Examining options for possible restrictions on ivory trade in and from the EU – Summary of EU Member States responses to the European Commission questionnaire

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A TRAFFIC Report prepared for the European Commission
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1. Introduction
The African Elephant *Loxodonta africana* and the Asian Elephant *Elephas maximus* are included in the Appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The EU regulates trade in elephant ivory through the provisions of the EU Wildlife Trade Regulations, which implement CITES in the EU, specifically under Council Regulation (EC) No. 338/97 and Commission Regulation (EC) No. 865/2006. Trade in elephant ivory for commercial purposes within, to or from the EU is generally not permitted, however under certain prescribed conditions, intra-EU trade and re-export of ivory for commercial purposes is allowed.

In the EU, the re-export of ivory for commercial purposes can only be authorized for:
- pre-Convention ivory (specimens acquired before the date on which CITES became applicable to them, i.e. 26th February 1976 for African Elephants and 1st July 1975 for Asian Elephants).

Intra-EU trade of ivory for commercial purposes is only permitted for:
- pre-Convention ivory (specimens imported into the EU before the elephant species was listed in Appendix I of CITES, i.e. 18th January 1990 for African Elephant and 1st July 1975 for Asian Elephant); in such cases, trade has to be authorized by an EU certificate, except for worked specimens acquired before 3rd March 1947 for which trade falls under the antiques derogation (hereafter referred to as “antiques”) and can occur without an EU certificate.

Recent years have seen very high levels of poaching of elephants for their ivory, along with significant increase in illegal trade – especially of large-scale ivory shipments – driven by demand in Asian markets. In response to these phenomena, the international community has made a number of commitments. Most recently, the 17th meeting of the Conference of the Parties to CITES adopted CITES Resolution Conf. 10.10 (rev CoP17) on trade in elephant specimens, which recommends that “all Parties and non-Parties in whose jurisdiction there is a legal domestic market for ivory that is contributing to poaching or illegal trade, take all necessary legislative, regulatory and enforcement measures to close their domestic markets for commercial trade in raw and worked (i.e. not raw) ivory as a matter of urgency” while recognizing that “narrow exemptions to this closure for some items may be warranted; any exemptions should not contribute to poaching or illegal trade”.

The Commission Communication and the Council Conclusions on an EU Action Plan against Wildlife Trafficking foresaw further limiting trade in ivory within and from the EU (Communication, Action 2). Accordingly, on 17th May 2017, the European Commission published new guidance recommending that EU Member States suspend the (re)export of raw ivory items and ensure a strict interpretation of the provisions in EU law authorizing intra-EU trade in ivory and the (re)export of worked ivory. According to the guidance document “through the ... guidelines, the EU will contribute to reduce ... demand and support the efforts by important destination markets for wildlife products, such as mainland China which adopted in 2016 specific measures to restrict the import of ivory items in its territory and has announced that it will phase out its domestic ivory market by the end of 2017”.

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2. According to the Elephant Trade Information System, a large-scale ivory shipment is >500 kg.
In addition to the adoption of the guidance document, the February 2017 meeting of the expert group of CITES Management Authorities of the EU Member States agreed that the rationale for and possibility of adopting additional stricter domestic measures at EU level on re-export and intra-EU trade of ivory should be explored. As a result, a questionnaire has been compiled and sent to EU Member States in April 2017 with the aim of obtaining further information about the EU ivory trade as a first step in a consultation process. The EU Member State responses to this questionnaire have been summarized and compiled in the present document along with other available information to inform further decisions on this issue.
2. Methodology

CITES trade data (import and re-export)

Import and export/re-export data was extracted from the UNEP-WCMC\(^3\) CITES trade database in May 2017 for the period 2012-2015 inclusive. Data for Elephantidae spp., *Elephas* spp. (Asian Elephant) and *Loxodonta* spp. (African Elephant) were extracted for the 28 EU Member States. Reported data from both importing and exporting Parties were considered however in general data reported by EU Member States were used (i.e. exporters’ data when considering re-exports, importers’ data when considering imports). As the dataset included all elephant products and not just ivory, the non-ivory items were removed to leave records with the following terms:

- **Raw ivory**: reported as “ivory pieces” (IVP), “ivory scraps” (IVS), “tusks” (TUS)
- **Worked ivory**: reported as “ivory carvings” (IVC), “carvings” (CAR), “jewellery” (JWL, IJW) and “piano keys” (PKY, KEY)
- **Hunting trophies**: reported as “hunting trophies” (TRO)

According to the CITES guidelines, carved tusks should be reported as “tusks” (TUS), however there is no way of distinguishing between whole raw elephant tusks and carved tusks, so for this analysis we have considered all TUS as raw ivory (except for internal EU trade, where this information was more widely available, see further below).

Due to the different units used for reporting ivory it is very difficult to estimate total quantities in trade. Therefore, the analysis presents the total number of records (to provide an indication of overall trade comparable between years), the number of specimens reported in trade (those records reported with a “blank” unit) and the specimens reported in mass (kilogrammes\(^4\)). A single re-export record of 1 m\(^3\) was not included in the analysis as it is not possible to infer actual number of items or mass.

Worked ivory items incorporate a wide range of different items. For example, items vary greatly in size ranging from small figures less than 5 cm to large figures greater than 20 cm. Items can be mounted and the mount may or may not be included in the reported mass or the ivory could be one small component of an item, for example a bronze figure with an ivory head or furniture with ivory inlay. These characteristics of the worked ivory data make it difficult to gauge the true volume/amount of trade in worked specimens.

Furthermore, discrepancies in the recording of piano keys in the CITES trade database should be noted and considered when looking at the EU’s total imports and re-exports of ivory between 2012 and 2016. At present, piano keys are recorded either as “carvings”, “ivory carvings” or “piano keys” in the CITES trade database. Some Member States report trade in a single item (i.e. a single piano), but others record total number of piano keys (i.e. 50–52 carvings), or the piano or its keys by weight. Furthermore, there appear to be differences in reporting between years and how the data reported by Member States have been interpreted by UNEP-WCMC prior to inclusion in the database. It is also noted here that the CITES Trade Database held a record by Belgium of a piano with ivory keys, reported as weighing 350 kg in total, which for the purposes of the present analysis was converted to one specimen of carving. (Further information on trade data reporting issues are provided in Annex E.)

In addition, the 28 EU Member States provided data from 2016, which were not available on the UNEP-WCMC CITES Trade database at the time of the data extraction, directly to the European Commission

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\(^3\) United Nations Environment Programme World Conservation Monitoring Centre.

\(^4\) Converted to kg where reported in grams.
via a questionnaire. The information presented in this document are based on the combination of CITES trade data for 2012–2015 and the additional data for 2016 provided by EU Member States in the questionnaire (where provided).

The figures and discussion focus on trade reported with any purpose code and all source codes except for I (seized specimens). Where trade was reported as O/U or O/W, it was treated as O (pre-Convention).

**Questionnaire responses**

As a way of obtaining additional information, a comprehensive questionnaire was sent to all 28 EU Member States requesting information on the details of imports, re-exports, intra-EU trade, illegal seizures and on possible future restrictions. A total of 24 EU Member States (Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Germany, Greece, Finland, France, Hungary, Ireland, Italy, Latvia, the Netherlands, Poland, Romania, Slovenia, Slovakia, Sweden, Spain, and the United Kingdom [UK]) provided responses. These responses are summarised throughout the report and hope to provide as a useful overview of the state of play of the EU’s legal and illegal ivory trade. It is however noted that the level of detail provided by Member States in their responses varies.

**Intra-EU trade**

Data on intra-EU trade between 2012 and 2016 were extracted from Member State responses to the ivory questionnaire.

For intra-EU trade of antique ivory only three Member States (Greece, Italy and Netherlands) reported data. Six Member States (Cyprus, Estonia, Ireland, Latvia, Slovenia and Slovakia) reported no trade. All other Member States provided comments, gave no response or the data was unavailable as trade certificates are not required for antiques.

For intra-EU trade of pre-Convention (post-1947) worked ivory ten Member States (Austria, Cyprus, Czech Republic, Denmark, Spain, France, Italy, Netherlands, Poland and Slovenia) reported data. Five Member States (Bulgaria, Finland, Ireland, Latvia and Slovakia) reported no trade. All other Member States gave no response or data was unavailable.

For intra-EU trade of pre-Convention (post-1947) raw ivory 15 Member States (Austria, Croatia, Cyprus, Czech Republic, Denmark, Germany, Greece, Finland, France, Ireland, Italy, Netherlands, Poland, Slovenia and Spain) reported data. Five Member States (Estonia, Hungary, Latvia, Slovakia and Sweden) reported no trade. All other Member States gave no response or data was unavailable. As noted above, carved tusks should be reported as “tusks” (TUS) in the CITES trade database, however there is no way of distinguishing between whole raw elephant tusks and carved tusks. Therefore, for the analysis of the EU’s re-exports and imports of ivory, all TUS have been considered as raw ivory. However, data on intra-EU ivory trade were extracted from Member State responses to the questionnaire where detailed information on the types of elephant tusks (i.e. carved or raw) were provided. Therefore, for the analysis of intra-EU trade, raw ivory only considers raw elephant tusks and ivory pieces.
Illegal Trade

To quantify the EU’s involvement in illegal ivory trade, quantitative analysis of EU ivory seizures (involving ivory carvings, ivory pieces and elephant tusks) between 2014 and 2016\textsuperscript{5} was conducted based on reports of significant seizures submitted by EU Member States to the European Commission. During this period, 15 of the 28 EU Member States (Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, the Netherlands, Portugal, Romania, Spain, Sweden and the UK) reported significant seizure records involving elephant ivory.

When reviewing the information, it should be noted that not all EU Member States submit these reports for analysis and that those submitting reports do not do so for all years, and that at present there is no common definition of what constitutes a “significant seizure”. The information from the significant seizures reports has been complemented by information in the questionnaire responses.

\textsuperscript{5} Data for the years 2012 and 2013 were unavailable for analysis.
3. Re-exports of worked ivory from the EU

Methodology

Previous data analyses have shown that the number of worked ivory items re-exported from the EU has increased in recent years, with data reported by EU Member States showing a marked increase since 2012. The focus of the present analysis was using export/re-export data extracted from the UNEP-WCMC CITES trade database in May 2017 for the period 2012–2015 inclusive (please see previous section on methodology for full details and difficulties taken into consideration when interpreting this trade data). In this analysis, trade reported with numbers of between 49 and 52 or between 98 and 104 items were assumed to be pianos, and converted to one or two items, respectively. A record of “1 set of bagpipes with 20 ivory mounts” was also treated as a single item. In addition, the 28 EU Member States provided data from 2016, which was not available on the UNEP-WCMC CITES Trade database at the time of the data extraction, directly to the European Commission via a questionnaire. It should be noted that some EU Member States provided data on both number of specimens and volume for some individual re-exports. It was only possible to consider one of these units at a time to avoid duplication of the same specimens. As the majority of exports were generally reported by number of specimens, therefore, where both were given, the figures only consider number of specimens (although the volume is referred to in the text analysis).

A total of 17 EU Member States (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Germany, Greece, France, Hungary, Ireland, Italy, the Netherlands, Poland, Sweden, and Spain) provided responses to questions concerning re-exports of worked elephant ivory including details of the specimen types, the proportion of antique and pre-Convention items, whether any increases or decreases in re-export levels or changes in purpose codes have been observed, as well as any information on rejected applications for re-export certificates. The level of detail provided varied across the Member States. The UK and Italy did not provide detailed information within this section of the questionnaire.

Number of records and number of specimens reported in trade

No notable trends were observed in the reported number of items or records of worked ivory re-exported by the 28 EU Member States to the rest of the World between 2012 and 2016.

Previous data analyses by TRAFFIC looking at commercial re-exports of ivory found that during the period 2006 to 2011, the average quantity of worked specimens reported as re-exported from the EU was ca. 4900 specimens per annum (increasing from 2781 specimens in 2006 to 10 286 specimens in 2011), while re-exports reported in mass were only ca. 27 kg per year on average during this period (increasing from 3 kg in 2006 to 100 kg in 2011).

The more recent years, 2012 to 2016, saw an increase in the average quantity of commercial re-exports of worked ivory specimens from the EU (as reported by the EU) reaching ca. 7500 specimens per year on average (2016 seeing the lowest number, 4703 – although data for that year are still

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6 United Nations Environment Programme World Conservation Monitoring Centre.
7 These figures represent the minimum and maximum number of piano keys on one piano.
8 These figures represent the minimum and maximum number of piano keys on two pianos.
9 This conversion had the greatest impact on exports from the UK, reducing the country’s total exports from 31 385 specimens to 28 908 specimens. It had no impact on the overall trends observed.
incomplete, with 2015 seeing the highest number at ca. 11 000 specimens), while the EU re-exports reported in mass were ca. 121 kg per year on average.

In 2012, more worked ivory reported by mass was exported than in any subsequent reporting year.

![Figure 1: Re-exports of worked ivory from the 28 EU Member States for the period 2012–2016 as reported by exporters](Source: CITES trade database (data for 2016 provided by EU Member States in the questionnaire (where provided).

The main reported purpose codes were Commercial (ca. 37 340 specimens, or 86% of trade), Personal (ca. 4730 specimens, or 11% of trade) and Travelling exhibition (ca. 1330 specimens, or 3% of trade) (Figure 2). Additionally, 70 specimens were reported as Educational, 22 as Scientific, and five specimens were reported without a purpose code. No notable changes were observed in reported purpose codes at the EU level over the period 2012 to 2016.

In the questionnaire responses, Germany and the Netherlands, reported a decrease in the proportion of worked ivory specimens re-exported for commercial purposes between 2012 and 2016. In Germany, commercial trade decreased from 75% in 2012 to 62% in 2016, whereas personal trade went from 17% in 2012 to 36% in 2016. France reported that number of re-exports for both raw and worked ivory specimens for personal purposes remained the same between 2012 and 2016, whilst re-exports for both raw and worked ivory specimens for commercial purposes peaked in 2014 (648 blocks) and then decreased between 2014 and 2016 (131 blocks) to below the level seen in 2012 (293 blocks).

