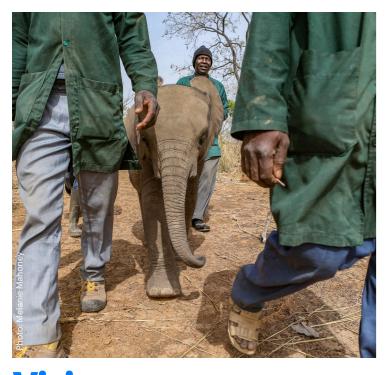
Impact of UK Ivory Act 2018: research snapshot of online trading





Vision: Animals and people thriving together



Mission:
Fresh thinking and bold action for animals, people and the place we call home

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About IFAW - IFAW (International Fund for Animal Welfare) is a global non-profit helping animals and people thrive together. We are experts and everyday people, working across seas, oceans and in more than 40 countries around the world. We rescue, rehabilitate and release animals, and we restore and protect their natural habitats. The problems we're up against are urgent and complicated. To solve them, we match fresh thinking with bold action. We partnerwith local communities, governments, nongovernmental organisations and businesses. Together, we pioneer new and innovative ways to help all species flourish. See how at ifaw.org

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Cover photo: Paolo Torchio / © IFAW

African bush elephant with a bird on its back in Amboseli, Kenya.





Executive summary

- ▶ In June 2022, IFAW welcomed the Government announcement making it illegal to trade elephant ivory items in the United Kingdom (UK), except for very limited exemptions. Those breaking the law face prosecution and a fine of up to £250,000 or up to five years imprisonment.
- ▶ IFAW commissioned an independent researcher MK Wildlife Consultancy in 2021 and 2023 to assess the effectiveness of the Ivory Act. It analysed the quantity of ivory being sold in the UK on online platforms and social media, before and after the Act came into force. The surveys also recorded which ivory-bearing species the advertised items came from, rather than just focus on elephant ivory.
- ▶ Findings across the studies confirm the early indications that the UK Ivory Act is having a positive impact, with 66% fewer adverts and 33% fewer specimens offered on online marketplaces and no significant increase in the proportion of non-elephant

- ivory items between 2021 and 2023. A very limited number of adverts were found on social media in 2023, which suggests traders have not shifted there a positive finding enhanced by the work of these platforms in enforcing their policies.
- ▶ A decline is to be expected in the immediate wake of new legislation, so additional monitoring will be required to assess trends over time. Coordinated efforts from the Government, enforcement agencies, NGOs, online marketplaces, and social media platforms are still needed to raise awareness and support effective enforcement that has an impact on combatting ivory trafficking.
- This research case study provides a model that can be helpful beyond the UK policy landscape to review the impact of ivory hans

