

Dear Editor

We, Two Million Tusks are writing to express our profound disappointment in ATG's promotion of Alastair Gibson's pro ivory trade petition. Supporters are actively trying to undermine 88% of the UK public who want a full ivory ban, not a watered down version.

During our attendance at the ATG Ivory Debate luncheon (August 2016) with key members of BADA, LAPADA and antique trade personnel we discussed the issues of UK ivory trading. The consensus was; the UK did not have an illegal ivory trade problem. We decided to test this theory and Two Million Tusks was established.

In October 2017 we published an in-depth evidence based report 'Ivory: The Grey Areas' ([www.twomilliontusks.org](http://www.twomilliontusks.org)). The results were shocking. We contacted 72 reputable, well established UK auction houses, requesting information about their ivory lots. 90% of the ivory lots did not have legal proof of age. The remaining 10% of lots were given very lenient benefit of the doubt by us. Our research gave the Government the data they needed to support their rationale for a full ivory ban and was referenced within the Consultation response. During our investigation we were advised by the National Wildlife Crime Unit and the EIA, ensuring our research was balanced and fair while being accurately recorded, processed and analysed.

Auction houses can and will survive with a very small loss of ivory trade revenue - our research shows ivory forms less than 1% of their business. We regularly monitored the sales of ivory on [thesaleroom.com](http://thesaleroom.com) platform and continue to do so daily since the date of the Consultation announcement 06/10/17. Although the figure increased when the Consultation was launched it has stabilised again at 0.81%. Prior to the Consultation Owen Paterson MP worked with conservation groups and trade bodies to reach an amicable agreement about an ivory ban. He was astounded to read 'Ivory: The Grey Areas'. Our research highlights the fact trade bodies have consistently over inflated their estimation of the volume of ivory sold and in turn mislead the Government about the true impact of any type of ban.

Our research revealed a UK auction house, selling an illegal tusk and illegal unworked ivory. They were happy to ship these items to Hong Kong for us, no questions asked! Auctioneers gave a multitude of stories about the origins and age of the ivory they were selling and reasons for not knowing about the pieces or even for changing the description of the item. We are not talking about a ceramic bowl or piece of glass but the origin of a body part from a CITES listed species facing imminent extinction. The auctioneers should make it their business to know as much as possible and to thoroughly check the legality of these items, before even considering selling them. These auction houses are well known, located in towns and cities throughout the UK, many are professional trade affiliates and all sell via [thesaleroom.com](http://thesaleroom.com). All auction houses employ 'experts', yet hide behind their business terms and conditions, surrendering accountability and responsibility. It was an eye-opening experience to deal with them.

We have read all the published letters from your readership; we feel dismayed and frustrated that such misguided and narrow views have often been printed and yet very few pro ivory ban letters have made the light of day. We have heard endlessly too how the trade profess to abhor today's elephant poaching and claim it has nothing to do with antique ivory. Trading all ivory, irrespective of age, has everything to do with today's poaching and actually goes hand in hand. All ivory trade is a demand driver for more ivory to be supplied and to state otherwise is just an act of denial. UK is the world's largest exporter of legal ivory providing a fervent opportunistic cover for illegal trade to flourish and where ivory masquerades as antique. It is well known that solid ivory antique items are sent abroad, often re-carved illegally and sold on, perpetuating the desire and demand for more ivory.

Recently tens of thousands of Avaaz members (a citizens petition movement) donated and made possible for Avaaz to buy over 100 ivory items across Europe and then have them carbon tested at Oxford University. Staggeringly, almost three in four pieces (74.3%) were found to date from **after** the legal age of 1947. Avaaz said 'the findings provided concrete evidence that Europe's trade in legal ivory - items before 1947 - is creating a vehicle for trade in illegal ivory, encouraging elephant poaching'

**Perhaps** now is the time to also acknowledge that today's antique ivory would have historically come from poached elephants, which is no different from illegally poached ivory today in turn becoming tomorrow's antique. As one respected fine art dealer told us 'today's ivory trite is tomorrow's museum piece'.

Dealers, demand we tackle poachers instead of the end retailer and customer. There are of course countries, governments and agencies all working to curb poaching and to close the links in the ivory trade chain right through to the buyer. It is a Herculean task. However, ceasing domestic ivory trade in the UK will send a strong message to other countries yet to impose a ban that we will no longer tolerate the continued barbaric killing of elephants for their ivory. The government have rightly announced a 10% de minimus in the Ivory Ban Bill because until recently, the ease and ability to sell illegal ivory has been a well-kept trade secret. Nationwide there is consistent and endemic flouting of the law, which is utterly shameful. The trade operate with little fear of prosecution due to the hugely overstretched police's National Wildlife Crime Units inability to police all ivory retail outlets. Our analysis of over 133 of lots shows the majority 91% of UK ivory is actually sold for just £400 or less. This dispels the theory most antique ivory has a significant investment value, which may be lost following a ban.

Eight years have passed since the Conservative manifesto first pledged a total ivory ban. This is a generous amount of time for the trade to get their house in order and yet our report clearly and astonishingly shows the trade have continued with no self-governance and little integrity, so yes, the toughest ivory ban has to apply. Elephants will not survive without everything being done to end the demand for ivory and if we are to believe what the trade say, that they too want elephants to survive, then we all need to support this ban with strength, resolve and commitment, not interference and obstruction.

If you would like to follow and support our work please 'like us' on Facebook and follow us on Twitter @2mTusks.

Yours sincerely

# Two Million Tusks