Several EU Member States have put in place stricter domestic measures; for example, worked ivory is only re-exported for personal use, education or scientific use from the Czech Republic and Austria. Furthermore, the Netherlands banned re-exports of raw and worked ivory (except antique ivory) in 2015 for commercial purposes.
Figure 2: Relative reporting of Purposes of trade for re-exports of worked ivory from the 28 EU Member States for the period 2012–2016 as reported by exporters (main purposes only). Source: CITES trade database (data for 2016 provided by EU Member States in the questionnaire (where provided)).

Main re-exporters of worked ivory from the EU

The main exporters of worked ivory from the 28 EU Member States during the years 2012 to 2016 were the UK, Italy, France, and Germany (Figure 3). The UK was the principal exporter in terms of number of specimens (ca. 66% of all specimens). The main exporters as reported by mass were Belgium (ca. 52% of all re-exports) and the Netherlands (41% of all re-exports). Country-by-country comparisons should be used with caution due to the discrepancies in reporting trade outlined in the methodology section.

In the questionnaire responses, the main re-exporting Member States (UK, Italy, France and Germany) all stated that they have observed a decrease in the overall number of ivory specimens re-exported between 2012 and 2016. France reported a decline between 2012 and 2016 from 353 to 239 records, however they saw a peak in all product types in 2014 and the UK saw a slight increase in 2016.

Other Member States (Austria, Denmark, and Spain) also observed a decrease in 2016 which they believed was related to mainland China’s recent trade restrictions. Spain also reported an increase in the number of private individuals applying for EU certificates for sale of pre-Convention ivory to auction houses.
The majority of re-exports of worked ivory reported by the UK during the years 2012 to 2016 were re-exported for commercial purposes, both in terms of number of specimens (ca. 86% of re-exports) and by mass (ca. 94% of re-exports). Between the years 2012 and 2016 there appeared to be a decline in trade for personal purposes; similarly, more re-exports for commercial purposes were also reported in 2012 and 2013 than in subsequent years (Figure 4). The main destination countries/territories for worked ivory re-exported by the UK between 2012 and 2016 were mainland China (12 993 specimens), the USA (6360 specimens) and Mexico (3496 specimens).

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10 Figure depicts the five-main re-exporting EU MS according to the number of reported items exported; and the two-main re-exporting EU MS according to the reported mass exported.
Figure 4: Purpose of re-exports of worked ivory reported by the UK 2012–2016 (trade reported by number of specimens, and main purpose codes only). Source: CITES trade database

The majority of re-exports from Belgium of worked ivory reported by mass during the years 2012 to 2016 were exported for commercial (ca. 87% of re-exports). Only small quantities of worked ivory were reported by number by Belgium (87 items in total for all purpose codes, 2012–2016).

The main importing territory of worked ivory re-exported by Belgium between 2012 and 2016 was HK SAR (ca. 181 kg). This was also reflected in the questionnaire; in 2012 Belgium reportedly re-exported 30.8 kg and 26 specimens HK SAR. In 2015, Belgium noted an increase in re-exports, reporting two large re-exports of 124 figures, ca. 159 kg, in 2015 and 33 figures (and carved tusks), ca. 141 kg, in 2016 from Belgium to HK SAR.

Main importers of worked ivory re-exported from the EU

When considering numbers of specimens, the main destination countries/territories for worked ivory from the 28 EU Member States during the years 2012 to 2016 were mainland China and the USA (Figure 5). Other significant importers were Mexico, Australia, Switzerland, Japan and Norway. According to figures reported by re-exporters, mainland China imported ca. 51% of all reported specimens; whereas the USA imported ca. 16% of all reported specimens from the 28 EU Member States. Hong Kong, SAR was the most important importer of worked ivory from the 28 EU Member States by mass (ca. 181 kg); however, HK SAR was not a major importer by number of specimens.

Figure 5: The main importers of worked ivory re-exported from the 28 EU Member States for the period 2012–2016 as reported by exporters. Source: CITES trade database (data for 2016 provided by EU Member States in the questionnaire (where provided).

Mainland China was the principal destination for worked ivory from the 28 EU Member States as reported for the years 2012 to 2016. A total of ca. 21 580 items were re-exported to mainland China during this period, ca. 97% of which were re-exported for commercial purposes.
Additional items were reported to have been exported to the following administrative divisions outside mainland China during the same period: Taiwan (126 items), HK SAR (126 items) and Macao (3 items). As reported by mass, these regions accounted for a greater proportion of the trade, particularly in 2015, when ca. 159 kg of worked ivory was re-exported from the 28 EU Member States to these regions, compared to ca. 30 kg re-exported to mainland China.

The two main EU countries reporting re-exports of worked ivory to mainland China during the period 2012 to 2016 were the UK (12,993 specimens) and Italy (7,688 specimens). The UK also reported the greatest number of re-exports to other regions of mainland China (125 specimens).

Reports of re-exports to mainland China, by number of specimens, according to the 28 EU Member States, peaked in 2015, during which year 7,621 ivory carvings re-exported by Italy for commercial purposes accounted for ca. 83% of specimens of worked ivory re-exported from the 28 EU Member States to mainland China (Figure 6). No notable changes in purpose codes, re-exporting countries or volumes of trade were observed during the years 2012 to 2016.

![Figure 6](image_url)

**Figure 6:** Worked ivory re-exported to mainland China from the 28 EU Member States for the period 2012–2016 as reported by exporters. Note: “China” refers to mainland China, while China (other) refers to Taiwan, HK SAR and Macau. Source: CITES trade database

The 28 EU Member States reported ca. 7,090 re-exports of worked ivory to the USA during the period 2012–2016. Ca. 91% of trade occurred in the years 2012-2013, with a large and sustained decrease in reported trade between 2014 and 2016, both for specimens reported by number and by mass.

Ca. 75% of trade was reported as being for commercial purposes; the next most used purpose code was personal, at ca. 20%. No notable changes were observed in purpose codes reported during the years 2012 to 2016.

An apparent shift in trade route occurred in 2014, when reported trade to the USA declined and in the following two years’ trade to Mexico increased (Figure 7). This coincided with when the USA...
implemented stricter import provisions (in May 2014) further restricting imports of ivory\textsuperscript{11} and raises questions as to whether Mexico has genuinely become a destination for these ivory items or perhaps if it acts as a gateway for (some) ivory to illegally enter the USA.

The 28 EU Member States reported a total of 3575 exports to Mexico during the years 2012 to 2016. Ca. 99\% of trade to this country was reported in the years 2015 and 2016, with a large increase in reported trade between 2014 and 2015. Ca. 99\% of trade was reported as being for commercial purposes. No trade in worked ivory to Mexico from the 28 EU Member States was reported by mass during the years 2012 to 2016.

The main EU Member States reporting commercial re-exports of worked ivory to the USA during the years 2012 to 2016 were the UK (6360 specimens) and France (ca. 290 specimens). The UK also reported the most re-exports to Mexico (3496 specimens) of all the 28 EU Member States.

\textbf{Applications rejected}

Within the questionnaire, Member States were asked to provide information on the number of applications rejected. In total, EU re-export applications for both raw and worked ivory involving a total 230 specimens were rejected between 2012 and 2016 by eight Member States; France (64), UK (47), Hungary (43), Spain (43), Austria (16), Germany (10), Netherlands (4), and Sweden (3). Where reported to product level, there were 92 worked specimens (primarily dinner gongs\textsuperscript{12} and figures) and 68 raw tusks, and the purpose was mainly commercial (94) and personal (35).

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{figure7.png}
\caption{Worked ivory re-exported to the USA and Mexico from the 28 EU Member States for the period 2012–2016 as reported by exporters. \textit{Source: CITES trade database}}
\end{figure}

\textsuperscript{11} https://www.nrdc.org/sites/default/files/wil_15010601a.pdf
\textsuperscript{12} Since this questionnaire was conducted new guidance on Worked Specimens under the EU Wildlife Trade Regulations has been published in May 2017 which would classify dinner gongs as unworked specimens and a tusk or part of a tusk to qualify as worked must have been subject to significant carving or engraving over at
The top three destinations for the rejected applications were mainland China (101), HK SAR (19) and Thailand (11). The main reasons given for rejection were because items were not individually marked (43) (requirement for the re-export of elephant tusks only), stricter domestic measures (38), insufficient supporting information (33) or country of destination rejecting import permit (26). Several Member States mentioned that applicants frequently contact the authorities before applying to check the requirements and if they do not meet them refrain from applying.

Types of products in trade

According to the responses received in the questionnaire, the main type of worked ivory products reportedly re-exported by Member States were figures, musical instruments, personal items, household goods, jewellery, furniture and carved tusks (Table 1). Musical instruments included pianos, an organ, a guitar, bag pipes and violin bows. Personal items included knives, miniature paintings, fans, combs and walking canes and household goods include boxes, chess sets, cutlery, mirror, picture frame, and tea/coffee pot.

Table 1: Number of specimens reported for re-export by product type by Member State for period 2012–2016. Note: Italy and the UK did not provide any information on this. * France reported each product by the total number of permits issued, not by the number of specimens. Therefore, these are the minimum reported levels of worked ivory items re-exported by France between 2012 and 2016. Source: Questionnaire responses.

<table>
<thead>
<tr>
<th>Product Type</th>
<th>AT</th>
<th>BE</th>
<th>CZ</th>
<th>DE</th>
<th>DK</th>
<th>EL</th>
<th>ES</th>
<th>FR</th>
<th>HU</th>
<th>IE</th>
<th>NL</th>
<th>PL</th>
<th>SE</th>
<th>Total</th>
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<tr>
<td>Figures</td>
<td>52</td>
<td>3</td>
<td>400</td>
<td>9</td>
<td>83</td>
<td>891</td>
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<td>32</td>
<td>4</td>
<td>44</td>
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<tr>
<td>Musical instruments</td>
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<td>101</td>
<td>731</td>
<td>1</td>
<td>112</td>
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<td>1</td>
<td>14</td>
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<td>Personal items</td>
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<td>3</td>
<td>5</td>
<td>195</td>
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<td>4</td>
<td>10</td>
<td>5</td>
<td>310</td>
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<tr>
<td>Household goods</td>
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<td>136</td>
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<td>310</td>
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<tr>
<td>Jewellery</td>
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<td>30</td>
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<td>Carved Tusks</td>
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<td>38</td>
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<td>15</td>
<td>77</td>
<td>118</td>
<td>14</td>
<td>5</td>
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<td>74</td>
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<tr>
<td><strong>Grand Total</strong></td>
<td>93</td>
<td>48</td>
<td>5</td>
<td>120</td>
<td>1564</td>
<td>177</td>
<td>15</td>
<td>117</td>
<td>1606</td>
<td>21</td>
<td>13</td>
<td>125</td>
<td>60</td>
<td>48</td>
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</tbody>
</table>

Member States reported that the majority of these items were antique; of all Austria’s re-exports, only one item was not antique (a knife in 2014). The UK reported 98% were antique while France reported an average of 63% of items re-exported (raw and worked) were antique and that the trend had been quite stable between 2012 and 2016, aside from a peak in 2014 where it fell to 48%13. Overall, Germany reported over 80% of all items were antique aside from pianos and carved tusks14.

13 France reported each product by the total number of permits issued, not by the number of specimens. Therefore, these are the minimum reported levels of worked ivory items re-exported by France between 2012 and 2016.
14 Since this questionnaire was conducted new guidance on Worked Specimens under the EU Wildlife Trade Regulations has been published in May 2017 which defines for a tusk or part of a tusk to qualify as worked, the specimen must have been subject to significant carving or engraving over at least 90% of its surface: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ:C:2017:154:01.0015.01.ENG&toc=OJ:C:2017:154:TOC.
Of the reported pianos, 43% were antique and for carved tusks, 38% were antique. In total, 80% of Italy’s reported re-exports were antique.

Greece reported re-exporting antique museum specimens in all instances except one incense burner in 2014, and Spain noted that although some items were antique, there is an industry of ivory handicraft in Spain that is still producing pieces nowadays of post-1947 specimens.

Other interesting points to note:

- The Czech Republic reported one re-export of 15 samples (0.634 kg) which was sent for DNA analysis to the USA in 2015;
- Bulgaria reported that no re-exports took place between 2012 and 2016 but in 2016 applications for figures and carved tusks for re-export to the USA were submitted but not used.
4. Ivory imports into the EU

Methodology

The focus of the present analysis was using import data extracted from the UNEP-WCMC\textsuperscript{15} CITES trade database in May 2017 for the period 2012–2015 inclusive (please see previous section on methodology for full details and difficulties taken into consideration when interpreting this trade data). In this analysis, trade reported with numbers of between 49 and 52\textsuperscript{16} or between 98 and 104\textsuperscript{17} items were assumed to be pianos, and however it was not converted to one or two items, respectively as an analysis found the difference at the EU level was relatively small. In addition, the 28 EU Member States provided data from 2016, which was not available on the UNEP-WCMC CITES Trade database at the time of the data extraction, directly to TRAFFIC/the European Commission via a questionnaire.

A total of 22 EU Member States (Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Germany, Greece, Finland, France, Hungary, Ireland, Italy, Latvia, the Netherlands, Poland, Romania, Slovakia, Spain, Sweden, and the UK) provided responses to the questions concerning imports of raw and worked elephant ivory including questions on the quantity of ivory imported, details of the specimen types, whether any increases or decreases in import levels or changes in purpose codes have been observed, as well as any information on rejected applications for permits. The level of detail provided varied across the Member States. Poland provided data for 2016 only.

According to the CITES trade database, hunting trophies with elephant tusk can be recorded in a few different ways. These specimens can either be reported with the term “trophies” with purpose code “H” (hunting trophy) or “P” (personal), or as tusks “TUS” with purpose codes “H” (hunting trophy). Consequently, in the analysis below there are separate sections analysing the EU’s imports of raw ivory (including elephant tusks) and specifically hunting trophies.

Raw ivory

The number of tusks (reported as specimens) reported by importers declined from 240 tusks in 2012 to 133 in 2016 (Figure 9). Exporters’ reports, although generally higher than importers’ due to not all issued permits being used, also showed a decline. Tusks reported only by weight (kg) peaked at 137 kg in 2013 and declined to 42 kg in 2015. However, it should be noted that the data provided by EU Member State countries for 2016 included both number of specimens and weight for the same tusks in trade, but number of specimens was chosen for this analysis.

