

**The elephant in the net:
research snapshot of
the online ivory trade
after the adoption
of the new EU rules**





Photo: © IFAW-GRI

Vision:
Animals and people thriving together

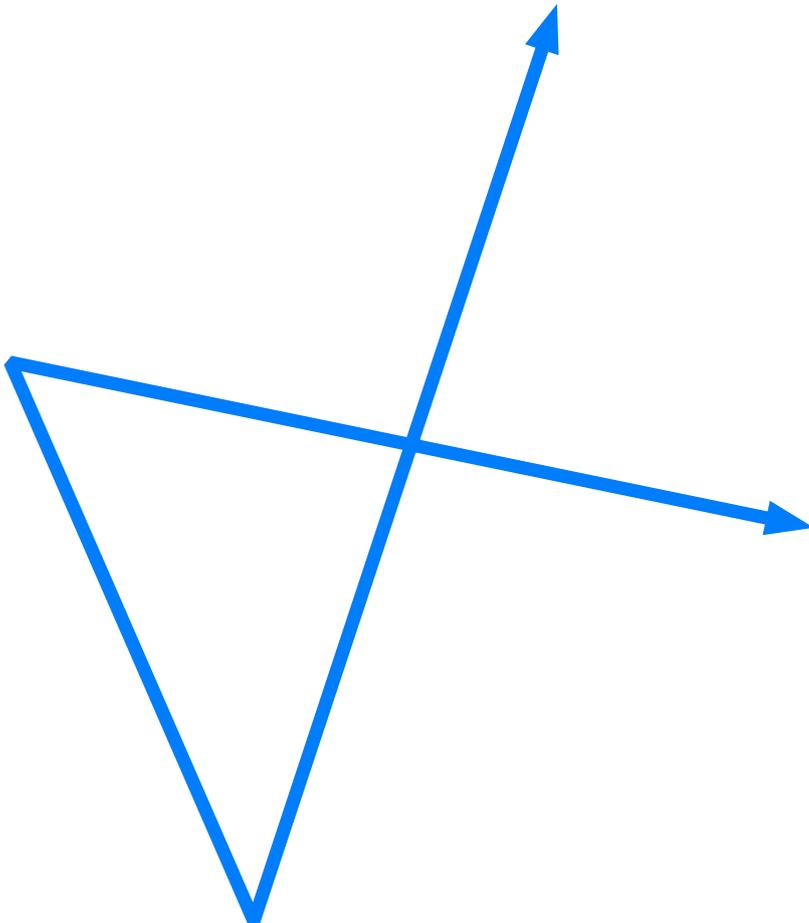


Photo: © IFAW

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

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About IFAW

The International Fund for Animal Welfare (IFAW) 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 partner with local communities, governments, non-governmental organisations, and businesses. Together, we pioneer new and innovative ways to help all species flourish. See how at ifaw.org.

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A big tusker in Amboseli National Park, Kenya.

