered species, and of the efforts being made to eliminate that trade while protecting the cultural heritage of antique ivory”.

According to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), ivory can be used to describe any “mammalian tooth or tusk of commercial interest which is large enough to be carved or scrimshawed”, although it contends that the term was “traditionally applied only to the tusks of elephants”.

In August 2016, the Great Elephant Census reported that savanna elephant populations declined by 30 percent between 2007 and 2014, equivalent to the loss of 144,000 elephants. The survey found the current rate of decline in numbers was 8 percent per year, which researchers who conducted the survey contend is primarily due to poaching. Likewise, conservation organisations such as Tusk, also attribute the decline in elephant numbers to poaching, mainly due to an increase in demand for ivory.

Data gathered by the Environmental Investigation Agency for the period 2010–15 has revealed that the UK was the largest exporter of legally traded ivory with 36,135 items exported globally. In comparison, the second highest exporter was the United States, with 9,824 items. The wildlife trade monitoring network, TRAFFIC, surveyed antique markets in London and found that there were fewer individual market stalls selling ivory in 2016 compared to 2004, declining from 640 to 200 stalls. The total number of products containing ivory for sale also fell, from 6,000 in 2004 to 3,200 in 2016. Conservation groups such as Elephants DC contend that there are several issues related to antique ivory, particularly, in illegal ivory entering legal markets disguised as antique ivory, due to difficulties in determining how old a piece of ivory is. Whilst museums and antique dealers contend that antique ivory is part of the UK’s cultural heritage.

To tackle the illegal wildlife trade, the UK has taken several measures, including, being a party to the CITES, which aims to ensure the international trade in specimens of plants and wild animals does not threaten their survival. In addition to their commitments under the Convention, successive UK governments have sought to introduce a ban on the sale of ivory. The Government argues that its proposals for a total ban would go further than CITES, by proposing to prohibit ivory sales in the UK, and to prohibit the import and export of ivory for sale to and from the UK.

### Table of Contents

1. Introduction
2. Statistics
3. Convention on International Trade in Endangered Species of Wild Fauna and Flora
4. UK Government Policy Since 2015
5. Further Reading

## Table of Contents

1. Introduction	1
2. Statistics	2
2.1 African Elephant Population Numbers.....	2
2.2 Ivory Trade in the UK.....	3
3. Convention on International Trade in Endangered Species of Wild Fauna and Flora	4
4. UK Government Policy Since 2015	7
5. Further Reading	10

---

A full list of Lords Library briefings is available on the [research briefings page](#) on the internet. The Library publishes briefings for all major items of business debated in the House of Lords. The Library also publishes briefings on the House of Lords itself and other subjects that may be of interest to Members.

House of Lords Library briefings are compiled for the benefit of Members of the House of Lords and their personal staff, to provide impartial, authoritative, politically balanced briefing on subjects likely to be of interest to Members of the Lords. Authors are available to discuss the contents of the briefings with the Members and their staff but cannot advise members of the general public.

Any comments on Library briefings should be sent to the Head of Research Services, House of Lords Library, London SW1A 0PW or emailed to [purvism@parliament.uk](mailto:purvism@parliament.uk).

## I. Introduction

According to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), ivory can be used to describe any “mammalian tooth or tusk of commercial interest which is large enough to be carved or scrimshawed”, although they contend that the term was “traditionally applied only to the tusks of elephants”.<sup>1</sup>

This Briefing examines the impact of the trade in ivory on endangered species, particularly with reference to the domestic ivory market in the United Kingdom for both ‘modern day’ and antique ivory. It also discusses the UK’s obligations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora, in addition to measures taken by successive UK governments to eliminate the trade of ivory in the UK, whilst protecting the cultural heritage of antique ivory. This includes the introduction of policies varying from a ban on modern ivory sales and more recently, a total ban on the sale of ivory in the UK.