A total of 477 ivory pieces were imported into the EU between 2012 and 2016: imports also peaked in 2013 at 268 according to EU Member States, then showed a steady decline to two ivory pieces in 2016.

Exporters conversely reported an increase in the number of ivory piece exports to EU Member States: increasing from 446 specimens in 2012 to 895 specimens in 2015 (2016 data not available). Exporters reported exporting to the EU total of 2369 specimens of ivory pieces, plus an additional 7.8 kg reported as mass and not as number of specimens.

\textsuperscript{15} United Nations Environment Programme World Conservation Monitoring Centre.

\textsuperscript{16} These figures represent the minimum and maximum number of piano keys on one piano.

\textsuperscript{17} These figures represent the minimum and maximum number of piano keys on two pianos.
Figure 9 Imports (as reported by both importer and exporter) of raw ivory (tusks) into the 28 EU Member States for the period 2012–2016 according EU Member States and exporting Parties. Analysis does not include imports of ivory pieces. Contains all purpose and source codes, except for source code I. Exporter data are not available for 2016. NB. Imp: number of specimens and mass (kg) as reported by importer reported data; Exp: number of specimens and mass (kg) data reported by exporter reported data. Source: CITES Trade Database.

Worked ivory

EU Member States reported importing a total of 7983 ivory carvings\(^{18}\) and an additional 39 kg between 2012 and 2016 (Figure 10). This contrasts with the 6505 specimens and an additional 39 kg reported by exporting countries between 2012 and 2015 (data were not available for 2016)\(^ {19}\). Imports of (ivory) carvings reported as number of specimens increased between 2013 and 2015, but declined in 2016.

The only trade in piano keys during this period was reported in 2014 and 2015 by exporting countries (a total of 4308 specimens) which equates to ca. 83 pianos\(^{20}\).

\(^{18}\) Includes specimens reported as carvings and ivory carvings

\(^{19}\) It should be noted that some of the specimens reported as ivory carvings could be piano keys.

\(^{20}\) On the basis that one piano holds 52 piano keys.
Figure 10 Imports of worked elephant ivory (carvings, ivory carvings, piano keys) into the 28 EU Member States for the period 2012–2016 according EU Member States and exporting Parties. Does not include imports of carvings reported in kg. Contains all purpose and source codes. Exporter data are not available for 2016. *NB* Imp: number of specimens and mass (kg) as reported by importer reported data; Exp: number of specimens and mass (kg) data reported by exporter reported data. Source: CITES Trade Database.

**Trophies**

EU Member States reported importing a generally declining total number of trophies during the period: from a high of 244 in 2012 to 83 in 2016. Reports by exporters however showed a different pattern, with exports peaking at 158 in 2014 (Figure 11).

An analysis of the Appendix listing of imported hunting trophies (purpose code H) (all terms) reported as number of specimens indicates that according to EU Member States, generally more hunting trophies were of Appendix-II listed elephants than Appendix I (annual average of 147 specimens per year compared with 55 specimens) (Figure 12). Imports reported as kg followed a similar pattern (54 kg per year for Appendix II compared with 12 kg for Appendix I) (Figure 13).

In 2015, the EU introduced legislation requiring all hunting trophies for Appendix-II listed specimens to require an import permit. For the years 2012 to 2014, EU Member States reported importing a lower amount of hunting trophies reported as number of specimens than exporters (ranging from 47% to 70% of exporters reports). In 2015 this switched, and EU Member States reported nearly three (2.78) times the amount reported by exporters (it should be noted that not all exporting countries submitted their annual reports for 201521).

EU Member States reported importing far fewer trophies reported by kg than exporters (ranging from 3% to 6% of exporters totals between 2012 and 2014). In 2015, there were no reports by exporters but EU Member States reported importing 22 kg.

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21 Zimbabwe, South Africa, Tanzania, Mozambique, Botswana and Namibia were the top exporters of trophies to the EU. Of these, Zimbabwe, South Africa, Tanzania, Mozambique and Namibia have all submitted their annual reports for 2015, however Botswana has not submitted their report.
Figure 11: Imports of elephant specimens reported with the term “trophies” into the 28 EU Member States for the period 2012–2016 according EU Member States and exporting Parties. Contains all purpose and source codes. Exporter data are not available for 2016. NB. Imp: number of specimens and mass (kg) as reported by importer reported data; Exp: number of specimens and mass (kg) data reported by exporter reported data. Source: CITES Trade Database

Figure 12: Imports of elephant commodities (all terms) reported with the purpose code H (hunting trophy) into the 28 EU Member States for the period 2012–2016 according EU Member States and exporting Parties, where the unit was number of specimens. Contains all source codes. Exporter data are not available for 2016. NB. Imp: number of specimens and mass
Imports

Between 2012 and 2016, Germany imported the largest number of specimens of raw ivory (tusks and ivory pieces) (355 in total), followed by Poland (221 specimens) and Spain (173) (Figure 14). Several EU Member States which reported a relatively large amount of imports between 2012 and 2016 in total did not report importing any specimens in the later part of that period (e.g. Poland and Italy reported no imports after 2013, the Czech Republic reported no imports after 2014). The large quantity of specimens imported by Poland in 2013 were pre-Convention ivory pieces exported from Switzerland (156) and Norway (52) (see Figure 15 for an explanation regarding the high quantities of ivory pieces reportedly imported by Poland, from Switzerland and Norway). A total of 22 EU Member States reported importing raw ivory which equated to 1276 specimens and an additional 322 kg.

In contrast, the UK was the largest importer of worked ivory (carvings, ivory carvings, piano keys) reportedly importing 2910 specimens between 2012 and 2016 (mostly pre-Convention specimens, 2824). As with raw ivory, Poland was identified as the second largest importer of worked ivory (1416 specimens: all of which were pre-Convention out of which 622 specimens could have been piano keys making up 9 individual pianos (Figure 15). France was the third largest importer of worked ivory (1355 specimens). Whereas Germany was the largest importer of raw ivory, it was the fifth largest importer of worked ivory (591 specimens). 19 EU Member States reported importing worked ivory between 2012 and 2016 which totalled 7983 specimens and an additional 39 kg.
Spain reported importing the highest number of specimens using the term “trophies” (includes all purpose codes) (208 specimens), followed by France (206) and Denmark (56). A total of 761 specimens and an additional 1 kg were imported by EU Member States using the term “trophies” between 2012 and 2016 (Figure 16).

**Figure 14** Importers of raw ivory (tusks and ivory pieces) into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose and source codes. *Data source: CITES Trade Database.*

**Figure 15:** Importers of worked elephant ivory (carvings, ivory carvings, piano keys) into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose and source codes. *Note: It should be noted that several importer records reported as ivory carvings could have been piano keys, such as Poland’s imports of ivory pieces from Switzerland and Norway (see above).*
If all records involving specimens of 49 to 52 or 98 to 104 ivory carvings/carvings are converted to equal one/two pianos, respectively, EU importer data changes significantly for some countries; a total of 622 pre-Convention specimens reported by Poland could have comprised of 9 pianos; a total of 362 pre-Convention specimens reported by the UK could have been 7 pianos, and the 104 specimens reported by France, could have been 2 pianos (see section on piano keys vs. pianos, Figure 28). The same point is applicable for the Netherlands. Source: CITES Trade Database.

In the questionnaire, France, Germany and the UK reported a decline in the quantity of import records between 2012 and 2016. France stated the amount was 30% lower in 2016 than in 2012. Finland also observed a decrease for hunting trophies imported. However, the Netherlands and Sweden reported that the imports were stable during this period. Germany had one exceptional case in 2013 where they imported 359 small raw ivory pieces for scientific and law enforcement purposes following confiscation in Sri Lanka.

Exporters

EU Member States reported that the largest exporter of raw ivory (tusks and ivory pieces) to the EU between 2012 and 2016 was Zimbabwe (313 specimens and an additional 261 kg). Other large exporters that were also range States included Namibia, Botswana and South Africa, which along with Zimbabwe are the countries that have Appendix-II listed elephant populations, as well as Mozambique where populations are included in Appendix I (Figure 17). Non-range States were also significant exporters of specimens of raw ivory: including Switzerland (200 specimens), USA (163 specimens) and Norway (52 specimens). The majority of imports of raw ivory from Switzerland, the USA and Norway had the origin reported as unknown (“XX”). A total of 26 countries were reported as exporting 1276 specimens and 322 kg of raw ivory to the EU between 2012 and 2016.

Similarly, between 2012 and 2016 the largest reported exporters of specimens imported using the term “trophies” were range States: the largest number were exported from Zimbabwe (253 specimens), followed by South Africa (145 specimens) and Tanzania (103 specimens) (Figure 18).
Member States reported importing a total of 761 specimens and an additional 1 kg using the term “trophies” from 14 countries during this period.

The largest reported exporters of worked ivory (carvings, ivory carvings, piano keys) were non-range States: USA (1965 specimens), followed by Switzerland (1886 specimens) and Norway (929) (Figure 19). The majority of imports from the USA (1105) were imported in 2012, and imports from the USA were significantly lower in subsequent years. EU Member States reported importing a total of 7983 specimens plus an additional 39 kg from 54 countries/territories.

**Purpose codes**

**Raw Ivory**

Between 2012 and 2016, the majority of raw ivory (tusks and ivory pieces) imported into the EU was reported with the purpose code H (hunting trophy) according to EU Member States (a total of 642 specimens and an additional 302 kg) (Figure 20). All imports of raw ivory (excluding two ivory pieces) of source code H were of tusks: most of which were reported as from wild elephants (612 specimens and 302 kg).

There was also a significant number of specimens of raw ivory imported with the purpose code T (commercial purposes) (292 specimens): the majority of which were pre-Convention ivory pieces (270 specimens). The majority of these specimens were imported in 2013 from non-Range States and country of origin was unknown (“XX”) (248 specimens: 247 of which were ivory pieces).

Imports of raw ivory using purpose code H and T accounted for 73% of all raw ivory specimens imported into the EU, and 100% of raw ivory reported by weight (kg).

**Worked Ivory**

The majority of worked ivory (carvings, ivory carvings, piano keys) was imported for commercial purposes (4550 specimens) (source code T) (Figure 21). All but five of these specimens were pre-Convention specimens (see section 1 for further details on the definition of pre-Convention specimens). In 2016, 244 specimens were imported for commercial purposes which was markedly lower than previous years (annual average for 2012 to 2015 was 1077 specimens).

The number of specimens imported for personal use (source code P) increased from 2013 to 2015, but then showed a sharp decrease in 2016 (noting that 2016 data were incomplete).

An analysis of worked ivory imported by weight revealed that of a total of 39 kg, 31 kg were imported with the source code P (personal), all of which were imported by Slovakia in 2012 from Zimbabwe. The remaining 8 kg were imported for commercial or personal purposes.

**Trophies**

Between 2012 and 2016, the majority of specimens imported using the term “trophies” were reported as being hunting trophies (source code H) (526 specimens) or for personal use (source code P) (231 specimens) (Figure 22). The number of specimens imported with source code H decreased between 2012 and 2014, but then showed an increase in 2015, whereas imports using source code P (personal use) declined year on year between 2012 and 2016.
Figure 17: Exporters of raw ivory (tusks and ivory pieces) into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose and source codes. Source: CITES Trade Database.

Figure 18: Exporters of items imported using the term ‘trophies’ into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose and source codes. Source: CITES Trade Database.
Figure 19: Exporters of worked elephant ivory (carvings, ivory carvings, piano keys) into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose and source codes. Source: CITES Trade Database.

Figure 20: Reported purpose code of raw ivory (tusks and ivory pieces) imports into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all source codes. Source: CITES Trade Database.
Within the questionnaire, no trends have been reported as observed by Member States for a change in the reported purpose of imports except for France where commercial, hunting and personal imports are thought to be declining and travelling exhibition increasing. Austria, Belgium and Latvia reported they only see imports for hunting or personal purposes whereas in the Czech Republic imports are commercial only.
Estimating the number of tusks imported into the EU

To determine patterns of the importation of tusks into EU Member States, all imports reported using the term trophies were multiplied by two (based on a calculation that every specimen could likely have a maximum of two tusks). When combined with imports which were reported as tusks (all purpose and source codes), this gives a maximum estimated number of tusks. It should be stressed that this is the absolute maximum number of tusks: it is possible that some trophies have no tusks.

It appears that imports of estimated number of tusks are declining over the period (Figure 23). Based on the maximum possible number of tusks, it appears that exporters reported a higher number of specimens than importers from 2012 to 2014, but in 2015 this switched. Based on the estimates, the EU could have imported the equivalent of a maximum of 2321 tusks (compared with 2402 based on exporters’ reports for 2012 to 2015).

Figure 23: Estimated maximum number of tusks imported into the 28 EU Member States for the period 2012–2016 according EU Member States and exporting Parties (based on no. of tusks reported, and no. of trophies x 2). Contains all purpose and source codes. Exporter data are not available for 2016. NB. Imp: number of specimens and mass (kg) as reported by importer reported data; Exp: number of specimens and mass (kg) data reported by exporter reported data. Source: CITES Trade Database

Sources of ivory

Raw Ivory

Most imports of raw ivory (tusks and ivory pieces) were reported by EU Member States as being from wild elephants (753 specimens and an additional 322 kg) (Figure 24). As would be expected, all wild imports were reported as being exported, or originating from range States.

There was also a significant number of pre-Convention specimens of raw ivory imported into the EU (452 specimens): most of which were re-exported by non-range States with the origin specified as “unknown”.

28
Data for 2016 included specimens where the source had not been specified, but where the exporter was specified all were from range States (32 specimens), so it is likely that these are also from wild elephants.

**Worked Ivory**

The majority of worked ivory (carvings, ivory carvings, piano keys) imported into the EU between 2012 and 2016 was reported as being pre-Convention (7612 specimens) (Figure 25). EU Member States reported importing 184 wild specimens in 2015 for personal and travelling exhibition purposes: many of which were re-exported by non-Range States from an unknown origin (“XX”) (137 specimens).

An analysis of worked ivory imported by weight revealed that of a total of 39 kg: 31 kg was reportedly wild and all of which were imported by Slovakia in 2012 from Zimbabwe. The remaining 8 kg were reported as pre-Convention.