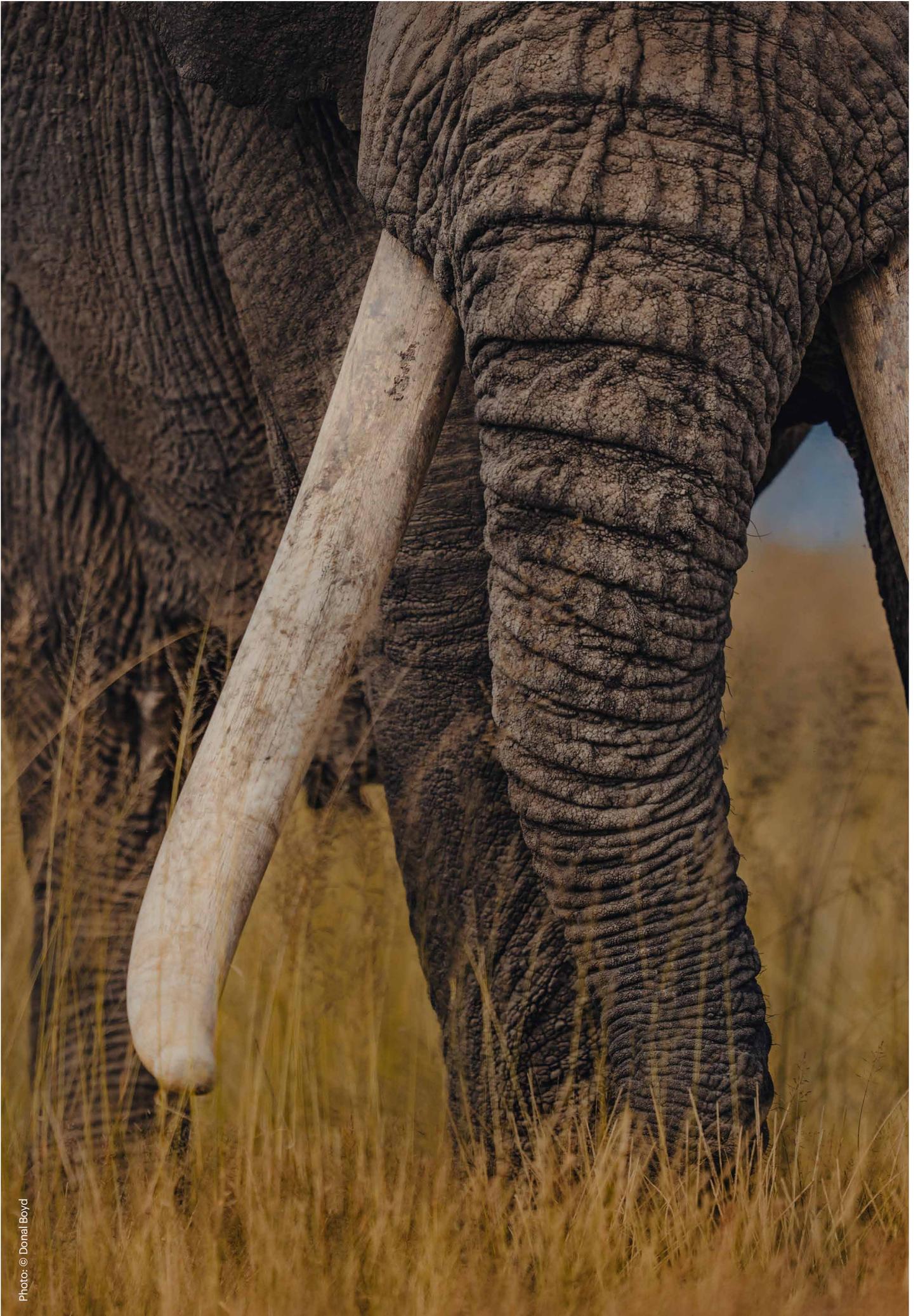


Photo: © Donal Boyd



Photo: Elisabeth Rossolin / IFAW

Executive summary

- ▶ In December 2021, IFAW welcomed the European Commission’s announcement of a revised regulation, which entered into effect in January 2022, and new guidance restricting trade in ivory, which was immediately implemented. These rules considerably reduce domestic ivory trade, as well as imports and re-exports of both raw and worked ivory, with very limited exceptions for antiques and musical instruments. Though these measures were and remain the European Union (EU)’s strongest so far, most of them are not legally binding, and they require implementation at the individual Member State level.
- ▶ In 2023, IFAW commissioned an independent researcher, MK Wildlife Consultancy, to assess the scope of the online ivory trade in the EU. The researchers analysed the quantity of ivory for sale on online marketplaces and auction house websites in seven relevant EU Member States: Belgium, France, Germany, Italy, Portugal, the

Netherlands, and Spain. Various search methods were used to test the market. Given that ivory comes from elephants and other protected species like narwhals or whales, the research also recorded which ivory-bearing species the advertised items came from.