This Briefing also outlines the contentions in including antique ivory—which the UK Government identifies as items containing ivory dating prior to 1947<sup>2</sup>—in such bans, with some organisations arguing that antique ivory is a part of the UK’s cultural heritage, and others contending that it has allowed illegal ivory to enter the market. Consequently, a number of museums, including the British Museum and the Victoria and Albert Museum, had previously called on the Government to ensure that antique ivory works of art were made exempt from the ban. According to the Museums Association, a total ban without such exemptions could affect museums’ ability to acquire items relevant to their collection, as well as loans and touring exhibitions.<sup>3</sup>

In contrast, conservation organisations, such as the International Fund for Animal Welfare, have opposed antique ivory markets for their role in what they describe as facilitating the illegal ivory trade. In addition, several conservation organisations, such as Elephants DC, have stated that there are issues related to antique ivory, particularly in illegal ivory entering legal markets disguised as antique ivory. Elephants DC argue this is occurring due to a number of factors, including: the ease of which ivory can be chemically or cosmetically treated to make modern ivory look antique; and the difficulty to determine the age of ivory pieces.<sup>4</sup>

---

<sup>1</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, [Identification Guide for Ivory and Ivory Substitutes](#), 22 April 2005.

<sup>2</sup> Department for Environment, Food and Rural Affairs, [‘UK Ban on Modern Day Ivory Sales’](#), 21 September 2016.

<sup>3</sup> Museums Association, [‘Should Antique Objects Remain Exempt from the Ivory Trading Ban?’](#), 27 February 2017.

<sup>4</sup> Elephants DC, [‘Is Antique Ivory Really That Bad? Five Reasons to Support a Total Ban’](#), 22 April 2014.

## 2. Statistics

Conservation groups such as the World Wildlife Fund, contend that the trade in ivory directly impacts animal populations, particularly African elephants, whose population has declined in recent years. This section will examine the consequences of the ivory trade: African elephant population numbers; and the prevalence of items containing ivory in the UK.

### 2.1 African Elephant Population Numbers

A joint report by the United Nations Environment Programme and Interpol has revealed the illegal global trade in wildlife is estimated to be worth up to US\$23 billion annually. They note that illegal trade in wildlife, including in endangered species, is now the fourth largest criminal enterprise behind drug smuggling, counterfeiting and human trafficking.<sup>5</sup> They argue that the trade has a “devastating” impact on the environment, leading to the “decimation” of animal species, because of poaching for ivory.<sup>6</sup>

In August 2016, the Great Elephant Census, the first-ever pan-African survey of savanna elephants, reported that populations declined by 30 percent between 2007 and 2014, equivalent to 144,000 elephants.<sup>7</sup> The survey found that the current rate of decline was 8 percent per year, which the authors contended was primarily due to poaching.<sup>8</sup> The Census also noted that, although 84 percent of the elephants surveyed were sighted in legally protected areas, high numbers of elephant carcasses were discovered in such areas, indicating that elephants were “struggling both inside and outside parks”.<sup>9</sup>

In March 2017, the Convention on International Trade in Endangered Species of Wild Fauna and Flora’s Programme for Monitoring the Illegal Killing of Elephants published a report into African elephant poaching. The report revealed that, although the steady increase in the levels of illegal killing of elephants since 2006 had been “halted and stabilised”, it remained at levels that are “unacceptably high”.<sup>10</sup> The authors also noted that estimated poaching rates overall remained higher than the normal growth rate of elephant populations, meaning these populations remained in decline.<sup>11</sup>

---

<sup>5</sup> United Nations Environment Programme, [‘Illegal Trade in Wildlife’](#), 20 April 2017.

<sup>6</sup> *ibid.*

<sup>7</sup> Great Elephant Census, [Census Results Summary](#), 31 August 2016, p 1.

<sup>8</sup> *ibid.*

<sup>9</sup> *ibid.*

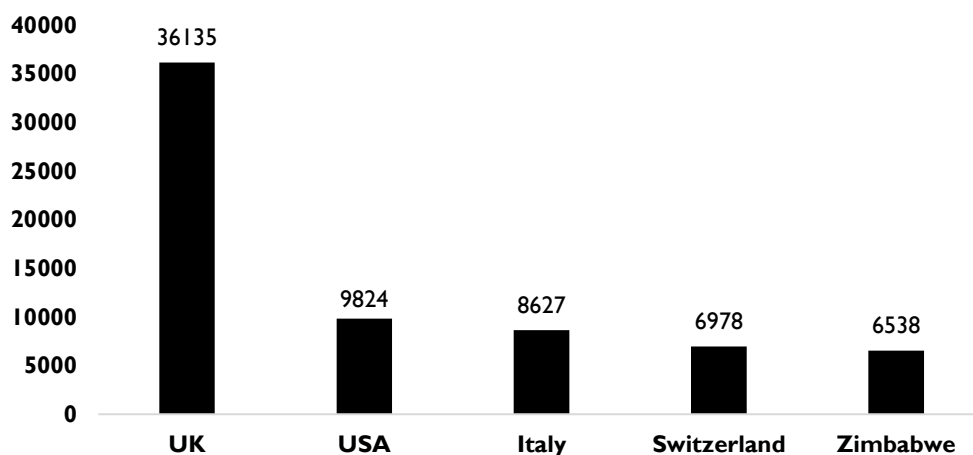
<sup>10</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, [‘2016 Trends In African Elephant Poaching Released—Cites Mike Programme’](#), 3 March 2017.