**Trophies**

Nearly all imports between 2012 and 2016 imported using the term “trophies” were reported as being of wild origin (711 specimens). The source of the remaining trophies was either not specified (45) or pre-Convention (5 specimens) (Figure 26).

![Figure 24: Reported source code of raw ivory (tusks and ivory pieces) imports into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose codes. Source: CITES Trade Database.](image-url)
Figure 25: Reported source code of worked elephant ivory (carvings, ivory carvings, piano keys) imports into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose codes. Source: CITES Trade Database.

Figure 26: Reported source code of items imported using the term ‘trophies’ into the 28 EU Member States for the period 2012–2016 according EU Member States. Only includes imports reported as number of specimens (not kg). Contains all purpose codes. Source: CITES Trade Database.

Number of transactions

An analysis was undertaken to calculate the number of rows in the CITES Trade Database output containing all data for this analysis, which could be used as a proxy for number of transactions. Data from 2016 were not included as the data were received in individual rows (whereas 2012 to 2015 data
from the CITES Trade Database would be combined when all fields (except quantity) were the same. It appears that the number of transactions overall is declining (Figure 27).

![Number of rows in the CITES Trade Database output conducted for the analysis of this report. Contains all purpose and source codes. Source: CITES Trade Database](image)

**Figure 27**

Piano keys vs. pianos

An analysis which considered reports of 49 to 52 or 98 to 104 ivory carvings/carvings/piano keys to be equal to one or two pianos respectively was conducted to determine whether this would influence overall patterns of imports (Figure 28). The total number of specimens of carvings/ivory carvings/piano keys were on average 12% lower when suitable reports were converted to one or two pianos. As the difference at the EU level was relatively small, the decision was made to perform all subsequent analysis using data as reported (i.e. without conversions).

According to importing countries, 825 ivory carvings/piano keys specimens were imported in quantities of 49 to 52 or 98 to 104 between 2012 and 2016. This was converted to 16 pianos. Importing countries reporting these ivory carvings were UK (362 converted to 7 pianos), Austria (156 converted to 3 pianos), France (104 converted to 2 pianos), Spain (101 converted to 2 pianos), Poland (52 converted to 1 piano) and Finland\(^\text{22}\) (50 converted to 1 piano).

According to exporting countries, 2182 carvings/ivory carvings/piano keys were imported in quantities of 49 to 52 or 98 to 104 between 2012 and 2016. This was converted to 42 pianos. Large exporters included Switzerland (780), USA (728), South Africa (312) and Norway (156).

\(^\text{22}\) According the Finnish CITES Management Authority, the 50 ivory carvings were not a piano, but a collection of small figures. This should be considered when examining Figure 28 (Finnish CITES MA, pers. comm. to EC, 2019).
Main product types

Within the questionnaire Member States provided information on the main product types imported into their country. Austria, Bulgaria, Croatia, Latvia, and Slovakia noted the main raw ivory products imported were tusks (as trophies). Belgium, Finland and Sweden also observed importing mainly tusks (hunting purpose or as part of household move) with a few worked items (antique pianos and carvings for personal use).

Worked ivory products imported were reported as mainly included figures, pianos, bag pipes with ivory mounts, chess sets, miniature paintings, furniture with ivory inlays, carved tusks, jewellery, cutlery, and other household goods or personal items and the majority were antique. France reported that on average between 2012 and 2016, 76% of their imports were worked specimens with the most frequent items being figures, boxes and furniture with ivory veneer. In 2016, imports of worked specimens rose to 90%. On average 68% of the worked items imported were antique, ranging from 49% in 2012 to 86% in 2016. Italy’s imports consisted of mainly antique carvings, furniture, boxes, caskets and guitar picks. Netherlands reported a wider range of antique items including pianos, small figures, furniture, personal items, household goods, chess sets and jewellery.

The Czech Republic, Greece, Hungary, Ireland and Poland reported the main products imported were a small number of worked items such as pianos (antique and pre-Convention), miniature paintings and small statues. Greece cited these were for museum exhibitions and Ireland only imported three antique items, all in 2016; one artwork painted on ivory (donation to National Gallery of Ireland), an ivory figurine and a Japanese Shibayama Vase (personal items).

Applications rejected

According to the questionnaire responses, import applications involving a total of 133 specimens were reported to have been rejected between 2012 and 2016 by six Member States; UK (63), France (47),...
Spain (17), Netherlands (3), Denmark (2) and Latvia (1). Where the information was provided, the majority were for carvings (personal items or musical instruments) (55), raw tusks (19) or hunting trophies (9) and the purpose was personal (33), commercial (27) or hunting (23). The top four exporting countries were South Africa (21), the USA (10) and Botswana (8)/Australia (8). The main reasons given for rejection were retrospective applications (25), insufficient or incorrect supporting information (31), invalid export permit (9) or items consisting of pre-Convention ivory (9).
5. Intra EU trade in elephant ivory 2012-2016

Information on trade trends within the EU for antique and pre-Convention raw and worked ivory was gathered from the questionnaire requesting information on the quantity of ivory in trade, number of rejected applications for EU certificates, details of the specimen types, reasons for trade and whether any increases or decreases have been observed.

The information below should be read noting that the data are based on partial information as only fifteen EU Member States provided data to this section of the questionnaire and some them with incomplete information (only reporting trade in pre-Convention raw, pre-Convention worked or antique ivory). Therefore, this analysis does not reflect the true quantities of internal EU trade. Estonia, Latvia and Slovakia reported no intra-EU trade of antique or pre-Convention ivory. For other Member States data was unavailable or no response was provided.

Intra-EU trade in antiques (pre-1947)

Since an EU certificate is not required for antique ivory traded within the EU, only three Member States provided information on the quantity and seven Member States made comment on the intra-EU trade of antique ivory. Six Member States (Cyprus, Estonia, Ireland, Latvia, Slovenia and Slovakia) reported no intra-EU antique trade.

- **Greece** reported one comb from 5th–6th century in 2012.
- **Italy** reported 13 specimens between 2012 and 2016, ten of which were traded in 2016. Piano keys, carvings, swords and rifles were the main product types. Italy also reported an increase in 2016, which was reportedly thought to be due to private individuals selling their specimens in an economic crisis or no longer wanting to own ivory.
- **Hungary** require a “verification of origin” document for trading antique ivory. The documents are required for antique and pre-Convention ivory items. A total of 13 owners have been registered for antique and pre-Convention specimens and 48 transactions were reported in 2016 which involved mainly figures and carvings for commercial trade.
- **France** provided estimates of an average of 25 000 antiques sold per year by auction houses in Auvergne-Rhone-Alps area and at least 60 000 per year in Paris area and believed part of these were for subsequent re-export to Asia.
- **Netherlands** reported receiving applications for an EU certificate for 58 specimens containing a mixture of jewellery, art and household goods (e.g. boxes, piano keys) between 2012 and 2016, with a peak of 34 in 2013. These applications were all rejected as because no EU certificate is required for such trade.
- **Spain** reported no information on the quantity but suggested that most antiques in trade are figures, household goods and personal items. An increase in trade has been observed, which is believed to be due to private individuals selling their specimens in the economic crisis.
- **Sweden** stated they believed the number of piano keys involved was increasing but otherwise there was no real change as auction houses are not very keen on selling ivory due to the difficulty of providing proof of legal origin.

Intra-EU trade of pre-Convention ivory (raw and worked)
Fifteen EU Member States (Austria, Croatia, Cyprus, Czech Republic, Denmark, Germany, Greece, Finland, France, Ireland, Italy, Netherlands, Poland, Slovenia, and Spain) reported intra-EU trade in pre-Convention raw (elephant tusks and ivory pieces) and worked ivory (ivory carvings) between 2012 and 2016, which involved a total of 52,824 kg and an additional 5,264 specimens (Table 2). Six Member States (Bulgaria, Estonia, Hungary, Latvia, Slovakia and Sweden) reported no intra-EU trade of pre-Convention ivory. All other Member States gave no response or data was unavailable.

Of note is that a total of ca. 35,036 kg of elephant tusks and an additional 1,440 specimens were traded internally within the EU between 2012 and 2016. In order to provide an insight into the total number of elephant tusks involved, the elephant tusks reported in kg were converted into number of tusks based on a range of 3.5 – 7.5 kg per tusk. Based on these figures, between ca. 4,670 and 10,000 elephant tusks (reported as kg) were traded within the EU between 2012 and 2016. Therefore, in total, the EU traded between ca. 6,110 and 11,440 elephant tusks between 2012 and 2016.

Table 2. Intra-EU pre-Convention trade as reported by total volume and additional number of specimens between 2012 and 2016, as reported by 16 EU Member States.

<table>
<thead>
<tr>
<th>Product</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Raw ivory</td>
<td>42,234</td>
<td>1,506</td>
</tr>
<tr>
<td>Worked ivory</td>
<td>10,590</td>
<td>3,758</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>52,824</strong></td>
<td><strong>5,264</strong></td>
</tr>
</tbody>
</table>

23 Croatia, Germany, Greece, Finland, and Ireland only provided data for pre-Convention raw ivory. Finland and Ireland reported no intra-EU trade in pre-Convention worked ivory. For Croatia, Greece and Germany data was unavailable. Germany reported that it was not possible to consult with the local or regional CITES Management Authorities in charge of issuing EU certificates for commercial use of worked ivory for the 16 federal States of Germany in the timeframe available and therefore no data were provided. Bulgaria reported no intra-EU trade for pre-Convention worked ivory, Hungary and Sweden reported no intra-EU trade for pre-Convention raw ivory. Data was unavailable for other categories.

24 Bulgaria reported no intra-EU trade for pre-Convention worked ivory, Hungary and Sweden reported no intra-EU trade for pre-Convention raw ivory. Data was unavailable for other categories.

Over the years, the quantity of ivory traded for commercial purposes (i.e. with an EU certificate) within the EU (reported in both volume and additional number of specimens) generally decreased, with 2016 seeing the lowest reported levels of intra-EU trade (Figure 29).

![Figure 29](image_url)

**Figure 29.** Total volume and additional number of specimens of pre-Convention raw and worked ivory traded internally within the EU between 2012–2016. AT, BE, CY, CZ, DK, DE, EL, ES, FI, FR, HR, IE, IT, NL, PL and SI reported intra-EU trade in worked and/or raw ivory. BG, HU, LV, RO, and SK reported that no internal trade had occurred between 2012 and 2016. NB. *Source: CITES Trade database*

Spain and France were the main countries involved in intra-EU trade of both pre-Convention raw and worked elephant ivory between 2012 and 2016, reporting ca. 97% of trade in worked specimens and ca. 72% for raw ivory (based on mass [kg]) (Figure 30). For raw ivory, both Spain and France only traded in elephant tusks, and reported significantly higher levels of trade compared to worked specimens. However, it should be noted that in May 2016 the French CITES Management Authorities were instructed that EU certificates for raw ivory would no longer be issued, and in August 2016, a Ministerial Decree was published that prohibited the trade in ivory in French territories.

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26 Hungary provided information on the number of intra-EU transactions, not on the specific number of specimens traded.
In terms of the additional number of specimens reported by EU Member States, Italy, Spain, Denmark, and Belgium were the main countries reporting intra-EU trade in both pre-Convention worked and raw ivory (Table 3). For worked specimens, the intra-EU trade from Italy was significantly higher than any other EU Member State, accounting for ca. 72% of all trade (Table 2). However, over the years, trade levels have gradually decreased, from 898 specimens in 2012 to 188 specimens in 2016, respectively.

Table 3. Additional number of specimens reported for intra-EU trade of pre-Convention raw and worked ivory between 2012–2016, as reported by EU Member States. *Others include: Austria, Cyprus, France, Greece, Netherlands, Poland and Slovenia.

<table>
<thead>
<tr>
<th>Member State</th>
<th>Worked ivory</th>
<th>Raw ivory</th>
</tr>
</thead>
<tbody>
<tr>
<td>Belgium</td>
<td>237</td>
<td>765</td>
</tr>
<tr>
<td>Denmark</td>
<td>241</td>
<td>32</td>
</tr>
<tr>
<td>Italy</td>
<td>2717</td>
<td>373</td>
</tr>
<tr>
<td>Spain</td>
<td>530</td>
<td>230</td>
</tr>
<tr>
<td>Others*</td>
<td>33</td>
<td>106</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3758</td>
<td>1506</td>
</tr>
</tbody>
</table>

In total, intra-EU applications involving a total of 1680 specimens (raw and worked ivory) were reported to have been rejected between 2012 and 2016 by nine Member States; France (1515), UK (65), Denmark (44), Spain (21), Netherlands (19), Sweden (11), Hungary (2), Bulgaria (2), and Belgium (1) (Figure 31). The majority of responses did not specify whether the rejected applications involved raw or worked ivory. Where this was reported, the majority were for worked ivory products (127) followed by tusks (35) and the main reason given was insufficient supporting information (54) or no proof of origin or acquisition (19). Several Member States mentioned that applicants frequently contact the authorities before applying to check the requirements and if they do not meet them...
refrain from applying. The high number of rejected items in France in 2016 is likely due to their stricter internal policy/regulations (as mentioned above).

![Figure 31. Number of specimens rejected for intra-EU trade between 2012–2016 as reported by nine EU Member States. Source: Questionnaire responses](image)

**Pre-Convention worked ivory (post-1947)**

**Types of products in trade**

The main types of pre-Convention worked ivory items traded internally within the EU involved figures (ca. 6870 kg and an additional 298 specimens) and carved tusks (ca. 2512 kg and an additional 101 specimens). Other items included walking sticks, chess sets, cutlery with ivory handles and jewellery, items such as bracelets and earrings, together accounting for ca. 6 kg and an additional 140 specimens.

**Purposes of trade**

Belgium and France noted their historical links with African countries and “ivory culture” which, over the years, resulted in individuals and museums accumulating significant ivory collections. However, the majority of these individuals are no longer interested in retaining these items and wish to sell them on for profit. Belgium noted that many of their citizens strongly believe that the market value of ivory is similar to that of gold.