- ▶ Results from the research show that significant amounts of ivory are still traded online in the EU. In only 23 days, 1,330 ivory and suspected ivory items were recorded for sale on 831 adverts across 49 online marketplaces and auction house websites. Verifiable evidence was provided for only 9.9% of worked ivory and suspected worked ivory specimens and 3.1% of raw ivory and suspected raw ivory specimens. No verifiable evidence of legality was provided for any of the 18 raw elephant ivory specimens found, which is highly suspicious considering that commercial imports, internal trade, and exports of raw elephant ivory from the EU are prohibited except for very strict

exemptions requiring proof of legality for intra-EU trade. Furthermore, two-fifths of the adverts offered extra EU trade, which is also very suspicious since commercial imports to and re-exports of ivory from the EU are not authorised, except for very narrow exemptions.

- ▶ Therefore, the research results suggest that despite the new EU rules, trafficking in ivory continues in the EU, and stricter, mandatory rules may be necessary.
- ▶ This research case study provides a methodology that can be helpful beyond the EU policy landscape to achieve expanded impact in the global fight against wildlife cybercrime.

▲ IFAW’s Céline Sissler-Bienvenu carries a large ivory tusk about to be crushed in Nice.

◀ Close-up of a big tusker in Amboseli National Park, Kenya.



Background



Photo: Sylvia Vandereydt / © IFAW

Ivory trade in the EU

Treasured since ancient times, ivory has been traded with and imported into Europe from Africa and Asia for thousands of years. African ivory flowed into the continent through the Mediterranean trade routes from the 15th to the 19th centuries, intensifying in the 17th century with the expansion of colonies and the slave trade. The increasing demand for this prestigious commodity used in the arts (e.g., religious objects, knife handles, piano keys, and billiard balls) led to an organised slaughter, resulting in a precipitous decline in the elephant population.

To halt this wholesale slaughter, the Convention on International Trade in Endangered Species (CITES) provided elephants with the highest level of protection—first to Asian elephants in 1975, and then to African ones (with the exception of the populations of Botswana, Namibia, South Africa and Zimbabwe which are included in CITES Appendix II), in 1989. A ban on international trade in elephant products, including all parts such as ivory, skin, leather, meat, and hair, went into effect in the 171 countries then party to the Convention, including the EU Member States. This measure is largely credited with saving both African and Asian elephants from the unsustainable commercial exploitation that was devastating entire populations and threatening the long-term survival of the world's largest land mammal.

Today, despite increased restrictions around the world, rules on ivory trade remain confusing and filled with loopholes, thus fuelling continued demand. Up until 2021, the EU was among the largest re-exporters

of legal ivory in the world. At the time, legal domestic ivory markets—even if limited and regulated—provided cover for criminals to launder illegal ivory, which was either re-exported to other countries or kept within Europe and sustained a demand leading to the senseless killing of elephants across Africa and Asia.

Although it is impossible to determine the full scale of the EU illegal ivory market, some recent estimates provide an overview: In 2017, IFAW research¹ on the scale of ivory seizures across Europe revealed that, between 2011 and 2014, some 4,500 ivory items were seized in Member States. Between January 2018 and December 2021, on average, there have been 315 annual seizures involving over 2,200 ivory items in the EU, equating to six ivory items seized per day². These figures only provide a partial account of the true size of illegal ivory trade; indeed, according to calculations³ from the United Nations Office on Drugs and Crime (UNODC), the interception rate of ivory is suggested to be between 17% and 40%, though UNODC suggests it is likely closer to only 17%.

A large part of the trade was taking place online. In 2013, INTERPOL's Project WEB⁴, the first international enforcement operation investigating the scale and nature of online ivory trade in Europe, identified 660 advertisements for ivory items during a two-week period on 61 internet auction house websites in nine European countries. In 2018, IFAW's research report *Disrupt: Wildlife Cybercrime*⁵ identified 949 ivory and suspected ivory specimens offered for sale during a six-week period in 2017 on 35 online

marketplaces and social media platforms in France and Germany, representing 21% of identified online wildlife trade in those countries in terms of the number of advertisements. In the same year, IFAW found 1,333 adverts for ivory items for sale in the Netherlands during a three-month period on 18 auction house websites⁶.