<sup>11</sup> *ibid.*

## 2.2 Ivory Trade in the UK

According to data gathered by the Environmental Investigation Agency, a non-governmental organisation, between 2010 and 2015, the UK was the largest supplier of legal ivory in the world.<sup>12</sup> The data also revealed that the UK exported 370 percent more ivory items globally at 36,135, than the United States, who were the next highest exporter with 9,824 items globally.

**Table 1: Global Ivory Exports for 2010–15 by Number of Items**



(Source: Environmental Investigation Agency, [‘UK is the Largest Supplier to the World’s Ivory Markets’](#), 10 August 2017)

Regarding the prevalence of antique ivory in the UK, data gathered by the wildlife trade monitoring network, TRAFFIC, reveals that the antique ivory market in the UK has “declined significantly” since 2004.<sup>13</sup>

In the UK, it is still legal to buy and sell both antique and modern ivory, if sellers have the correct certification.<sup>14</sup>

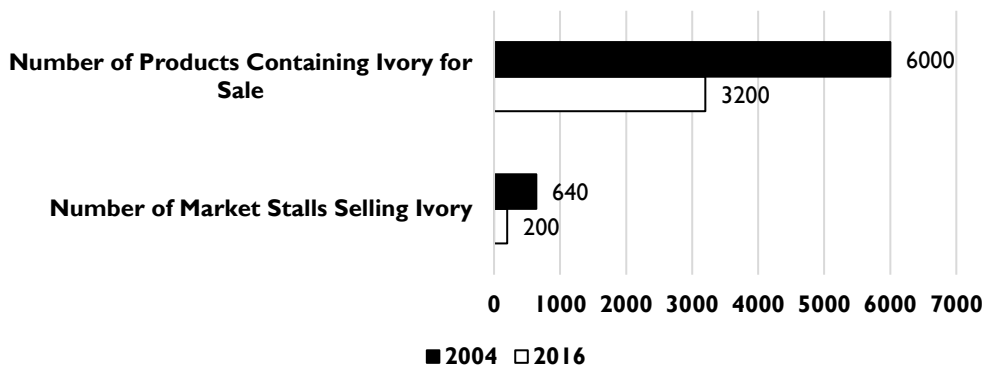
Researchers from TRAFFIC visited 13 antiques markets and two areas with antiques shops across London and carried out online searches to record the number of items containing ivory that were for sale in the UK. Its findings revealed that there were fewer individual market stalls selling ivory, declining from 640 stalls in 2004 to 200 in 2016. Similarly, the total number of products containing ivory for sale also fell, from approximately 6,000 in 2004 to 3,200 in 2016.<sup>15</sup>

<sup>12</sup> Environmental Investigation Agency, [‘UK is the Largest Supplier to the World’s Ivory Markets’](#), 10 August 2017.

<sup>13</sup> TRAFFIC, [‘New Surveys Find Significant Though Declined UK Antiques Ivory Market’](#), 31 August 2016.