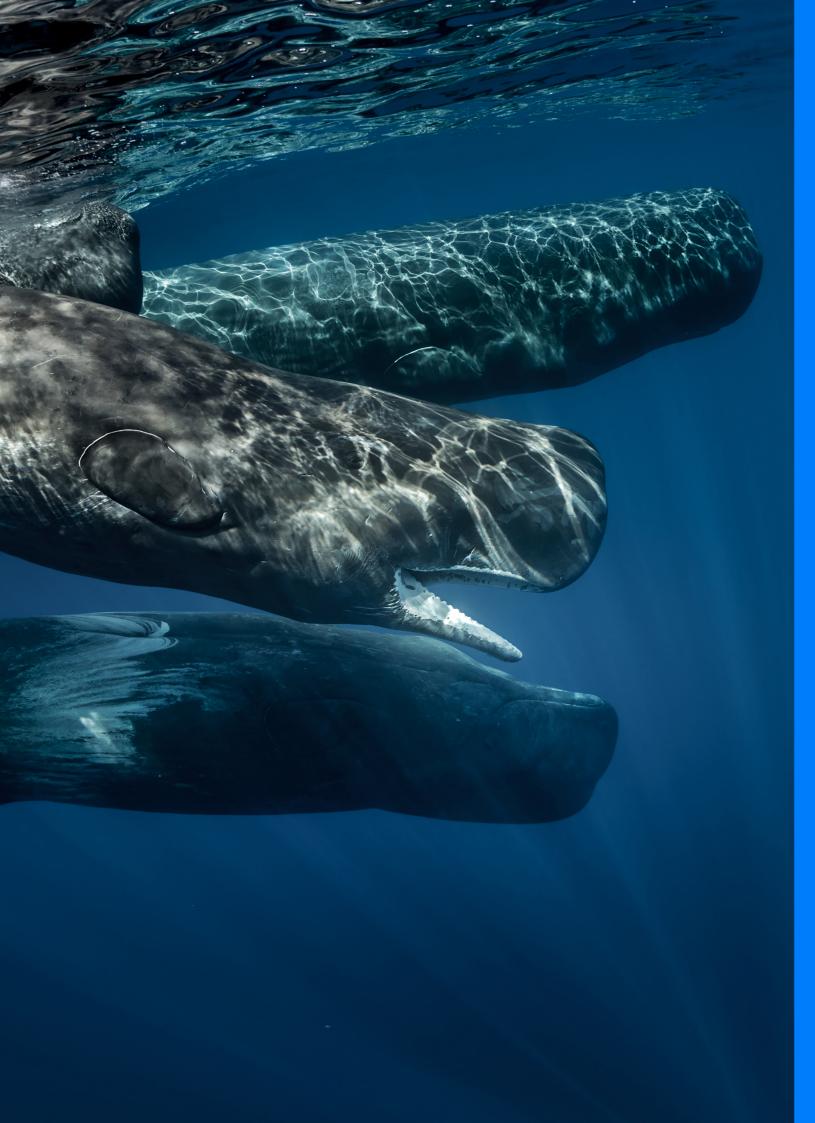


fewer adverts and 33% fewer specimens offered on online marketplaces and no significant increase in the proportion of non-elephant ivory items between 2021 and 2023

£250,000

maximum fine or up to five years imprisonment for those breaking the law under the UK Ivory Act

- lacktrian African elephant.
- ◀ Examples of raw and carved ivory.



Background



Ivory trade in the UK

For years, the UK had one of the biggest ivory markets globally, with the production of ivory items reaching its peak between the 19th century and World War I. Between 1910 and 1914, raw ivory imports soared to 496 tonnes. A significant portion of this ivory was utilised for crafting ornamental, personal, and household objects, which are now regarded as antiques.

Now, the UK plays a significant role in the trade of ivory and has been identified as a large re-exporter. The sale of ivory

antiquities, while reportedly legal pre-Ivory Act, fuels illegal markets and plays a hand in providing trade routes and easy cover-ups for modern ivory sales. In 2020, in under a month, 1.3 tonnes of ivory were seized at UK ports and airports.

The UK ivory trade is mostly prevalent online; research has shown that very little ivory is sold using the dark web, and most of it is accessible, with many ivory items being offered through antique search services.

1.3 tonnes

of ivory were seized at UK ports and airports in 2020

The Ivory Act 2018

The Ivory Act 2018 (Ivory Act) supports the Government's international biodiversity objective of protecting elephants by banning sales of ivory that could contribute either directly or indirectly to poaching. The Act bans the dealing of items made of or containing elephant ivory in nearly all circumstances. By dealing, it means the sale, purchase, or hire (including keeping an item for any of these purposes), as well as offering to sell, purchase or hire. This ban addresses dealings within the UK and exports from and imports into the UK for commercial purposes. The Act gained royal assent in 2018, but didn't come into force until June 2022, where it will sit alongside the current regulatory regime for the trade in endangered species - the Convention on International Trade in Endangered Species of

Wild Fauna and Flora (CITES)¹, which also covers elephant ivory.