Only Cyprus observed that internal trade of pre-Convention worked ivory items were to remain within the EU, however it should be noted that some Member States were unable to answer this question due to a lack of information. Belgium and France noted that they believe worked ivory items are often purchased within the EU for the purpose of re-export. For example, France noticed that some purchases of ivory prior to 2015 led to applications for French re-export permits and it is likely that since France implemented stricter restrictions in January 2015 some re-exports may go through other Member States instead. Furthermore, Belgium noted that during 1984 and 1989 there were significant amounts of legal ivory imported from mainland China and HK SAR to Belgium which was then purchased by Belgian citizens from specialist shops. Due to a lack of interest in ivory or a desire for
profit, these specimens are now being re-exported back to Asia, and authorities have come across several auction houses that specialise in this area of expertise.

Trade levels

Belgium, Croatia, Cyprus, Denmark, and Spain observed an increase in private individuals selling personal items of pre-Convention worked ivory for the purposes of making profit during an economic crisis rather than wanting to own ivory themselves, inheriting items, or because a neighbouring Member State no longer issue EU certificates.

Croatia noted a slight increase in the online sale of ivory sculptures and knife handles over 2012–2016, while an increase in the trade of musical instruments (containing ivory) was observed in Sweden. This was mainly attributed to increased awareness that pianos with ivory keys were CITES listed specimens and should be declared.

Pre-Convention raw ivory (post-1947)

Types of products in trade

More than 82% of all raw ivory traded internally within the EU between 2012 and 2016 involved elephant tusks. Belgium, Cyprus, Croatia, Denmark, Germany, Greece, Finland, Italy, the Netherlands, and Slovenia all confirmed this finding.

Purposes of trade

Cyprus, Croatia, and the Netherlands reported that intra-EU trade in raw ivory was mainly for commercial purposes.

Germany noted that raw ivory (both elephant tusks and ivory pieces) are mainly destined for Asian markets. Since 2014, Germany has suspended the issuance of re-export certificates of ivory for commercial purposes, however, based on German EU certificates, elephant tusks have been re-exported via other EU Member States. Belgium also specifically noted that elephant tusks are often purchased and then re-exported to third countries.

Belgium and France reiterated their historical links with African countries, which has not only resulted in collections of worked ivory, but also of raw ivory, that are now being sold by private individuals for profit. Several Member States, including Belgium, noted the impact the economic crisis has had on individuals, resulting in their desire to sell their personal collections as a way to ease financial hardship.

Trade levels

Belgium and Spain have observed an increase in applications for EU certificates for tusks between 2012 and 2016. Spain saw an increase in 2016 of over three times the amount in 2012, possibly due to people no longer wanting the items, wanting to make money from the sale (in an economic crisis), or neighbouring Member States banning the trade and re-export of ivory.

As noted above, Germany banned commercial re-exports of raw ivory in April 2014 and believes that specimens may have been re-exported via other Member States not implementing similar stricter measures. Since May 2016, France no longer issues EU certificates and in August 2016 introduced strict restrictions on ivory trade, going beyond EU requirements. Further to criticisms by affected stakeholders and possible legal challenges, the act was amended in May 2017 to relax the conditions
governing trade in some ivory items, particularly antiques, ivory parts of some musical instruments, knives and pipes. The current rules ban domestic trade in raw ivory.

Ivory craftsmen inside the EU

Only Germany, Spain, and France reported active ivory craftsmen in the questionnaire however the numbers are very low and declining, with their work focusing mainly on restoration. Ivory carving was also reported in Croatia, Italy and Sweden (Table 5).

Manufacture or restoration of musical instruments is more widespread with ten Member States (Cyprus, the Czech Republic, Denmark, Germany, France, Ireland, Italy, the Netherlands, Poland, UK) reporting companies involved in re-export, import or intra-EU trade although the number of companies is less than ten in all except the UK (11–100), France (101–500) and Germany (<500).
Table 5: Responses regarding ivory carving (craftsmen) in Member States. Source: Questionnaire responses.

<table>
<thead>
<tr>
<th>Country</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Germany</td>
<td>14 handicraft enterprises are registered, however only three have been actively selling ivory since 2008. In addition, the number of craftsmen carving ivory for sale has declined to near zero. No new items are being produced. Ivory is mainly used for restoration or repair purposes for musical instruments or antique furniture.</td>
</tr>
<tr>
<td>France</td>
<td>Approximately five sculptors, 35 cutlery manufacturers, several musical instruments manufacturers (bow, piano etc.) and art restorers.</td>
</tr>
<tr>
<td>Spain</td>
<td>Eight.</td>
</tr>
<tr>
<td>UK</td>
<td>The authorities have no information on ivory craftsmen, although there may be craftsmen capable of repairing ivory.</td>
</tr>
<tr>
<td>Sweden</td>
<td>There are knife makers, but according to information available to the authorities, they use other ivory than elephant (mammoth, walrus etc.).</td>
</tr>
</tbody>
</table>

6. Sectors involved in ivory trade

A total of 22 EU Member States (Austria, Belgium, Croatia, Cyprus, the Czech Republic, Denmark, Estonia, Germany, Greece, France, Finland, Hungary, Ireland, Italy, Latvia, the Netherlands, Poland, Slovenia, Slovakia, Sweden, Spain, and the UK) provided responses to these questions concerning sectors involved in the ivory trade.

The main sectors involved in re-export, import and intra-EU are the antiques (11 Member States re-export, 10 imports, 12 intra-EU) and auction houses (13 Member States re-export, 8 imports, 12 intra-EU) (Tables 6, 7, 8). Germany, France and the UK have the highest number of companies in these sectors with over 100 antiques and auction houses. Sweden has the second largest number of antiques companies (between 101–500) and auction houses (between 11–100). Austria, Belgium, Cyprus, Czech Republic, Hungary, Croatia, Ireland and Denmark all reported between 1-100 antiques or auction houses (Table 9).

Other sectors involved in re-export are musical instrument manufacturers (8 Member States) or purchase/export operations (7) (Table 6) and in imports are the hunting sector (14) and musical instrument manufacturers (7) (Table 7). Germany reported 118 companies working in the hunting sector and Hungary reported >500 private individuals involved in intra-EU trade (Table 8). Belgium noted that the companies specialising in re-export of raw ivory are linked to those based in France, the Netherlands, Austria, and Germany but they apply for permits in Belgium due to the other Member States no longer issuing permits for trade.
### Table 6: Sectors involved with re-exports. Source: Questionnaire responses

<table>
<thead>
<tr>
<th>Type of sector</th>
<th>Involvement in trade (No. of traders if stated)</th>
<th>Total no. of Member States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antiques</td>
<td>BE (5), CZ, DE (10), ES, FR, HU, IE, IT, NL, SE, UK</td>
<td>11</td>
</tr>
<tr>
<td>Auction houses</td>
<td>AT, BE (2), CY, DE (16), DK, ES, FR, HU, IE, IT, NL, SE, UK</td>
<td>13</td>
</tr>
<tr>
<td>Musical instrument manufacturing</td>
<td>CZ, DE (52), FR, IE, IT, NL, PL (2), UK</td>
<td>8</td>
</tr>
<tr>
<td>Carving</td>
<td>FR, IT</td>
<td>2</td>
</tr>
<tr>
<td>Companies specialised in purchase/export operations</td>
<td>AT, BE (10), DE (2), ES, FR, IT, UK</td>
<td>7</td>
</tr>
<tr>
<td>Others</td>
<td>DE (2 weapons manufacturers), EL (public sector/museum), ES, SI (private individual), FR (taxidermists), UK (companies exporting to Asia for recycle/re-carving)</td>
<td>6</td>
</tr>
</tbody>
</table>

### Table 7: Sectors involved with imports. Source: Questionnaire responses

<table>
<thead>
<tr>
<th>Type of sector</th>
<th>Involvement in trade (No. of traders if stated)</th>
<th>Total no. of Member States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antiques</td>
<td>BE, CY, CZ, DE (10), FR, HU, IE, IT, NL, UK</td>
<td>10</td>
</tr>
<tr>
<td>Auction houses</td>
<td>CY, DE (13), FR, HU, IE, IT, NL, UK</td>
<td>8</td>
</tr>
<tr>
<td>Musical instrument manufacturing</td>
<td>CY, CZ, DE (15), IT, NL, PL (2), UK</td>
<td>7</td>
</tr>
<tr>
<td>Carving</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Hunting sector</td>
<td>AT, BE (2), CZ, DE (118), DK, FR, HR (7), HU, IT, LV (1), SE, SK, UK</td>
<td>13</td>
</tr>
<tr>
<td>Others</td>
<td>EL (private sector/museum), ES, FI (museums), HR, IT (private individual)</td>
<td>5</td>
</tr>
</tbody>
</table>

### Table 8: Sectors involved with intra-EU trade. *= Antique ivory specimens, **= Pre-Convention specimens. Source: Questionnaire responses

<table>
<thead>
<tr>
<th>Type of sector</th>
<th>Involvement in trade (No. of traders if stated)</th>
<th>Total no. of Member States</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antiques</td>
<td>BE (10), CZ, DE, DK, ES, FI, FR, HU, IE, IT, SE, UK*</td>
<td>12</td>
</tr>
<tr>
<td>Auction houses</td>
<td>BE (10), CY, CZ, DE, DK, ES, FR, HU, IE, IT, SE, UK*</td>
<td>12</td>
</tr>
<tr>
<td>Musical instrument manufacturing</td>
<td>BE (5), CY, CZ, DE, DK, FR, IT, UK*</td>
<td>8</td>
</tr>
<tr>
<td>Carving</td>
<td>DE, ES, FR, IT, SE</td>
<td>5</td>
</tr>
<tr>
<td>Others</td>
<td>AT**, FI**, HR, HU (private individual), EL (public sector/museums), ES (import/export), FR (taxidermists)</td>
<td>7</td>
</tr>
</tbody>
</table>
Table 9: Number of companies involved in re-export, import or intra-EU trade per sector (14 Member States responded – Austria, Belgium, the Czech Republic, Cyprus, Germany, Denmark, France, Hungary, Croatia, Ireland, Poland, Sweden, Slovenia, UK). Source: Questionnaire responses

<table>
<thead>
<tr>
<th>Sector</th>
<th>No. of companies</th>
<th>1-10</th>
<th>11-100</th>
<th>101-500</th>
<th>&gt;500</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antiques</td>
<td></td>
<td>AT, HU, IE</td>
<td>BE, CZ, HR</td>
<td>DE, SE</td>
<td>FR, UK</td>
</tr>
<tr>
<td>Auction houses</td>
<td></td>
<td>AT, BE, CY, CZ, HR, HU, IE</td>
<td>DK, SE</td>
<td>DE, UK</td>
<td>FR</td>
</tr>
<tr>
<td>Musical instrument manufacturing</td>
<td></td>
<td>BE, CY, CZ, DK, HR, IE, PL, SE</td>
<td>UK</td>
<td>FR</td>
<td>DE</td>
</tr>
<tr>
<td>Carving</td>
<td></td>
<td>HR</td>
<td>DE, FR, SE</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Others</td>
<td></td>
<td>AT(export), SI (private individual)</td>
<td>DE (hunting)</td>
<td>HU (private individual)</td>
<td></td>
</tr>
</tbody>
</table>

7. Links between the sectors involved in intra-EU trade and extra EU-trade

There was little evidence provided but some Member States have witnessed antiques, auction houses and private individuals purchasing legal ivory in the EU and then re-exporting it to Asia (Table 10).

Table 10: Responses from Member States regarding links between sectors involved in intra-EU and extra-EU trade. Source: Questionnaire responses

- **Austria**
  - Individuals and companies seen to purchase ivory in the EU and sell to mainland China and HK SAR.

- **Belgium**
  - Some auction houses and companies buy legal ivory (with EU certificates) from private individuals and then re-export them from Belgium.

- **Hungary**
  - There are certain antiques and auction houses who sell antique and pre-Convention ivory in both intra and extra EU trade.

- **Slovenia**
  - Reported that they issued 16 re-export certificates for 20 raw tusks in 2016, and 17 re-export certificates for raw 21 tusks in 2015 destined for CN and HK SAR, all of which had previously issued EU certificates from another Member State.

- **Sweden**
  - Auction houses are a link between intra-EU and extra-EU trade.
8. Illegal ivory trade in the EU

Illegal trade in ivory has been rising over the last decade, with significant increases observed since 2007. According to the latest ETIS reports, European countries have not been listed as “primary concern”, “secondary concern” or “important to watch” in the global ivory trade review. Yet according to reported seizure data, EU Member States are frequently intercepting ivory destined for the EU market, in transit through the EU, or on (re)-export to various countries of destination.

As previously mentioned, when reviewing this information, it should be noted that not all EU Member States submit seizures reports for analysis, and that those submitting reports do not do so for all years. It is also important to note that there is no common definition of what constitutes a “significant seizure” and that Member State interpretation of this meaning differs. For example, one Member State may only consider seizures involving large quantities of ivory “significant”, while other Member States may consider all seizures of ivory significant, irrespective of quantity.

Methodology

In order to quantify the EU’s involvement in illegal ivory trade, data on seizures between January 2014 and December 2016 involving ivory carvings, ivory pieces and elephant tusks were extracted from significant seizure reports submitted by EU Member States to the European Commission. In total, 15 of the 28 EU Member States (Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, the Netherlands, Portugal, Romania, Spain, Sweden and the UK) reported significant seizures involving elephant ivory.

Finally, some EU Member States report seizure records in both number of specimens and mass (kg). Therefore, for the purposes of this report, we have analysed the total volume of ivory seized and then in addition, calculated the number of specimens based on those records which did not provide any information on mass (kg).

In addition to the significant seizures data, a total of 18 EU Member States (Austria, Bulgaria, Czech Republic, Denmark, Estonia, Germany, Finland, France, Hungary, Ireland, Italy, Latvia, the Netherlands, Poland, Romania, Sweden, Slovenia, and the UK) responded to the section of the questionnaire concerning illegal trade in elephant ivory providing details of the products types and seizure routes, whether any increases or decreases in seizure levels have been observed, as well as whether any linkages have been observed between legal and illegal trade.