<sup>14</sup> *ibid.*

<sup>15</sup> *ibid.*

**Table 2: TRAFFIC's Findings into the Antiques Ivory Market in the UK, 2004 and 2016**

(Source: TRAFFIC, '[New Surveys Find Significant Though Declined UK Antiques Ivory Market](#)', 31 August 2016)

TRAFFIC attribute the physical market decline to several factors, including the emergence of online sales and/or stricter legislation, which traders contended had led to reduced prices and demand for items containing ivory.<sup>16</sup>

### 3. Convention on International Trade in Endangered Species of Wild Fauna and Flora

To tackle the consequences of the illegal wildlife trade, such as poaching and illegal ivory entering legal markets, the UK has taken several measures. This includes being a party to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The Convention is an international agreement between governments, with the aim of ensuring that trade in specimens of plants and wild animals does not threaten their survival. The UK became a party to the Convention on 2 August 1976, (with entry coming into force on 31 October 1976), and as of 10 December 2017, there are 183 parties bound by the provisions of the Convention.<sup>17</sup>

CITES works by subjecting the international trade in specimens of selected species to certain restrictions. An agreement in 1989 to prohibit the international trade in ivory apart from in "exceptional circumstances", by placing African elephant ivory in Appendix One,<sup>18</sup> was brought in under the Convention on International Trade in Endangered Species of Wild Flora and Fauna (CITES).<sup>19</sup>

<sup>16</sup> TRAFFIC, '[New Surveys Find Significant Though Declined UK Antiques Ivory Market](#)', 31 August 2016.

<sup>17</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, '[List of Contracting Parties](#)', accessed 7 December 2017.

<sup>18</sup> As part of the Convention, species of both animals and plants are categorised under three appendices, in accordance with the degree of protection that they need.

<sup>19</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, '[How CITES Works](#)', accessed 7 December 2017.

Under the Convention, all import, export, re-export and introduction of species covered by CITES must be authorised through a licensing system. Each party to the Convention must designate one or more Management Authorities to administer the licensing system and at least one Scientific Authority to advise the party of the effects of trade on the status of a species covered by CITES.<sup>20</sup> In the United Kingdom, the Animal Plant and Health Agency (APHA) is the UK's licensing authority. According to the Department for Environment, Food and Rural Affairs, traders must apply to APHA for appropriate permits or certificates if they want to: import or (re-) export items containing ivory from or to a country outside the EU; or use ivory in commercial activities within the EU.<sup>21</sup>

The UK's policy is to not issue documents authorising the sale of, or other commercial trade in, raw African ivory, regardless of its age.<sup>22</sup> For worked or antique items containing ivory produced prior to 3 March 1947, traders do not have to apply to the APHA for certificates to authorise trade in ivory within the UK or other EU countries, although a permit is needed to either import or re-export ivory outside the UK. For worked ivory items produced after 3 March 1947, commercial use within the UK or EU is only permitted with a commercial use certificate granted by a member state Management Authority (which in the UK's case is APHA). However, the issuing of certificates is subject to case-by-case assessment.<sup>23</sup>

Approximately 5,800 species of animals and 30,000 species of plants are protected by the Convention.<sup>24</sup> These species are categorised under three appendices, in accordance with the degree of protection that they need:

- Appendix 1: Species included on this list are those which are threatened with extinction, such as African elephants.<sup>25</sup> The Convention notes that trade in this species is permitted only in exceptional circumstances.
- Appendix 2: This includes species who are not necessarily threatened with extinction, but whose trade must be controlled to avoid "utilisation incompatible with their survival".<sup>26</sup> Examples are Central American river turtles and pig-nosed turtles.

<sup>20</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, '[How CITES Works](#)', accessed 7 December 2017.

<sup>21</sup> Commercial use covers: purchase, offer to purchase, acquisition for commercial purposes, display to the public for commercial purposes, use for commercial gain and sale, keeping for sale, offering for sale or transporting for sale (Department for Environment, Food and Rural Affairs, '[Banning UK Sales of Ivory](#)', October 2017, p 8).

<sup>22</sup> Department for Environment, Food and Rural Affairs, '[Banning UK Sales of Ivory](#)', October 2017, p 8.

<sup>23</sup> *ibid.*

<sup>24</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, '[The CITES Species](#)', accessed 7 December 2017.

<sup>25</sup> African elephants have been categorised under Appendix 1, with the exception of African elephant populations in Botswana, Namibia, South Africa and Zimbabwe, who are categorised under Appendix 2.

<sup>26</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, '[How CITES Works](#)', accessed 7 December 2017.

- Appendix 3: Species in this appendix are protected in at least one country, with that country asking parties bound to the Convention for assistance in controlling the trade. Species in this category include hyenas and walruses.