Despite a lack of transparency and consistency, and a reliance on limited public data, research clearly demonstrates that, whether directly or indirectly, a relevant number of EU Member States were still significantly contributing to the illegal ivory market in recent years.

In 2018, over 1 in 5 wildlife products traded online in Europe were ivory

▲ A huge ivory carving from a mammoth tusk on display inside a private owner's house in Brussels, Belgium.



Photo: © James St. John, CC BY 2.0

The new EU rules on ivory trade

Under CITES, international trade in elephant ivory is banned with strictly limited exemptions. Even if CITES does not regulate domestic (including intra-EU) trade in ivory, the agreement urged parties⁷ to implement comprehensive internal legislative, regulatory, enforcement, and other measures for ivory trade/domestic markets. In 2017, the European Commission adopted the first version of a guidance⁸ to suspend the re-export of raw ivory and, on December 16, 2021, published a revised guidance⁹ on the EU regime governing trade in ivory and amendments to its Regulation (EC) No 865/2006, which entered into effect in January 2022, aimed at effectively banning most forms of EU trade in elephant ivory. These rules apply to ivory from both African and Asian elephant populations.

An important milestone in the fight against elephant poaching and, more largely, wildlife crime, these measures followed

commitments made in the EU Wildlife Trafficking Action Plan and in the EU Biodiversity Strategy for 2030, as well as a public consultation¹⁰ that showed that 90% of the 90,000 respondents supported an EU ban on ivory trade.

With the new rules, commercial import of raw ivory is suspended, in addition to re-export. Furthermore, commercial intra-EU trade in raw and worked ivory items and the import and re-export of worked ivory items are no longer permitted, except for very limited cases that require close scrutiny and certificates or permits issued by competent authorities (see a full list of exemptions in the table below). However, most of these rules are not legally binding, and individual Member States must make the effort to implement them. Monitoring at all levels of implementation is thus crucial to ensure that shortcomings and lack of enforcement are promptly addressed.

90%

of Europeans support an EU ban on ivory trade.

▲ Narwhal ivory tusk from 1758 on display at the Warther Museum, Dover, Ohio.

Is commercial trade allowed?	Internal EU trade	Re-export from the EU	Import to the EU
Raw ivory	NO except if certificate issued for repairs of: ▶ pre-1975 musical instruments ▶ pre-1947 antiques held by museums	NO	NO
Worked ivory items	NO except if certificate issued for: ▶ pre-1975 musical instruments ▶ pre-1947 antiques	NO except if certificate issued for: ▶ pre-1975 musical instruments ▶ pre-1947 antiques sold to museums	NO except if permit issued for: ▶ pre-1975 musical instruments ▶ pre-1947 antiques sold to museums

Non-elephant ivory

Most people associate ivory with elephants, but other animals like the walrus, hippopotamus, narwhal, killer whale, sperm whale, or warthog also have tusks or teeth made of an identical chemical structure. The word ivory is commonly used to identify any mammalian tooth or tusk of commercial interest. The new strengthened EU rules on ivory only cover elephant ivory, but other ivory-bearing species are protected under the EU Wildlife Trade Regulations, more specifically through the Council Regulation (EC) No 338/97 on the protection of species of wild fauna and flora. As of 2023, all non-elephant ivory-bearing species, except the warthog, have a certain level of protection under this regulation.

Although trade for commercial purposes to, within, and from the EU in most non-elephant ivory-bearing species is regulated, it isn't as strictly limited as trade in elephant ivory. However, in most cases, distinguishing the species of origin from online advertisements is very complex. Having legal trade in non-elephant ivory

risks enabling the trade of elephant ivory under the guise of other permitted species. This may also put pressure on wild populations of these non-elephant species due to overall demand and to replace strictly regulated elephant ivory. Facing similar risks, the United Kingdom Government announced in May 2023 that its Ivory Act would be extended beyond elephant ivory to cover five other ivory-bearing species (killer whale, narwhal, sperm whale, hippopotamus, and walrus).