Key findings on illegal trade in EU

- Overall, the volume and number of specimens seized in the EU have steadily increased over the years, with EU Member States reportedly seizing the highest volume and additional number of specimens in 2016; ca. 900 kg and 1655 specimens, respectively.
- Since 2014, seizures on export have been frequent and mainly involved small quantities of elephant ivory carvings destined for Asia, mainly mainland China and Viet Nam. Seizures on export involving elephant tusks were less frequently reported, however according to additional information provided by EU Member States, there were several seizures of this nature. For example, in May 2016, German authorities seized shipments containing raw and worked ivory totalling 625 kg en route to consignees in Viet Nam. It is also noteworthy that the Czech Republic has observed an increase in the number of seizures of large quantities of raw ivory in recent years, which is a new phenomenon for the country.
Overview of EU ivory seizures

Between 2014 and 2016 EU Member States reported a total of 776 seizure records of significant seizures involving ca. 2285 kg and an additional 3626 specimens of elephant ivory carvings, pieces and tusks. A total of ca. 85% of seizure records involved African Elephant *Loxodonta africana*, ca. 2.5% involved Asian Elephant *Elephas maximus* and the remaining ca. 13% were reported at a higher taxonomic level Elephantidae spp.

Despite the number of seizure records decreasing between 2015 and 2016 (from 325 records to 276, respectively), the year 2016 saw the highest volume and additional number of specimens of elephant ivory carvings and tusks seized inside the EU. Of note is that EU Member States reported a large number of seizures of elephant tusks in recent years, particularly in 2016. For example, in 2016, the Czech Republic seized a total of 126 kg of elephant tusks during searches at four antique shops, Germany reported an internal seizure of 570 kg of ivory carvings and tusks, and Austria seized a total of 90 tusks weighing 564 kg.

**Table 11.** EU ivory seizures, total volume and additional number of specimens reported, between January 2014 and December 2016, based on significant seizure reports submitted by 15 EU Member States. NB. These figures do not include two seizures involving a total of 1195 kg of ivory seized in Germany; one seizure involving 625 kg of ivory seized on re-export *en route* to Viet Nam, and one internal seizure involving 570 kg in 2016. *Source: Significant seizures reports*

<table>
<thead>
<tr>
<th>Year</th>
<th>No. of seizures</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>175</td>
<td>513.4</td>
<td>970</td>
</tr>
<tr>
<td>2015</td>
<td>325</td>
<td>871.1</td>
<td>1001</td>
</tr>
<tr>
<td>2016</td>
<td>276</td>
<td>900.9</td>
<td>1655</td>
</tr>
<tr>
<td>TOTAL</td>
<td>776</td>
<td>2285.4</td>
<td>3626</td>
</tr>
</tbody>
</table>

Based on the questionnaire responses, between 2012 and 2016, EU Member States (Austria, Bulgaria, Czech Republic, Denmark, Estonia, Germany, Finland, France, Hungary, Ireland, Italy, Latvia, the Netherlands, Poland, Romania, Slovenia, Sweden and the UK) reported a total of 586 seizure records involving a total of ca. 4260 kg and an additional 2194 specimens. According to the information provided in the responses, there has been a steady increase in the number of seizure records from 70

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30 Listed in order of importance.
records reported in 2012 to 190 reported in 2016, and in the actual volume of elephant ivory seized, from ca. 458 kg in 2012 to ca. 2110 kg in 2016. Such increases in the detected cases of illegal trade should be interpreted with caution as these may not only reflect an increase in illegal trade – the increase could equally be related to more enforcement action/attention accorded to the commodity or stricter national regulations adopted.

Based on the number of records reported in the significant seizure reports, ivory carvings were the principal product seized in the EU between 2014 and 2016, with 553 seizure records involving a total of ca. 780 kg and an additional 2474 specimens (Table 12). However, when looking at the total volume of elephant ivory seized, elephant tusks were the most seized commodity involving a total of ca. 932 kg (Figure 33).

Table 12. Number of seizure records involving ivory carvings, ivory pieces and elephant tusks in the EU between January 2014 and December 2016, based on significant seizure reports submitted by 15 EU Member States. Source: Significant seizures reports.

<table>
<thead>
<tr>
<th>Year</th>
<th>Ivory carvings</th>
<th>Ivory pieces</th>
<th>Elephant tusks</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014</td>
<td>96</td>
<td>24</td>
<td>55</td>
</tr>
<tr>
<td>2015</td>
<td>243</td>
<td>55</td>
<td>27</td>
</tr>
<tr>
<td>2016</td>
<td>214</td>
<td>38</td>
<td>24</td>
</tr>
<tr>
<td>TOTAL</td>
<td>553</td>
<td>117</td>
<td>106</td>
</tr>
</tbody>
</table>

Again, based on significant seizure reports, the total volume of elephant ivory carvings reportedly seized (based on reports in kg) remained similar across the 2014-2016 period with ca. 260 kg seized per annum, while the volume of ivory pieces and elephant tusks fluctuated at different levels (Figure 33). In addition to reported volume seized, 2474 ivory carvings, 797 ivory pieces and 355 elephant tusks were reportedly seized between 2014 and 2016. Between 2014 and 2015, there was a significant increase in the number of ivory pieces seized, from 30 specimens to 420 specimens. This was mainly due to France reporting 32 seizure records involving 298 ivory pieces in 2015 (from two seizure records involving seven specimens in 2014). During this three-year period, another significant increase was seen between 2015 and 2016 where EU Member States reportedly seized over double the number of specimens of ivory carvings, from 557 specimens to 1192 specimens, respectively. This was due to France and the UK each reporting the seizure of more than 500 ivory carvings in 2016.
Figure 33. Total volume of ivory carvings, ivory pieces and elephant tusks seized by EU Member States between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

According to the questionnaire responses, the main type of elephant ivory product seized were ivory carvings. Several Member States provided additional information as to the type of products seized which mainly included figures, pianos, and jewellery items such as bangles, necklaces, bracelets, as well as cutlery and carved elephant tusks. Various other items including household goods and personal items were also seized.

Based on number of records, the EU plays a role as a re-exporter of illegal ivory. Of the 776 seizure records reported between 2012 and 2016, 40% were on re-export, while seizures on import, in transit or inside the EU each accounted for less than ca. 20%. However, according to the total volume and additional number of specimens illegally traded, seizures within the EU and in transit are higher (Table 13).

Table 13. EU ivory seizure records, total volume and additional number of specimens reported, between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Route</th>
<th>No. of records</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Export</td>
<td>307</td>
<td>426</td>
<td>45</td>
</tr>
<tr>
<td>Import</td>
<td>159</td>
<td>246</td>
<td>560</td>
</tr>
<tr>
<td>Internal</td>
<td>166</td>
<td>814</td>
<td>1928</td>
</tr>
<tr>
<td>Transit</td>
<td>111</td>
<td>659</td>
<td>1009</td>
</tr>
<tr>
<td>Unknown</td>
<td>33</td>
<td>141</td>
<td>84</td>
</tr>
<tr>
<td>TOTAL</td>
<td>776</td>
<td>2286</td>
<td>3626</td>
</tr>
</tbody>
</table>

In their responses to the questionnaire the UK specifically reported an increase in the number of seizures internally as a result of investigations into online trade.

Trade levels

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3) These figures do not include Germany’s recent internal seizures of shipments containing raw and worked ivory totalling 625 kg which were en route to consignees in Viet Nam, or the subsequent seizures involving a total of 570 kg of ivory carvings and tusks of various sizes.
According to the textual information provided, EU Member States reported both a decrease and an increase in the number of seizures involving elephant ivory between 2012 and 2016. France and the Netherlands were the only Member States to report that the number of seizures and the quantities seized had remained stable between 2012 and 2016, with France stating that between 50 and 100 seizures occur each year.

Germany, Romania, and Sweden all declared that the number of elephant ivory seizures had decreased over the years, however Germany noted that this was not the case for the actual quantity of ivory seized, which had increased since 2012 due to several large seizures. Romania cited increased enforcement efforts by Customs officers as having a direct impact on this trend, while Sweden acknowledged the vigilance of the public in reporting illegal activities.

The Czech Republic and the UK both reported that the number of seizures and the quantities of ivory seized had increased between 2012 and 2016.

The Czech Republic noted that this increase was a result of a number of seizures involving large quantities of raw ivory in recent years, which is a new phenomenon for the country. Furthermore, there have been a number of allegedly antique ivory items being sold via the internet which have been seized by enforcement authorities.

In 2015, the UK Border Force began targeted operations to tackle the (re-)export of historical ivory from the UK to global markets. Similar to Sweden, the UK also acknowledged growing public awareness surrounding ivory trade which has resulted in increased reporting of potentially illegal activity.

Links between legal and illegal trade

The legal acquisition of ivory in the EU with the intent of then shipping items to third countries was acknowledged by some Member States. For example, in 2015, Finnish Customs at the Port of Helsinki inspected a vehicle containing 19 whole elephant tusks (weighing ca. 480 kg) which had been purchased in Germany with valid EU certificates. The items originated from an ivory carving business in Germany that was selling its ivory stockpiles. The shipment was intercepted when authorities suspected the vehicle was en route out of the EU to Russia. The driver of the vehicle was later able to prove legal origin of the specimens, and the shipment was released. However, the same vehicle and driver was then later detained at the Russian border when attempting to export four ivory figures (which were purchased in the EU) as part of a large shipment of antiquities without the necessary CITES permit. These specimens were seized.

The UK noted that online platforms are often used to for obtaining ivory – both legally and new items being sold as antiques, which are then shipped out of the EU via the postal service without export documents. The Czech Republic also noted their concerns that new ivory items are being presented as antiques instead. Furthermore, Germany has identified that some of the elephant tusks seized on export in 2016 were legally imported into Germany several years ago.

The forging of permits was also highlighted by Austria as a mechanism for illicit ivory trade. For example, in 2014, an application in Austria was made for the re-export of one elephant tusk with a forged EU certificate from France. Other Member States were not aware of forged documents being used to trade ivory illegally, but instead made reference to the continued attempted re-export of ivory items without the necessary CITES permits or when individuals claim to be unaware as to the need for such permits.
**Significant Seizures**

**EU re-exports of illegal ivory**

Based on significant seizure reports submitted by 15 EU Member States, the EU reported seizures of elephant ivory on re-export, reporting 307 seizure records involving a total of ca. 426 kg and an additional 45 specimens between 2014 and 2016. Ivory carvings were the predominant elephant ivory product seized on (re)-export from the EU, totalling 297 seizure records involving ca. 320 kg and an additional 10 specimens. A further 10 seizure records involved ivory pieces and elephant tusks totalling less than ca. 106 kg and an additional 35 specimens.

Between 2014 and 2015, the number of seizures on (re)-export increased significantly, from 10 records to 162. This was mainly because the UK began targeted checks/controls which resulted in 155 seizure records in 2015 and 117 seizure records in 2016, all involving ivory carvings. As a result, the UK was the main (re)-exporter of elephant ivory between 2014 and 2016, reporting ca. 94% of seizure records (Table 14).

**Table 14.** Total seizure records, total volume and additional number of specimens seized on re-export from the EU between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Exporter</th>
<th>No. of seizure records</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Czech Republic</td>
<td>2</td>
<td>35.5</td>
<td>18</td>
</tr>
<tr>
<td>France</td>
<td>5</td>
<td>171.1</td>
<td>13</td>
</tr>
<tr>
<td>Germany</td>
<td>11</td>
<td>61.9</td>
<td>13</td>
</tr>
<tr>
<td>Portugal</td>
<td>1</td>
<td>8.3</td>
<td>0</td>
</tr>
<tr>
<td>UK</td>
<td>288</td>
<td>148.8</td>
<td>1</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>307</strong></td>
<td><strong>425.6</strong></td>
<td><strong>45</strong></td>
</tr>
</tbody>
</table>

While France reported fewer seizure records, the actual volume seized was significant. In 2016, France seized a total of 140.6 kg of ivory carvings and 30.5 kg of ivory pieces *en route* to Viet Nam, all of which were detected in freight at airports. In 2014, the Czech Republic also reported the seizure of 35.5 kg of elephant tusks *en route* to Viet Nam which were intercepted because of targeting based on intelligence.

Based on the number of seizure records, the majority of (re)-exports were destined for mainland China (204 seizure records), and a further seven records were destined for Viet Nam32. While not reported as part of the significant seizures, it is noteworthy to highlight a significant ivory seizure that occurred in 2016. In May 2016, German authorities internally seized shipments containing raw and worked ivory totalling 625 kg *en route* to consignees in Viet Nam. This then led to an internal seizure involving a total of 570 kg of ivory carvings and tusks of various sizes33.

Other countries of destination included HK SAR, Indonesia, Russian Federation, and Switzerland. Seizures of elephant ivory on (re)-export from the EU were mainly detected in postal parcels at mail centres (88%, based on number of seizure records). A further 10% were intercepted at airports.

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32 It should be noted that 86 seizure records had unknown/unreported destinations.
33 The information regarding these seizures of ivory in Germany was obtained from open sources; German Customs Administration, ZOLL (https://www.zoll.de/SharedDocs/Pressemittelungen/DE/Artenschutz/2016/189_elfenbein.html?nn=20202) and RBB 24 (seizure of 570 kg of ivory) (http://www.rbb-online.de/panorama/beitrag/2016/09/elfenbeinfund-praesentation.html)
**EU imports of illegal ivory**

Between 2014 and 2016, EU Member States reported 159 seizure records on import, involving a total of ca. 246 kg and an additional 560 specimens. A total of ca. 84% of seizures (based on number of records) were destined for the EU, however the remaining ca. 16% reported unknown destinations. France, the UK, Germany, and the Netherlands\(^{34}\) reported ca. 95% of EU seizures on import (based on the number of seizure records) which mainly involved ivory pieces and carvings (Table 15).

**Table 15.** Total seizure records, total volume and additional number of specimens of ivory carvings, ivory pieces and elephant tusks seized on import into the EU by EU Member States between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Product</th>
<th>No. of seizures</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ivory carvings</td>
<td>79</td>
<td>81</td>
<td>82</td>
</tr>
<tr>
<td>Ivory pieces</td>
<td>62</td>
<td>80</td>
<td>462</td>
</tr>
<tr>
<td>Elephant tusks</td>
<td>18</td>
<td>85</td>
<td>16</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>159</strong></td>
<td><strong>246</strong></td>
<td><strong>560</strong></td>
</tr>
</tbody>
</table>

Over the three-year period, the only significant increases in reported seizures on import involved raw ivory, specifically ivory pieces and elephant tusks. In 2014, EU Member States reported 12 seizure records involving ivory pieces (comprising of ca. 15 kg and an additional 21 specimens), however in 2015 the number of seizure records rose to 42 (involving ca. 63 kg and an additional 380 specimens). Exporters of ivory pieces destined for the EU included the USA, Kenya, mainland China, South Africa, and Switzerland, however the majority of seizure records reported an unknown country of export. France reported ca. 88% of these seizures (37 seizure records) which involved a total of ca. 56 kg and an additional 280 specimens (ivory pieces). The majority of these seizures were intercepted on roads (ca. 73%).