If someone is to be found in violation of the Act, they may face prosecution and a fine of up to £250,000 or up to five years imprisonment, depending on the severity of the offence. However, there are standard exemptions which include:

- musical instruments made before 1975 with less than 20% ivory by volume
- ▶ items made before 3 March 1947 with less than 10% ivory by volume
- portrait miniatures made before 1918 with a total surface area of no more than 320
 square centimetres

 items a qualifying museum intends to buy or hire

Full information and advice can be found on the website of the UK's Department for Environment, Food & Rural Affairs (DEFRA), including what you can do with ivory that is not exempt - GOV.UK (www.gov.uk). Since June 2022, at the time of writing, DEFRA has tracked over 6,500 registrations, and over 100 certificates for items exempt from the ban have been issued (i.e., musical instruments, portrait miniatures).

▲ Example of a carved ivory tusk.



Non-elephant ivory

In May 2023, the UK's Department for Environment, Food & Rural Affairs (DEFRA) announced that the Ivory Act would be extended beyond elephant ivory to cover five further endangered species: hippopotamus, narwhal, killer whale, sperm whale, and walrus. This followed a public consultation launched in 2021, where 91% of 997 respondents supported extending the ban on dealing ivory to five additional species. Indeed, the Ivory Act does not yet prohibit the trade of ivory from non-elephant species, and distinguishing the species of origin from their online advertisements becomes very complex in most cases. Having legal trade in non-elephant ivory risks enabling the trade of elephant ivory covertly under the guise of other permitted species,

along with possible pressures that may be put on wild populations of these nonelephant species due to overall demand.

The species of highest concern currently is the hippopotamus, as experts suggest this is the species poachers will most likely turn to as it is already the most common form of ivory after elephant ivory. A YouGov poll commissioned by IFAW in the UK in February 2023 found that 93% of those surveyed thought poaching an animal for their ivory was morally wrong. Less than half of the respondents knew that hippos were being poached for their ivory, yet 90% were in support of extending the existing Ivory Act to include products from non-elephant species.

93%

of those surveyed in YouGov poll thought poaching an animal for their ivory was morally wrong



of those surveyed in YouGov poll were in support of extending the existing Ivory Act to include products from five additional ivory-bearing species

IFAW's holistic approach to combat a global illegal trade

The ban on dealing in elephant ivory is a landmark piece of legislation to protect elephants, for which IFAW and other groups have campaigned tirelessly for many years. As part of its wildlife crime work in the UK, IFAW engages across Government, NGOs, agencies, and global networks such as United for Wildlife (of which IFAW is a member) to share intelligence and support coordinated action on tackling wildlife crime.