CITES is implemented within Europe through European Council regulations 338/97 and 865/06, as amended. According to the Joint Nature Conservation Committee, the European Council regulations implement CITES in a “stricter manner” than is required by the Convention.<sup>27</sup> It notes that the regulations include non-CITES species and contain provisions to prohibit or restrict imports of species considered a threat to native European fauna and flora.<sup>28</sup> These European Council regulations are transposed into UK law through the Control of Trade in Endangered Species (Enforcement) Regulations 1997. Under the regulations, the maximum penalty upon conviction is a five-year prison sentence, a Level 5 fine, or both. The Convention is ratified in UK legislation. The first piece of legislation to give effect to CITES was the Endangered Species (Import and Export) Act 1976.

As the UK is currently operating under EU regulations, its environmental agreements could be impacted by its withdrawal from the EU. According to the then Secretary of State for the Environment, Food and Rural Affairs, Andrea Leadsom, once the UK leaves the EU, it will continue to be party to any international agreements that it has signed up to, such as CITES.<sup>29</sup> However, the United Kingdom Environmental Law Association contends that after the UK leaves the EU, there will need to be “some mechanism” for ensuring that domestic legislation “continues to capture changes” to requirements under international environmental agreements such as the CITES lists of endangered species.<sup>30</sup>

Several organisations have argued that the Convention has been effective in tackling the ivory trade. A number of conservation organisations have praised the Convention for both its role in animal conservation and in regulating the wildlife trade. Kelvin Alie, Executive Vice President at the International Fund for Animal Welfare, states that CITES is the only multilateral environmental agreement that has “jurisdiction to apply protection for wildlife species that can be adhered to by governments”.<sup>31</sup> Whilst, Leigh Henry, a senior policy advisor at the World Wildlife Fund, contends the Convention was “one of the best tools we have for addressing international crime”, outlining that it had regulated the trade of more than

<sup>27</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, ‘[How CITES Works](#)’, accessed 7 December 2017.

<sup>28</sup> *ibid.*

<sup>29</sup> House of Commons Environmental Audit Committee, [Oral Evidence: The Future of the Natural Environment after the EU Referendum](#), 25 October 2016, Q399.

<sup>30</sup> United Kingdom Environmental Law Association, [Brexit and Environmental Law](#), September 2017, p 14.

<sup>31</sup> International Fund for Animal Welfare, ‘[Why is CITES Important for the World?](#)’, International Fund for Animal Welfare Global YouTube Channel, 13 October 2016.



35,000 animal species.<sup>32</sup>

However, there has also been criticism of CITES, particularly with regard to how well it is being implemented by some signatory countries. According to the US Congressional Research Service, as of 2014 approximately 50 percent of countries, including Djibouti,<sup>33</sup> bound by the Convention had not implemented legislation that would cover the responsibilities of CITES, including: establishing management and scientific authorities; prohibition of trade in violation of CITES; penalties for violations; and protocols for confiscating illegally traded animal specimens.<sup>34</sup> It noted that several countries signed to the Convention lack the resources to monitor and police international wildlife trade through their country, consequently considering violations of wildlife trade a “low priority”.<sup>35</sup>

#### 4. UK Government Policy Since 2015

In addition to being party to CITES, successive UK governments have sought to ban the sale of ivory in the UK, varying from plans to introduce a ban on modern day ivory sales to consulting on a total ban.

In its 2015 general election manifesto, the Conservative Party stated that should it be re-elected, a Conservative Government would tackle international wildlife trade by proposing a total ban on ivory sales in the United Kingdom.<sup>36</sup>

On 20 September 2016, in response to a written question on banning ivory, the Parliamentary Under Secretary of State at the Department for Environment, Food and Rural Affairs, Lord Gardiner of Kimble, stated that the Government was:

[A]ctively exploring options with interested parties and other government departments about how to implement the UK Government’s manifesto commitment to press for a total ban on ivory sales.<sup>37</sup>

The following day, the Government announced plans for a ban on sales of modern day ivory in the UK, which it contended would help bring an end to illegal elephant poaching and ivory trafficking.<sup>38</sup> The ban would cover the sale of items containing ivory dated between 1947 and the present day. Trade in

<sup>32</sup> World Wildlife Fund, ‘[Convention on International Trade in Endangered Species of Wild Fauna and Flora](#)’, accessed 10 December 2017.