Between 2014 and 2015, there was also an increase in seizures involving elephant tusks, from four seizure records comprising of ca. 9 kg and an additional five specimens to 11 seizure records involving ca. 64 kg and an additional 11 specimens. France reported ca. 81% of these seizure records. Several exporters of elephant tusks were countries in Africa, including South Africa, Ethiopia, Botswana, Chad and Côte d’Ivoire, however the majority of seizure records had an unknown country of export.

**EU as a transit location**

EU Member States were reported as transit locations for a total of 111 seizure records between 2012 and 2016, involving ca. 659 kg and an additional 1009 specimens of elephant ivory. Ivory carvings were the predominant elephant ivory product seized in transit in the EU, accounting for ca. 74% of records, ca. 27% total volume and ca. 81% of specimens. Germany and France together reported ca. 86% of seizure records.

Seizures reported in volume and additional number of specimens remained relatively stable over the years, aside from an increase in the volume and additional number of specimens of ivory carvings reportedly seized in 2015. However, in general, 2016 saw the highest volume and additional number of specimens of elephant ivory seized in transit through the EU (Table 16).

\(^{34}\) Listed in order of importance
Table 16. Total volume and additional number of specimens of ivory carvings, ivory pieces and elephant tusks seized in transit by EU Member States per year between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Year</th>
<th>Ivory carvings</th>
<th>ivory pieces</th>
<th>Elephant tusks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total mass (kg)</td>
<td>No. of specimens</td>
<td>Total mass (kg)</td>
</tr>
<tr>
<td>2014</td>
<td>71</td>
<td>27</td>
<td>18</td>
</tr>
<tr>
<td>2015</td>
<td>99</td>
<td>311</td>
<td>139</td>
</tr>
<tr>
<td>2016</td>
<td>6</td>
<td>481</td>
<td>150</td>
</tr>
<tr>
<td>TOTAL</td>
<td>176</td>
<td>819</td>
<td>307</td>
</tr>
</tbody>
</table>

Based on the number of seizure records, the EU is being utilized as a transit point for elephant ivory being exported from countries in Africa, mainly Western and Central Africa, en route to Asia. A total of 78 seizure records (involving ca. 510 kg and an additional 21 specimens) confirm this trend which mainly involved ivory carvings and ivory pieces (Table 17). A total of 88% of these records were reported by Germany and France, others included the Netherlands and the UK.

Table 17. Exporters in Africa of elephant ivory seized in transit in the EU en route to mainland China, HK SAR and Viet Nam between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Exporter</th>
<th>No. of seizures</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Angola</td>
<td>8</td>
<td>302</td>
<td>0</td>
</tr>
<tr>
<td>Benin</td>
<td>3</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>The Democratic Republic of Congo</td>
<td>2</td>
<td>150</td>
<td>0</td>
</tr>
<tr>
<td>Côte d’Ivoire</td>
<td>3</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Equatorial Guinea</td>
<td>6</td>
<td>7</td>
<td>0</td>
</tr>
<tr>
<td>Ghana</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Guinea</td>
<td>9</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Kenya</td>
<td>1</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Liberia</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Malawi</td>
<td>7</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Mali</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Mozambique</td>
<td>1</td>
<td>6</td>
<td>0</td>
</tr>
<tr>
<td>Nigeria</td>
<td>31</td>
<td>24</td>
<td>16</td>
</tr>
<tr>
<td>Senegal</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Sierra Leone</td>
<td>1</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>South Africa</td>
<td>2</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>TOTAL</td>
<td>78</td>
<td>510</td>
<td>21</td>
</tr>
</tbody>
</table>

Various methods were reportedly used to attempt to trade elephant ivory illegally through the EU, for example (extracted from the six-monthly significant seizure reports):

- In 2014, 4.08 kg African Elephant ivory carvings (61 specimens) were exported from Côte D’Ivoire through France en route to HK SAR. The specimens were detected in express freight at an airport because of targeting based on risk assessment and were seized due to the lack of permit;
- In April 2015, 14.22 kg of elephant carvings was detected in a postal parcel at the mail centre in Germany during Customs documentary check and seized due to lack of CITES permits.
specimens had been exported from the Democratic Republic of Congo and were destined for Viet Nam.

- In May 2015, 239 pieces (approx. 2 kg) of African Elephant ivory were detected in a personal bag of a Chinese national at the airport by Romanian Customs. The goods were seized due to the lack of CITES permits.

- In October 2015, Germany seized a total of 300 ivory carvings made of African Elephant Loxodonta africana in transit from Nigeria and Côte d'Ivoire to mainland China and Viet Nam. The elephant ivory specimens were detected in postal parcels at an airport as a result of random control. Seized due to lack of permit.

- In 2015, France seized 26 kg of African Elephant ivory tusks in transit from Angola to Viet Nam. The specimens were detected in personal baggage during random control.

- In 2016, France also reported the seizure of 805 carvings exported from Nigeria en route to HK SAR. These specimens were found in freight and detected due to targeting based on risk assessment.
Internal EU trade

According to significant seizure reports submitted by EU Member States, seizures within the EU accounted for 166 seizure records, of which France reported ca. 61%, Spain ca. 22% and the Netherlands ca. 9%. Other Member States that reported internal EU seizures included Austria, Germany, Sweden, the Czech Republic, Finland, Hungary, and the UK. A total of ca. 813 kg and an additional 1928 specimens were reportedly seized of which ivory carvings and elephant tusks were the predominant products seized inside the EU (Table 18).

Table 18. EU seizure records, total volume and additional number of specimens of ivory carvings, ivory pieces and elephant tusks seized inside the EU by EU Member States between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Product</th>
<th>No. of seizures</th>
<th>Total mass (kg)</th>
<th>No. of specimens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ivory carvings</td>
<td>75</td>
<td>199</td>
<td>1514</td>
</tr>
<tr>
<td>Ivory pieces</td>
<td>22</td>
<td>2</td>
<td>110</td>
</tr>
<tr>
<td>Elephant tusks</td>
<td>69</td>
<td>612</td>
<td>304</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>166</strong></td>
<td><strong>814</strong></td>
<td><strong>1928</strong></td>
</tr>
</tbody>
</table>

Seizure levels fluctuated over the years, however the year 2016 generally saw the highest volume and additional number of specimens of elephant ivory carvings and tusks seized inside the EU (Table 19). It should be noted that this trend is a likely related to the increasing attention on ivory trade, as well as to a number of EU Member States introducing stricter domestic measures and trade suspensions.

Table 19. EU seizure records, total volume and additional number of specimens of ivory carvings, ivory pieces and elephant tusks seized inside the EU by EU Member States per year between January 2014 and December 2016. Source: Significant seizure reports submitted by 15 EU Member States.

<table>
<thead>
<tr>
<th>Year</th>
<th>Ivory carvings</th>
<th>Ivory pieces</th>
<th>Elephant tusks</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total mass (kg)</td>
<td>No. of specimens</td>
<td>Total mass (kg)</td>
</tr>
<tr>
<td>2014</td>
<td>124</td>
<td>643</td>
<td>1.15</td>
</tr>
<tr>
<td>2015</td>
<td>58</td>
<td>184</td>
<td>1.00</td>
</tr>
<tr>
<td>2016</td>
<td>17</td>
<td>687</td>
<td>0</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>199</strong></td>
<td><strong>1514</strong></td>
<td><strong>2.15</strong></td>
</tr>
</tbody>
</table>

Between 2014 and 2016, there were a number of noteworthy internal seizures reported, including:

- In May 2014, France reported the seizure of 288 ivory carvings from a private house due to lack of permits.
- In November 2014, France reported a seizure involving 26 elephant tusks from a second-hand trader due to the lack of EU certificates;
- In 2015, France reported 10 internal seizure records involving the seizure of 100 ivory carvings detected in markets/shops because of targeting based on intelligence and random controls.

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15 It should be noted that these Member States reported three seizures or less, and are listed in order of importance (based on number of records)
• In December 2015, Hungary seized a total of 88 kg of African Elephant ivory tusks from an antique shop in Budapest. The sellers were unable to provide any documentation proving their legal acquisition and the specimens were therefore seized.

• Between July and December 2016, the Netherlands seized a total of 45 ivory pieces from individuals which were offered for sale.

• In April 2016, the Czech Republic seized a total of 126 kg of elephant tusks during searches at four antique shops.

• In November 2016, an individual in Austria was found offering three elephant tusks for sale on the streets of Vienna. As a result, the offender’s properties were searched and a total of 90 African Elephant tusks (weighing a total of 564 kg) were seized.

• In November 2016, the UK reported the seizure of over 500 ivory carvings as a result of a police warrant executed for illegal online trade. As a result, over 500 items of African Elephant ivory carvings were seized.

Table 20 presents the quantities of various ivory types in the different trade directions and types in order to allow comparison of the trade levels across these.
Table 20: Overview of reported ivory trade quantities for 2012-2016

<table>
<thead>
<tr>
<th>Year</th>
<th>Trade direction/type</th>
<th>No. of specimens</th>
<th>Mass (Kg)</th>
<th>No. of specimens</th>
<th>Mass (Kg)</th>
<th>No. of specimens</th>
<th>Mass (Kg)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Tusks</td>
<td>Other raw ivory</td>
<td>Worked ivory</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mass</td>
<td>No. of specimens</td>
<td>Mass</td>
<td>No. of specimens</td>
<td>Mass</td>
<td></td>
</tr>
<tr>
<td>2012</td>
<td>Imports(^{36})</td>
<td>240 (728)</td>
<td>69</td>
<td>71</td>
<td>1928</td>
<td>31</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Re-)exports(^{37})</td>
<td>84</td>
<td>-</td>
<td>-</td>
<td>8465</td>
<td>642(^{38})</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Internal EU</td>
<td>143</td>
<td>5266(^{39})</td>
<td>1</td>
<td>1237</td>
<td>6189(^{40})</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sig. seizures</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Seizures in questionnaires</td>
<td></td>
<td>Total mass: 458 kg</td>
<td>Additional no. of specimens: 669</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2013</td>
<td>Imports</td>
<td>161 (493)</td>
<td>137</td>
<td>268</td>
<td>1291</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Re-)exports</td>
<td>317</td>
<td>-</td>
<td>-</td>
<td>10 979</td>
<td>107</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Internal EU</td>
<td>647</td>
<td>10 647</td>
<td>4</td>
<td>996</td>
<td>560</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sig. seizures</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Seizures in questionnaires</td>
<td></td>
<td>Total mass: 441 kg</td>
<td>Additional no. of specimens: 121</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2014</td>
<td>Imports</td>
<td>116 (364)</td>
<td>74</td>
<td>94</td>
<td>1596</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Re-)exports</td>
<td>590</td>
<td>-</td>
<td>-</td>
<td>7326</td>
<td>37</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Internal EU</td>
<td>194</td>
<td>13 790</td>
<td>14</td>
<td>751</td>
<td>980</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sig. seizures</td>
<td>215</td>
<td>180</td>
<td>30</td>
<td>725</td>
<td>260</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Seizures in questionnaires</td>
<td></td>
<td>Total mass: 501 kg</td>
<td>Additional no. of specimens: 129</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2015</td>
<td>Imports</td>
<td>149 (437)</td>
<td>42</td>
<td>42</td>
<td>2545</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Re-)exports</td>
<td>511</td>
<td>-</td>
<td>-</td>
<td>11 755</td>
<td>229</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Internal EU</td>
<td>300</td>
<td>8308</td>
<td>40</td>
<td>400</td>
<td>2017</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sig. seizures</td>
<td>24</td>
<td>306</td>
<td>420</td>
<td>557</td>
<td>249</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Seizures in questionnaires</td>
<td></td>
<td>Total mass: 748 kg</td>
<td>Additional no. of specimens: 185</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2016</td>
<td>Imports</td>
<td>133 (299)</td>
<td>-</td>
<td>2</td>
<td>623</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>(Re-)exports</td>
<td>-</td>
<td>-</td>
<td>-</td>
<td>4976</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Internal EU</td>
<td>156</td>
<td>4209</td>
<td>7</td>
<td>485</td>
<td>848</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sig. seizures</td>
<td>116</td>
<td>446(^{41})</td>
<td>347</td>
<td>1192</td>
<td>271</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Seizures in questionnaires</td>
<td></td>
<td>Total mass: 2110 kg</td>
<td>Additional no. of specimens: 1038</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Sources: Imports – 2012-2015: CITES trade database reports by importers, i.e. EU Member States, 2016: Member State responses to questionnaire (incomplete information); Exports – 2012-2015: CITES trade database reports by importers, i.e. EU Member States; an attempt was made to convert (ivory) carvings into single pianos, where the possibility of the conversion was clear (and so no. of worked items is lower than in the original dataset downloaded) 2016: Member State responses to questionnaire (incomplete information); Internal EU trade: Member State responses to questionnaire (the most incomplete information, with some reporting Member States only providing partial data, e.g. Germany on for raw ivory trade); Significant (sig.) seizures: Member State biannual reports on significant seizures to the European Commission for 2014-2016 (incomplete information); Seizures in questionnaires: Member State responses to questionnaire (level of detail provided varied and so only high-level summary possible). Notes: Trade/seizure data not taken from the CITES trade database sometimes had both mass and number of specimens reported. In such cases, the mass was used and only additional number of specimens provided.

\(^{36}\) The figures provided in brackets for tusk imports provide the estimated maximum quantities of tusks, including from trophies – converting each trophy to a maximum of two tusks.

\(^{37}\) The re-export data for no. of tusks only comprises trade for commercial purposes.

\(^{38}\) There is a reporting error in the CITES trade database with one record involving 350 kg ivory carvings reportedly re-exported by Belgium in 2012. This unit should have been recorded as grams instead of kilograms. Belgium re-exported a total of ca. 58 kg of ivory carvings in 2012 according to their questionnaire response.