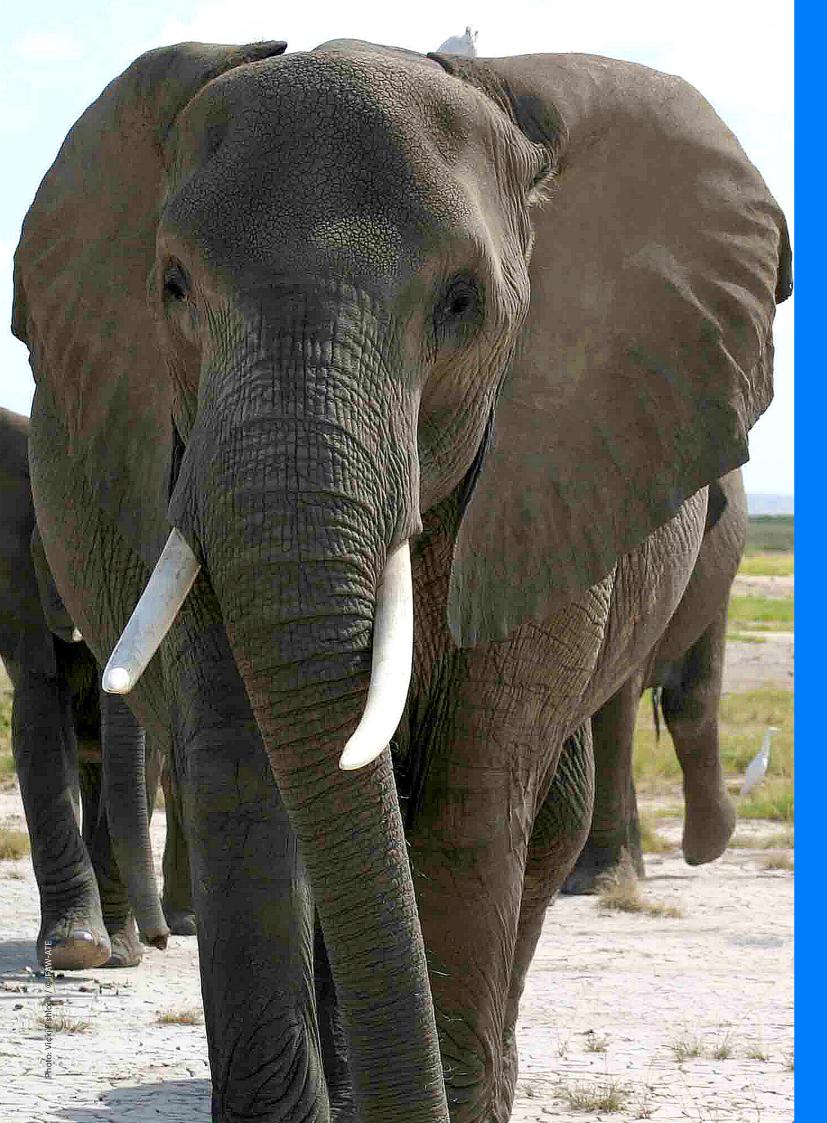
The fight against elephant poaching and illegal ivory trade goes beyond the UK and requires more than policy changes. All around the world, sectors must unite to fight this global threat. IFAW, together with other

partners, works with leading online technology companies on reducing the possibility for wildlife traffickers to use online marketplaces and social media platforms, supports enforcers targeting wildlife criminals, and raises targeted awareness with tailored messaging about the dangers of buying animals and animal parts. IFAW utilises a behaviour centered design approach to understand the drivers behind demand for animals and animal parts – and then develops contextually appropriate initiatives to influence change.

IFAW works through a partnership and facilitation model, supporting networks

of rangers, community members, and professionals around the world to disrupt wildlife trafficking at every stage of the supply chain and protect wildlife. In Kenya, we connect national park rangers, local Maasai community members, and law enforcement officers to create a better system for detecting wildlife crime. Through the sharing of information and the use of high-tech data collection, our teams are able to detect crime before it happens and prevent poaching events.

▲ Hippo swimming in the water with mouth wide open in Amboseli National Park, Kenya.



Assessing the UK Ivory Act



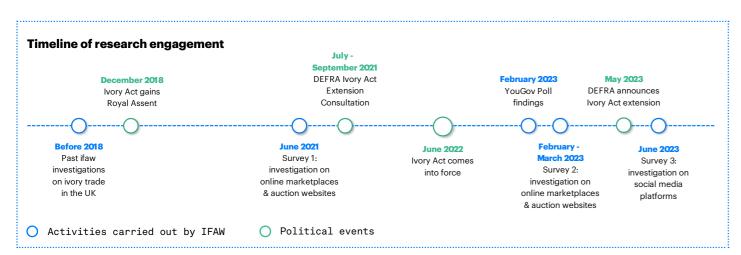
Methodology

In June 2021, IFAW commissioned MK Wildlife Consultancy - an expert researcher in wildlife crime - to undertake a two-week survey of online marketplaces to look for ivory items being advertised. This was to determine the quantity of ivory and from which ivory-bearing species that was being sold in the UK on online platforms, prior to the UK Ivory Act coming into force in 2022. This survey was repeated in February 2023 to get a picture of the same online marketplaces after the Ivory Act came into force and be able to rigorously compare both. A recommendation that arose from those surveys was that a more comprehensive view of the trade should be established by including social media platforms in the assessment to check whether there has been a significant shift to these platforms. This same survey was carried out with selected social media platforms in June 2023.