Another increasingly common elephant ivory substitute is mammoth ivory. Although woolly mammoths became extinct more than 10,000 years ago, in cold regions like Siberia, carcasses preserved in ice are now becoming accessible as ice melts due to climate change and/or are being actively targeted for their ivory. Differences between woolly mammoth tusks and those of elephants are not easily visible to the naked eye. Some traders are suspected of selling elephant ivory mislabelled as mammoth specimens.

Legal trade in non-elephant ivory increases the risk of illegal elephant ivory laundering

IFAW's holistic approach to combat a global illegal trade

The rules adopted by the European Commission to restrict ivory trade constitute a significant achievement. They demonstrate that the EU has finally taken responsibility for its role in the death of thousands of elephants caused by the ivory trade.

However, the fight against elephant poaching and illegal ivory trade goes beyond the EU and requires more than policy changes. IFAW collaborates with online platforms across the globe to remove suspicious wildlife listings or posts, supports law enforcers' ability to target wildlife criminals, and mobilises the public to do their part to stop wildlife trafficking online by, for example, discouraging undesirable behaviours such as the purchase of wildlife or wildlife products through targeted, contextually appropriate initiatives. Through partnerships, we support networks of rangers, community members, and professionals around the world to disrupt wildlife trafficking at every stage of the supply chain, both online and offline, and protect wildlife.

◀ Ivory objects being loaded into the machine bucket prior to crushing, at an ivory destruction event.



Photo: Elisabeth Perotin / © IFAW

Assessing the online ivory trade in the EU



Photo: Elisabeth Perotin / © IFAW

Methodology

In May and August 2023, IFAW commissioned MK Wildlife Consultancy—an expert researcher in wildlife crime—to conduct two rounds of open-source research into online marketplaces and auction house websites. The purpose was to determine the quantity of ivory and suspected ivory from relevant ivory-bearing species (i.e., elephant, hippo, walrus, whale, narwhal and dugong) that was being advertised online in the EU a year and a half after the new EU rules on ivory trade came into effect. Platforms operating in seven relevant countries chosen for their assumed substantial ivory markets were screened. The first round of research covering France, Belgium, and the Netherlands was completed in 10 days, and the second round covering Italy, Germany, Spain, and Portugal was completed in 13 days.

Various search methods were used to inspect the market. The research included ivory and suspected ivory items or traders based in the target countries. It also included traders located elsewhere but offering items in the target countries. Adverts were counted

as selling ivory if the characteristics showed the item to be ivory of one of the target species and counted as selling suspected ivory if the advert claimed the item was ivory but there were no visible characteristics to confirm it, or if there was any other reason to suspect ivory. The presence/absence of certificates or permits for pre-1947 antiques or pre-1975 musical instruments and the authority who released them was recorded when possible. Items already sold but with active online advertisements were recorded for some websites, such as auction house websites, where most ivory and suspected ivory items weren't available.

Due to time constraints, screening all potentially relevant websites and recording every ivory advert found online was not possible in this study. Instead, the research focused on websites that were identified to be hosting relevant adverts for ivory in previous research. To maximise time efficiency, for websites with large numbers of adverts, researchers first estimated the approximate number of potentially relevant adverts on each website, then recorded a sample of the adverts on each website to

ensure that all websites were equally searched. Researchers spent equal amounts of time for each country, regardless of the number of websites in each country. We believe the results represent what is proportionally offered online in the seven countries.

Data protection

The methodology and parameters of the research were based on those set for previous IFAW research, and local data protection legislation was taken into account. Researchers complied with the EU General Data Protection Regulation 2016/679 (GDPR) principles relating to the processing of personal data (Art.5 GDPR). To comply with each of the seven countries' specific legislation, a different lawful basis for processing data was identified and documented in each country.

▲ Ivory objects before destruction.