\(^{39}\) Tusks include 1527 kg of ivory reported as tusks and ivory pieces together

\(^{40}\) The amount likely includes two erroneous records reported by Spain, which skews the total: an ivory figurine of 60 cm reported to weigh 4330 kg and another figurine on a wooden based weighing 12115 kg.

\(^{41}\) These figures do not include the large ivory seizures made in Germany in 2016 (over 1000 kg in total).
ANNEX A: Literature review

Below is a compilation of the relevant reports available relating to the topic.


CITES Management Authorities of the European Union Member States completed a questionnaire in 2014 on the re-export of antique and pre-Convention ivory from the EU. Several Member States have requested tightening of EU rules on the trade in pre-Convention ivory, due to the recent increases observed in the re-export of ivory reported by some Member States and the concern that intra-EU trade is occurring with a view to further re-export of ivory from the EU. For example, in January 2013, two men were arrested at Shanghai airport for attempting to smuggle 37 ivory items from France to mainland China reportedly having purchased them from auction houses, antiques shops and fairs in Paris. Fraudulent EU certificates have been detected alongside ivory to be smuggled out of the EU. For example, in May 2014, 60 kg of ivory was detected by German authorities in the baggage of two Vietnamese citizens travelling from the Czech Republic to Viet Nam via Germany accompanied by a falsified Belgian EU certificate.

Increases in commercial re-exports of pre-Convention ivory have been seen progressively since 2007 based on the numbers of trade records in the CITES trade database. Analysis of the EU Member States CITES Annual Report data identified a “notable increase” in EU exports of African Elephant ivory carvings reported as pre-Convention in 2012.

The most commonly cited difficulty associated with assessing applications for re-export of ivory from the EU concerned verification of legal acquisition/importation and extending registration to worked items would likely result in significant administrative burdens.


The UK is historically one of the largest ivory markets in the world. The British Antiques Dealers Association estimates there are more than two million items made of ivory or with an ivory component (including piano keys, ivory as part of furniture, carvings, boxes and knife handles) in British homes. Approximately 20 000 traders are believed to be working in the UK today. The whole art and antiques trade was estimated to be worth GBP1.6 billion to the UK economy.

In 2017, antiques traders were interviewed and took part in an online questionnaire on ivory trade. It found that traders source their stock from a wide variety of sources including house clearance, private sales, fairs, auctions, shops, and car boot sales. The majority of ivory items sold were antique ivory, carved and crafted in Europe but items crafted in mainland China and Japan were also popular. The majority of auctioneers and antiques dealers surveyed stated they were selling more than one hundred items a year, both in physical markets and online, but attributed less than 10% of their total sales to ivory items. The principle buyers were said to be private buyers within the UK & EU, followed by buyers from the Far East.

Almost half of the businesses surveyed were not dependant on sales of ivory items, but some considered it important, for example, one business reported ivory accounted for 75–100% of their turnover. The data suggest that it is larger firms rather than small, single proprietor business that will be most disadvantaged by a ban. 95% of those surveyed relied on their knowledge and experience to assess the age and origin of ivory.
James Lewis of Bamfords’ Auctioneers stated that “Certain parts of the environmental lobby believe in an outright ban—I disagree with that wholeheartedly. My issue is with solid antique ivory, such as carved tusks and large Okimono figures, which end up on shelves in HK SAR beside modern ivory”. (Antiques Trade Gazette, 2016).


A TRAFFIC report was published in 2016 following a rapid assessment of the current commercial UK ivory market, specifically focusing on the antiques sector in London. This report found that although there had been a reduction in the total number of stalls (ca. 640 in 2004 to ca. 200 in 2016) and ivory items (ca. 6000 in 2004 to ca. 3200 in 2016) for sale there was ongoing availability of ivory items. Overall, the items available were reportedly antique and included a wide range of items including figures (including netsukes), household goods (specifically magnifying glasses, cutlery and walking canes) and jewellery (specifically brooches, bangles/bracelets and pendants), found both in physical markets and for sale online. The online survey revealed ca. 1700 ivory items for sale in April 2016. The type of products found were like those found in physical markets.

Traders seemed more concerned with craftsmanship, style of carving and the era and/or provenance of antiquity as indicators of quality and value rather than the material the item was composed of, and in many cases, there was little difference in the price of items composed of ivory and other similar materials. Traders also noted that ivory items were being offered at reduced prices due to the imposition of stricter legislation, which had subsequently reduced demand.

All traders were aware that trade in antique ivory items was permitted however the level of knowledge varied significantly. A number of traders indicated their knowledge/intention for taking antique ivory items out of the EU without the necessary documentation (illegally) or by declaring it as personal/household items or sending them by post. Very few dealers could provide proof of age or documentation to prove legal acquisition. Lack of awareness and/or clarity over the UK’s and destination countries’ regulations on ivory trade and the specifics surround the antiques derogation under the EU Wildlife Trade Regulations, appear to play a major role in this.

Traders reported principal buyers were East Asian citizens from mainland China, Japan, and HK SAR, as well as European citizens such as Germans, Austrian, and Portuguese signifying a change in buyer demographic profile since Martin & Stiles’s survey in 2004 when buyers were found to be mainly from USA, UK, and other European countries. Following legislation changes in 2016, traders reported a dramatic decline in buyers from the USA.


There are two broad categories of illegal ivory markets: 1) newly poached ivory to make new craft items or passed off as synthetic, “ox bone” or treated to appear antique or 2) existing ivory craft items post 1947 passed off as pre-1947 or ox bone. There are concerns that part of the antiques trade are selling post 1947 ivory as pre-1947 pieces, particularly on web based auction platforms.

UK dealers have reported that the guidelines are unclear and unhelpful, and specifically, their confusion at the antiques derogation. On 23 May 2016, Christie, a well-known auction house, were fined GBP3250 for offering for sale an un-carved tusk mounted on silver dating to 1880. Christie claimed to be unaware of a change to guidelines in 2012 making this item no longer subject to the antiques derogation. Traders range from high end dealers and auction houses to “car booters” and
house clearance companies. Educating a disparate and diverse trade will be challenging, particularly as the majority do not belong to a trade association.

Two issues need addressing—a need for a process to ascertain the age of ivory accurately and cheaply, and what will constitute “documentary proof” so as establish the age of an ivory item. One potential response is an “ivory passport” that would remain with an item forever and would replace the EU certificate, which it is suggested is open to abuse due to its lack of robust items categorization and description. Secondly, where the burden of proof should lie. Compensation for dealers and collectors of ivory in the event of a complete closure of the domestic ivory market should be considered.


In the UK, in the Conservative Party manifesto in 2010 and 2015, the party said they would “press for a total ban on ivory sales”. On 21 September 2016, the UK Government announced plans for a ban on the sale of worked ivory produced after 1947. Ornaments and works of art dating prior to 1947 would be classified as “antique” and trade in them permitted. The UK Government had planned to consult with stakeholders to establish how and when a ban could be introduced, as well as any necessary exemptions in 2017.

The UK Government conducted informal discussions with representatives of the arts and antique sector on the scale of the legal trade in ivory. An accurate assessment was challenging as records for antiques may not necessarily record an item as containing ivory where it is only a small component of a larger item. An extrapolation from available data indicates sales of items containing ivory may be worth in order of several tens of millions of pounds (GBP) per annum.

The UK Border Force through Operation Quiver has been successfully targeting ivory sent through postal systems.

The Government has been criticized by some conservation organizations for not going far enough, calling for a ban on all ivory trade. A petition to “shut down the domestic ivory market in the UK” reached 75 683 signatures.


The report pointed out the high number of ivory items, including raw tusks, that were sold through auction houses/websites in France. In just two months, through three dedicated websites offering free access to a wide and international clientele ca. 174 auction houses and auctioneers sold the equivalent of at least two tonnes of ivory (96.7% worked ivory / 3.3% raw ivory) with the South of France offering for sale the most raw ivory. The report also suggested that most of the eventual buyers of the auctioned ivory in France were Chinese, although they usually purchased the ivory via intermediaries. The findings also suggested difficulties with implementing the legislative framework especially regarding establishing the age of ivory specimens. The report provided information on prices of ivory in France.


The comprehensive report starts off by outlining the international context, ivory trade regulation practices in select countries and the situation of France. The report considers the possible advantages and disadvantages of various regulatory measures that France could take in regulating ivory trade and
formulates recommendations for action in France both at the national and at the international/EU levels.


Martin & Stiles conducted a comprehensive market study in Germany, UK, France, Spain, and Italy in 2004. Remaining active craftsmen and new ivory items on sale legally were only found in two small German towns of Michelstadt and Erbach, and the French town of Dieppe but numbers had dramatically declined since the mid-1970s and in Germany, carving had switched to mammoth ivory in most cases. Michelstadt had more ivory than any town or city surveyed in East Asia, except HK SAR but Germany had the strictest control over trade. London had the second highest number of items but over 95% were carved before the CITES ban and lacked proper documentation. The markets were very small in France, Spain, and Italy and mainly consisted of ivory items of Asian origin.

The most probable types of illegal worked ivory being sold in Europe were East Asian and claimed as antique or mammoth ivory, facilitated by internet sales and imported from mainland China.

Most Europeans seemed aware of CITES ivory trade ban and the connection with elephant poaching. This seems to have lowered demand and declined business for ivory in Europe (particularly for less expensive items) however ivory crafting was seen as part of some countries’ cultural heritage and some want to see the art continue.

The UK had the greatest number of outlets openly selling ivory products in the world and ranked ninth in the number of items available. The main concern for ivory vendors in London was the decreased number of visitors from the USA mostly due to the terrorist attack in New York City in 2001 and Americans have been buying fewer ivory items since the CITES ban due to the international campaign against the ivory trade and the time required to obtain a CITES permit. In the annual survey carried out by the London and Provincial Antiques Dealers Association (LAPADA), 55% of the respondents said that their turnover had fallen by an average of 10% from 2002 to 2003. The British Antique Dealers Association is concerned that incorrect and negative publicity has damaged sales of antique ivory objects. Another common complaint was the excessive DEFRA and CITES form-filling required for sales and exports of ivory items; most dealers do not bother with the paperwork. A great proportion of worked ivory for sale could be considered antique or pre-Convention although much of it lacked proper documentation.

In Germany, vendors said the ivory business, including the number of artisans, had been declining since the ivory bans. This was partly because ivory was less fashionable and because some equate obtaining tusks as “a bloody and unsavoury enterprise”, based on illegal killings of elephants in Africa, and partly because the German economy had not been performing well.

References


Cambridge, UK.


### ANNEX B: Reports/research findings/other published literature about ivory trade in Member States

#### Germany

#### France
- IFAW’s report of June 2015: *Ivoire d’éléphant / Lot du jour : adjugé, vendu ! / Aperçu du marché des ventes aux enchères d’ivoire en France* (http://www.ifaw.org/sites/default/files/Ivoire%20d%E2%80%99%C3%A9l%C3%A9phant%20-%20Lot%20du%20jour%20%20adjug%C3%A9%20%C3%92%C0%20vendu%20f.pdf);

#### UK
- Two Million Tusks (2017) *Ivory: The Grey Areas*[^42] (http://nebula.wsimg.com/6f0b004320ee4728d8d6f1b283dd4ec?AccessKeyId=2128905E8DEC809DE8B5&disposition=0&alloworigin=1);

[^42]: Published after this report was written
[^43]: Published after this report was written
Annex C: CITES trade data reporting issues

Inconsistencies in the reporting of specimens in the CITES trade database across EU Member States creates difficulties when trying to determine and examine trade trends. One significant issue is with the reporting of piano keys as EU Member States have the option to report these specimens as either “carvings”, “ivory carvings” or “piano keys”. Some EU Member States report trade in a single item (i.e. a single piano), but others record the total number of piano keys (i.e. 50–52 carvings), or the piano or the piano keys by weight. Furthermore, there appear to be differences in reporting between years.

Examples from the current and previous TRAFFIC data analyses to illustrate how differences in reporting piano keys can affect analysis of ivory trade data

In 2012, one Member State reported the re-export of 350 kg of elephant ivory carvings to mainland China for commercial purposes. This specimen was in fact one piano with ivory piano keys. In this instance, the weight of the piano was reported; while in the following years trade in piano key was reported in weight (of the piano keys) in the CITES trade database. Such discrepancies in reporting could significantly distort the trade data and result in large fluctuations in re-exports between 2012 and 2016.

One Member State reported the following re-exports for 2013-2015: 2013 - 5 (grand) pianos; 2014 - 12 (grand) pianos, 9 other worked items (dagger, sabre, boxes, miniatures); 2015 - 8 (grand) pianos, 17 tusks and 2016: 19 (grand) pianos, 7 worked items (knives, carvings). Therefore, in total between 2013 and 2016 this Member State re-exported 44 grand pianos and 16 other worked items. They reported trade in pianos in their annual report as single specimens. However, in some years these appear to have been converted to numbers of piano keys (multiplied by 50-52) for entry into the database (in 2013 and 2014 resulting in >820 ivory carvings reportedly being re-exported), however in other years they are in the database as single specimens (2015, only 7 specimens re-exported, one piano is missing).

This inconsistency results in apparent large fluctuations in trade in ivory carvings and if all pianos were reported as piano keys for 2013-2016, a total of ~2200 ivory carvings would appear to have been re-exported. This would suggest this Member State trades much higher quantities of ivory carvings than is really the case.

One Member State reported the following re-exports for 2016: 4544 carvings for commercial purposes, but the majority of these are sets of things such as piano keys (3515), chess sets (128) and other ivory sets such as games, cutlery and stationary (422). Another 1233 were re-exported for personal purposes, 1201 of these were pianos or bagpipes. This Member State always reports pianos and sets as the full number of individual items, providing an explanation on this in their notes (as part of the annual report submitted). If the pianos and other sets were counted as one item each instead, the total number of carvings would be reduced significantly.

In summary, in 2016, for commercial purposes, this Member State re-exported 479 individual ivory carvings and 15 sets of small items (making up a total of 550 specimens), with the remainder of commercial trade being pianos (70, reported as 3515 specimens). Even if all sets are counted by their number of specimens, total trade in actual carvings is 1029 specimens, which is less than 25% of the total of 4544 (which includes piano keys). This would suggest this Member State trades much higher quantities of ivory carvings than is really the case.