Distinct from the first and second surveys, where the same websites were compared, different platforms were included in the third survey, including TikTok, Pinterest and Facebook Marketplace. The surveys include ivory items or traders located within the UK and those based overseas but selling on UK sites. All CITES-listed ivory-bearing species were included (e.g., elephant, hippo, walrus, whale, narwhal, and dugong) and were recorded as such. Items that were suspected to be ivory or were identified as ivory by the trader, which could not be identified by species, were recorded as 'Not Known'. On the social media survey, open-source research was done, meaning that they only accessed public information and groups; closed Facebook groups, for example, could not be surveyed. This was also done on the condition that searches, where ivory was advertised with links leading to other sites, would also be included.

The methodology proposed in this report can be replicated to assess other wildlife cybercrime legislation in different contexts and countries. This case study not only gives a comprehensive view of the ivory trade in the UK but also provides a model that can be helpful beyond the UK policy landscape, in the global fight against wildlife cybercrime.

▲ Male narwhal swimming along the surface with its tusk out near





Findings across the three surveys

The 2023 marketplace report found that in comparison to 2021, the number of adverts has been reduced by nearly 66% and the number of specimens offered by almost 71% (there can be multiple specimens sold in one advert). The number of traders advertising possible ivory items has also seen a reduction of about 31%, with the most significant reduction in adverts found on the-saleroom.com and antiques-atlas.com, which dropped by 95% and 91%, respectively (see Appendix 1).

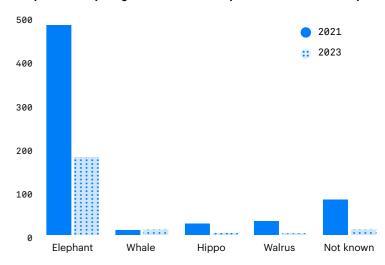
The number of adverts for suspected ivory items has reduced by 27% and 11%, respectively, on Ebay and Etsy, which remain the biggest contributors in the 2023 survey, with an estimated 75% of adverts from the total as opposed to 33% in 2021 (which is the result of the overall ivory online market declining quicker than those two platforms).

Of the seven social media platforms that were chosen to be surveyed, only Pinterest, Facebook Marketplace, Instagram, and Twitter wielded results (see Appendix 2). TikTok, YouTube, and Snapchat did not show any form of ivory being sold. Searches were also carried out on 13 traders who had the most adverts in the 2021 and 2023 surveys, and 5 of them had social media pages. One had pages on all 4 platforms, but none had any recent adverts with ivory items. Pinterest appears to have had the highest number of adverts; however, the adverts were links to third-party websites such as Etsy. A total of 110 ads were found, yet this is a significantly smaller amount compared to the 2023 online marketplace survey, 58% less.

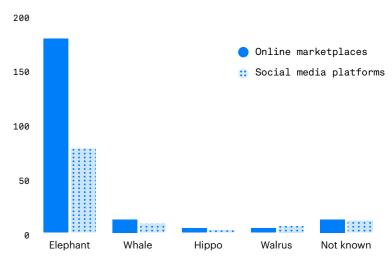
58% less items made from ivory were found on social media than on online marketplaces in 2023