<sup>33</sup> Convention on International Trade in Endangered Species of Wild Fauna and Flora, [Status of Legislative Progress for Implementing CITES](#), 16 November 2017, p 4.

<sup>34</sup> Congressional Research Service, [The Convention on International Trade in Endangered Species of Wild Fauna and Flora \(CITES\)](#), 21 September 2016, p 12.

<sup>35</sup> *ibid.*

<sup>36</sup> Conservative Party, [The Conservative Party Manifesto 2015](#), 13 April 2015, p 55.

<sup>37</sup> House of Lords, ‘[Written Question: Ivory: Sales](#)’, 20 September 2016, HLI615.

<sup>38</sup> Department for Environment, Food and Rural Affairs, ‘[UK Ban on Modern Day Ivory Sales](#)’, 21 September 2016.

antiques, such as works of arts and ornaments dating from before 1947, would continue to be permitted. According to the then Secretary of State for Environment, Food and Rural Affairs Andrea Leadsom:

Elephants are some of our world’s most iconic animals and it will take truly global action to stop the insidious criminals who selfishly prosper from the ivory trade.

This ban will send the message that the ivory trade is a thing of the past. I hope it increases pressure on other nations to implement bans and save our elephants before they disappear.<sup>39</sup>

The Government also stated that it would consult with environmental groups, industry and other relevant parties to establish how and when a ban could be introduced, in addition to “any necessary exemptions”, by early 2017.<sup>40</sup> However, a consultation did not take place.

On 8 December 2016, Members of the House of Commons debated the ivory trade in the United Kingdom. Responding on behalf of the Government, the Parliamentary Under Secretary of State for the Environment, Thérèse Coffey, stated that poaching was “driven by the demand for ivory products”, and consequently argued the Government was seeking to “change the dynamics of the market”, stating that:

We need to reduce not just the availability of ivory, but the acceptability of the trade. That is why in the UK we [the Government] are looking at our own market.<sup>41</sup>

On 17 January 2017, the House of Commons Petitions Committee scheduled a Westminster Hall debate on a petition to ban ivory for 6 February 2017. In the debate, Thérèse Coffey reiterated the Government’s aim of “ending poaching and saving elephants”.<sup>42</sup> To achieve this aim, Dr Coffey stated that the Government was committed to introducing the “most effective ban possible” on ivory.<sup>43</sup>

Discussing ivory found in antiques, Dr Coffey called on Members to contribute to the Government’s consultation on a ban on modern sales so that the Government could “make progress on this matter”.<sup>44</sup>

The Government’s announcement to ban the modern sales of ivory was welcomed by conservation organisations, but also met with criticism that the proposals did not go far enough. For example, the conservation organisation

<sup>39</sup> Department for Environment, Food and Rural Affairs, ‘[UK Ban on Modern Day Ivory Sales](#)’, 21 September 2016.

<sup>40</sup> *ibid.*

<sup>41</sup> *ibid.*

<sup>42</sup> [HC Hansard, 6 February 2017, col 47WH.](#)

<sup>43</sup> *ibid.*

<sup>44</sup> *ibid.*, col 48WH.

Tusk said by focusing on modern day ivory, the Government had “overlooked” worked ivory which dated prior to 1947, which makes up the “vast majority” of the market.<sup>45</sup> Similarly, Save the Elephants argued that as long as a domestic ivory trade was allowed to continue, illegal ivory would “find its way on to the market”, meaning that “the scourge of poaching will continue”.<sup>46</sup> As a result, both organisations called for a total ban on ivory, arguing that making the trade in ivory illegal would reduce global demand and thus dis-incentivise poaching.