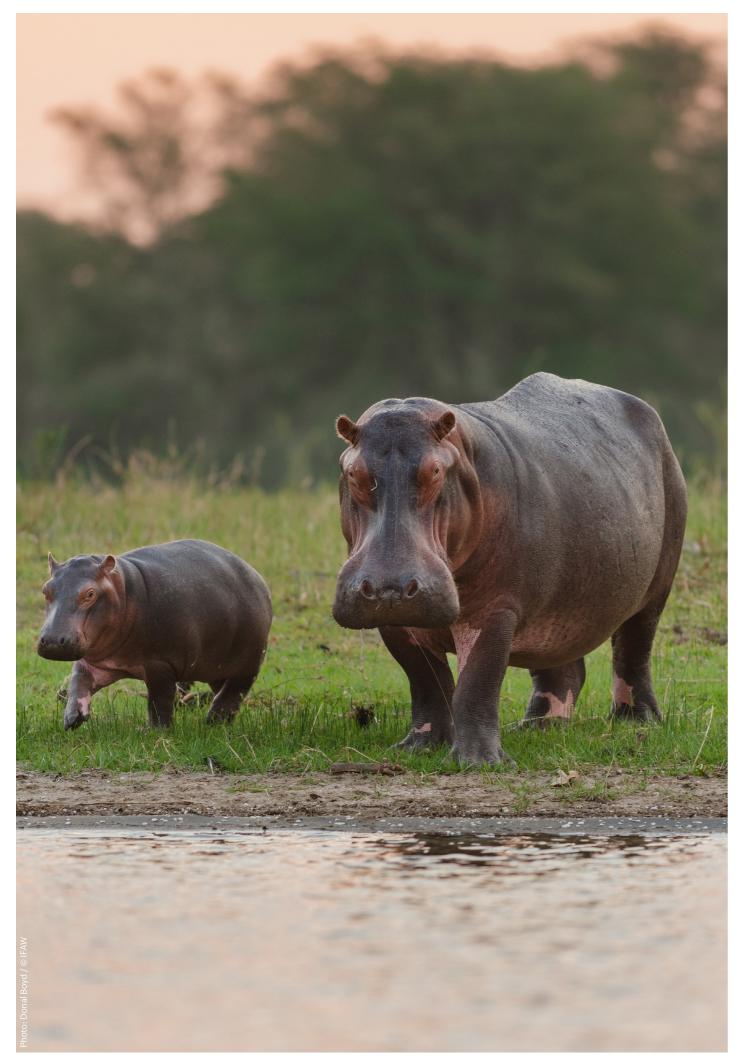
lacktriangle Ivory trade at flea market in Brussels (2017).

Comparison of ivory listings found on online marketplaces in 2021 and 2023 surveys



Comparison of ivory listings found on online marketplaces and on social media platforms in 2023





Conclusions

In the 2023 online marketplace survey, there were 32% fewer traders counted than in 2021, possibly indicating a move away from trading ivory, however, it was suggested that it may be too soon to confirm with certainty as there was the possibility of trade moving away from certain platforms to social media. Nonetheless, when the 2023 social media survey was carried out in accordance with this recommendation, it appeared that social media is currently not a large, overt channel for the illegal ivory trade. This is not to suggest it isn't used for other lucrative forms of illegal wildlife trade and trafficking and there are limitations in any snapshot study on trends, which cannot replace formal monitoring. While there were links to ivory sales on Pinterest, Facebook, Instagram, and Twitter, it was challenging to find them, and it often redirected the researchers to third-party websites like online antique marketplaces where the actual transactions would take place. In other terms, social media is more of a window for sellers to advertise their items.

➤ The number of traders has not reduced accordingly with the number of adverts because more traders in 2021 had over three adverts running. The highest number of adverts by one trader in 2021 was 41, while in the 2023 survey, it was 12.

- ▶ Five traders who were found to have had four or more adverts of ivory items in the 2021 survey were also found to advertise ivory items in the 2023 survey. All were found on antique auction sites, while on eBay and Esty, the traders were either no longer advertising ivory or were no longer advertising on the websites, at least not under the same trading name.
- There was no significant increase in the proportion of non-elephant ivory items offered for sale on online marketplaces and social media between 2021 and 2023.
- On social media platforms, elephant was the most commonly found ivory in searches, probably due to the majority of items being antique and the most commonly used material in those times.
- On social media platforms, 64% of adverts claimed that their items were antique by either providing the era they were from (e.g., Victorian or Edwardian) or simply stating they were antique, without referencing CITES or exemption certificates. Some adverts referred to pre-1947 or pre-CITES; however, only 8.8% of adverts contained exemption certificate numbers.

A decline is to be expected in the immediate wake of new legislation, so additional monitoring will be required to assess trends over time. Coordinated efforts from all stakeholders are still required to raise awareness and support effective enforcement in order to combat ivory trafficking.

66%

fewer adverts and 33% fewer specimens offered on online marketplaces

8.8%

of adverts contained exemption certificate numbers

Social media is more of a window for sellers to advertise their items



Engaging the private sector: an eBay and Etsy case study

As an illustration of our work with the private sector, IFAW reached out to eBay and Etsy in the context of this research to share with them the data collected, thereby supporting them in better combatting the illegal online ivory trade. IFAW continues to collaborate with them

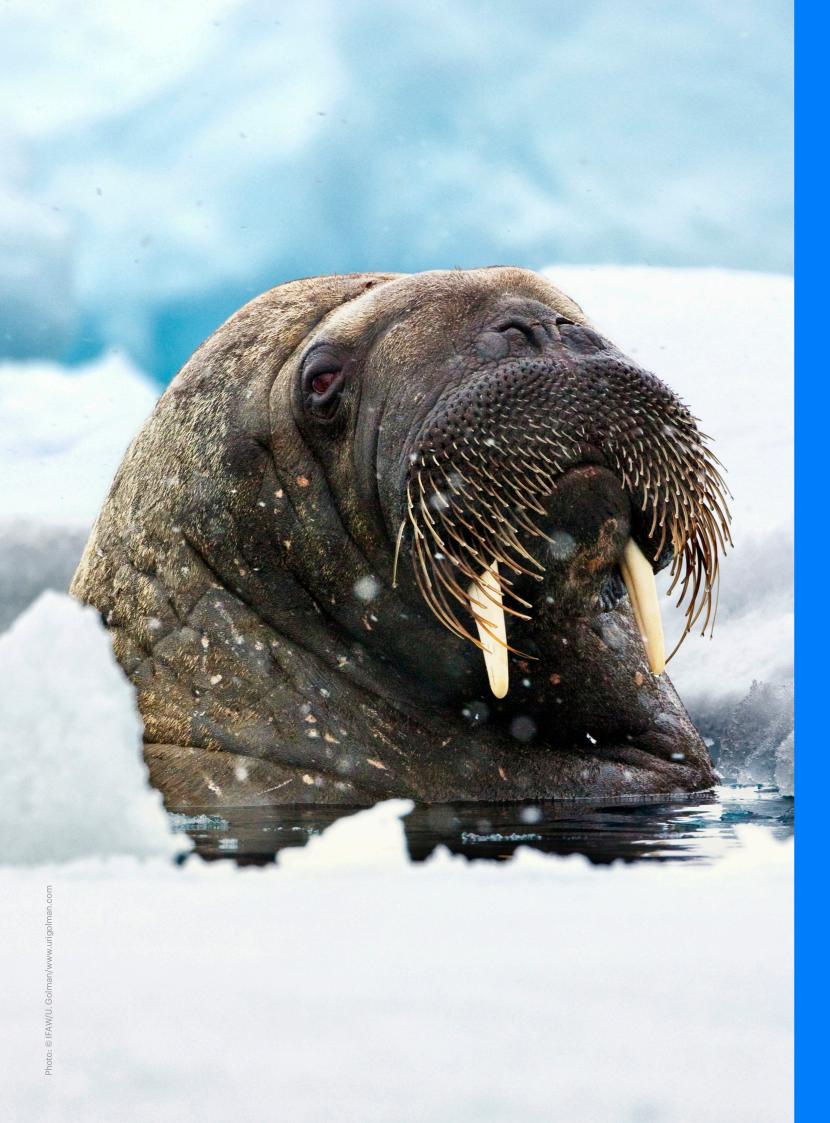
in relation to the work with the Coalition to End Wildlife Trafficking Online, www.endwildlifetraffickingonline.org/.