On 6 October 2017, the Government announced proposals to ban all ivory sales in the UK. In its consultation, the Government stated that the ban would seek to go “significantly further” than the ban on international commercial trade in ivory under CITES.<sup>47</sup> The ban would include prohibiting the import and export of ivory for sale to and from the UK. The Government stated that the term ‘sale’ would cover the sale, offer of sale, purchase, offer to purchase, keeping for sale and transporting for sale. A ban on imports and exports for sale would also cover intra-EU trade both to and from the UK.<sup>48</sup>

The Government argue that a ban on ivory sales would help bring an end to the poaching of elephants by “removing opportunities” for criminals to trade illegally-poached ivory.<sup>49</sup> According to the Secretary of State for the Environment, Food and Rural Affairs, Michael Gove:

The need for radical and robust action to protect one of the world’s most iconic and treasured species is beyond dispute. Ivory should never be seen as a commodity for financial gain or a status symbol—so we want to ban its sale. These plans will put the UK front and centre of global efforts to end the insidious trade in ivory.<sup>50</sup>

However, there are four categories of exemption to the proposed ban, which the Government contends will need to be “strictly defined and enforced to prevent exploitation”.<sup>51</sup> These include allowing the continued sale of:

- Musical instruments which contain ivory.
- Items which contain a small percentage of ivory, and where the ivory is integral to the item.

<sup>45</sup> [HC Hansard, 6 February 2017, col 48WH.](#)

<sup>46</sup> Save the Elephants, ‘[Conservationists and MPs Call for a Total UK Ban on Ivory Sales](#)’, 22 September 2016.

<sup>47</sup> Department for Environment, Food and Rural Affairs, [Banning UK Sales of Ivory](#), October 2017, p 8.

<sup>48</sup> *ibid.*

<sup>49</sup> Department for Environment, Food and Rural Affairs, ‘[Government Sets Out Plans for Ivory Ban](#)’, 6 October 2017.

<sup>50</sup> *ibid.*

<sup>51</sup> Department for Environment, Food and Rural Affairs, [Banning UK Sales of Ivory](#), October 2017, p 11.

- Items which are of significant artistic, cultural and historic value.
- Ivory to museums, and between museums.<sup>52</sup>

The proposals would extend to England, Scotland, Wales and Northern Ireland. A consultation on the proposals runs for twelve weeks, closing on 29 December 2017.

The announcement by the Government was welcomed by several conservation organisations who contend that a total ban would impact the illegal ivory trade, which has entered legal ivory markets. According to the World Wildlife Fund’s Chief Executive Officer, Tanya Steele, the Government’s proposals “show the UK wants to continue to be a leader in the fight to end the large-scale poaching of elephants”.<sup>53</sup> However, Ms Steele stated that for the Government to maintain its role as a global leader on ending the illegal wildlife trade, a total ban on ivory must be confirmed within the next twelve months.<sup>54</sup> In addition, Tusk described the proposals as a “welcome step” towards implementing the Government’s commitment to closing the UK ivory market.<sup>55</sup>

However, the proposals have also been met with criticism from those in the antiques industry who argue that it would impact their work. Mark Dodsgon, secretary general of the British Antique Dealers’ Association, criticised a total ban on ivory, including antiques, questioning whether “destroying or stopping the trade in our cultural heritage” was going to save any African elephants.<sup>56</sup> In addition, the historian, David Starkey has criticised a total ban, stating that to cease trading in ivory antiquities would be an act of “cultural vandalism”.<sup>57</sup> Mr Starkey contended that a ban on sales of ivory in antiquities would mean that such goods would cease to be tradeable, which would result in them losing value and “end up being destroyed”.<sup>58</sup>

## 5. Further Reading

- House of Commons Library, [Trade in Ivory: UK and International Policy and Regulation](#), 9 November 2017
- House of Commons Library, [Domestic Ivory Market in the UK](#), 31 January 2017
- House of Commons Library, [The UK Ivory Trade](#), 6 December 2016

<sup>52</sup> Department for Environment, Food and Rural Affairs, [Banning UK Sales of Ivory](#), October 2017, p 11.

<sup>53</sup> World Wildlife Fund, [WWF Welcomes the UK Government’s Announcement of a Public Consultation on Plans to End the Elephant Ivory Trade](#), 6 October 2017.

<sup>54</sup> *ibid.*

<sup>55</sup> Tusk, [Tusk and Other NGOs Welcome UK Government Consultation to Close Ivory Market](#), 6 October 2017.

<sup>56</sup> Nicola Davidson, [Cultural History or Cruel Complicity? Why Ivory Antiques are Controversial](#), CNN, 13 April 2017.

<sup>57</sup> Anita Singh, [British Museum Takes on Duke of Cambridge Over Ban on Ivory Trading](#), *Telegraph* (£), 15 February 2017.

<sup>58</sup> *ibid.*