As part of the 103 items reported on eBay in the 2023 marketplace survey, 36 had already been removed by their security team, 12 had already been sold, and the remaining items brought to their attention were removed. These are part of the broader efforts by eBay to tackle wildlife cybercrime on their platform. In 2022, eBay blocked or removed more than 350,000 listings for endangered wildlife

Etsy has also been receptive to receiving more information of this type and is currently engaged in discussions with the Coalition to End Wildlife Trafficking Online to improve the efficiency of their current policies and enforcement efforts. Their efforts last year resulted in a total of 3,520 ivory listings being removed.

The findings in this report illustrate the substantial role and impact conservation policies can have when combined with efforts from the private sector and other key stakeholders.

- ▲ Carved ivory tusk.
- ◀ Hippopotamus with their young walking along the Shire River in Liwonde National, Malawi, during sunset.



Recommendations

Recommendations for government, industry, agencies, and the public



Recommendations to the UK Government:

- Implement the extension of the Ivory Act and continue to raise awareness among the general public about the ivory trade.
- Advise law-abiding citizens on what they can do with unwanted ivory to prevent it from re-entering the marketplace, i.e. surrender for disposal.
- Clarify what evidence of legality ivory traders should display in their online adverts (e.g., a picture of the certificate of exemption or a registration number).
- Support training of relevant enforcement agencies in identifying and prosecuting illegal ivory sales.

Recommendations to online marketplaces, antique auction sites, and social media platforms

- Recognise wildlife cyber-enabled crime as a serious crime, and allocate more resources to tackle it.
- Prioritise the monitoring of adverts using proactive tools to detect a greater range of search terms associated with ivory; remove suspicious listings, especially those that do not contain any reference to an exemption certificate; develop mechanisms allowing users to flag illegal content.
- Provide comprehensive messaging about conservation and the Ivory Act and display recurring warnings that inform users of the risks associated with purchasing illegal wildlife products.
- 4. Effectively respond to the threats posed by the online illegal wildlife trade, including ivory, by collaborating with all relevant stakeholders, including the Government, law enforcement agencies and civil society organisations (e.g. IFAW – TRAFFIC
- WWF via the Coalition to End Wildlife Trafficking Online,

www.endwildlifetraffickingonline.org/.)

Recommendations to civil society organisations:

- 1. Monitor trends of cyber-enabled illegal wildlife trafficking, including ivory, in the UK and across the world, working in partnership with NGOs and agencies. It will be important to understand long-term trends and any attempts to diversify into other trafficked products.
- Partner with and support law enforcement agencies globally to help them successfully investigate and prosecute the illegal ivory trade.

Recommendations to members of the public:

- Do not buy ivory. Whether items are on sale in a physical shop or online, avoid purchasing wildlife products, especially those illegally traded.
- 2. Report suspected illegal adverts. If you see content that looks suspicious and violates policies designed to prevent the sale of wildlife products, especially illegal products such as ivory items, report it immediately to the hosting platform and to the Coalition to End Wildlife Trafficking Online using this form:
- www.endwildlifetraffickingonline.org/report.
- ◀ Ivory trade at flea market in Brussels (2017).



Acknowledgements references, end notes & appendices



Acknowledgements

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▲ Ivory figurines.

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End notes

1 https://cites.org/en

Appendices

Appendix 1

2021 and 2023 survey results of online marketplaces and auction houses' websites

Online marketplaces and auction houses' websites	Number of adverts found	
	2021	2023
ukauctioneers.com	28	0
ebay.co.uk	142	103
ebid.net/uk	1	0
listia.com	1	0
the-saleroom.com	186	10
sellingantiques.co.uk	35	18
antiques-atlas.com	148	13
loveantiques.com	8	8
Antique Boutique	16	4
Etsy	62	55
Total	627	211

Appendix 2

2023 survey results of social media platforms

Social media platforms	Number of adverts found
Facebook	44
Pinterest	52
Instagram	8
Twitter	6
Snapchat	0
TikTok	0
Youtube	0
Total	110

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