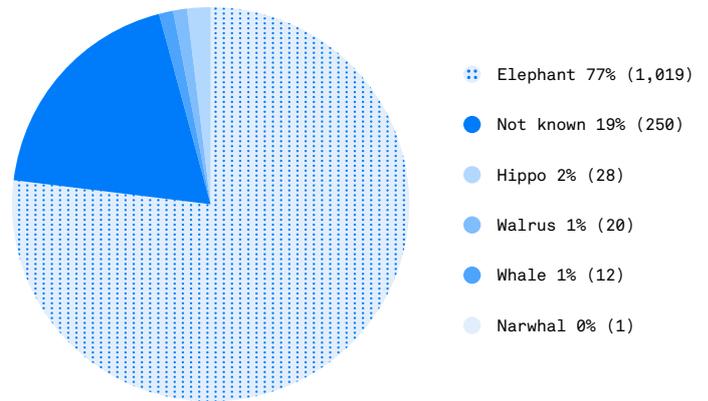
Results

Due to time constraints, the below data on recorded adverts is only a snapshot, such that the total number of adverts potentially selling ivory items would be much higher than the number of adverts recorded here.

No of ads	831
Specimens for sale	1,330
No of online platforms	49
Ads offering extra-EU trade	343 (41.3%)
Ads with a reference to legality	596 (71.7%)
Ads without proof of legality	756 (91%)
Ads with proof of legality	75 (9%)
Most traded species ¹	Elephant (1,019)
Most traded form of ivory ¹	Worked ivory (1,298)
No of raw ivory ¹	32
No of species traded	5

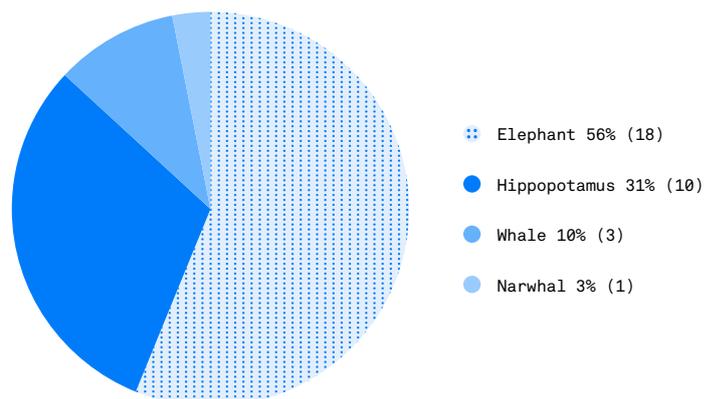
¹By number of specimens.

Species in the trade



Adverts for elephant ivory and suspected elephant ivory far outnumbered (77%) all the other types of ivory. The second largest group contained adverts where the exact species could not be determined, mainly due to the poor quality of the images.

Species share of raw ivory by number of specimens



Mammoth ivory

After the first round of research on France, Belgium, and the Netherlands, the researchers decided to include mammoth as a target species in the second round of research in Italy, Germany, Spain, and Portugal, as there were concerns that elephant ivory was mislabelled as mammoth. Figures for mammoth ivory are not included in the above chart, which gathers data for species that were searched in all countries.

No adverts labelled as 'mammoth ivory' were found in Italy, while 2 adverts were found in Portugal, 16 in Spain, and 10 in Germany. Of these 28 adverts, 3 were positively identified as offering elephant ivory, 1 as hippo ivory, and 14 as mammoth (for a total of 84 specimens). In 10 adverts, it was impossible to identify the species of origin from the images provided.

Some 4.6% of the adverts found in Italy, Germany, Spain, and Portugal were labelled as 'mammoth ivory', only half of which were actual mammoth ivory. From the images, it was possible to establish that elephant ivory was mislabelled as mammoth in 0.5% of all the adverts found in Italy, Germany, Spain, and Portugal. However, the species of origin could not be identified in 35% of the adverts labelled as mammoth ivory. Therefore, whether significant amounts of elephant ivory are sold as mammoth ivory is difficult to determine.

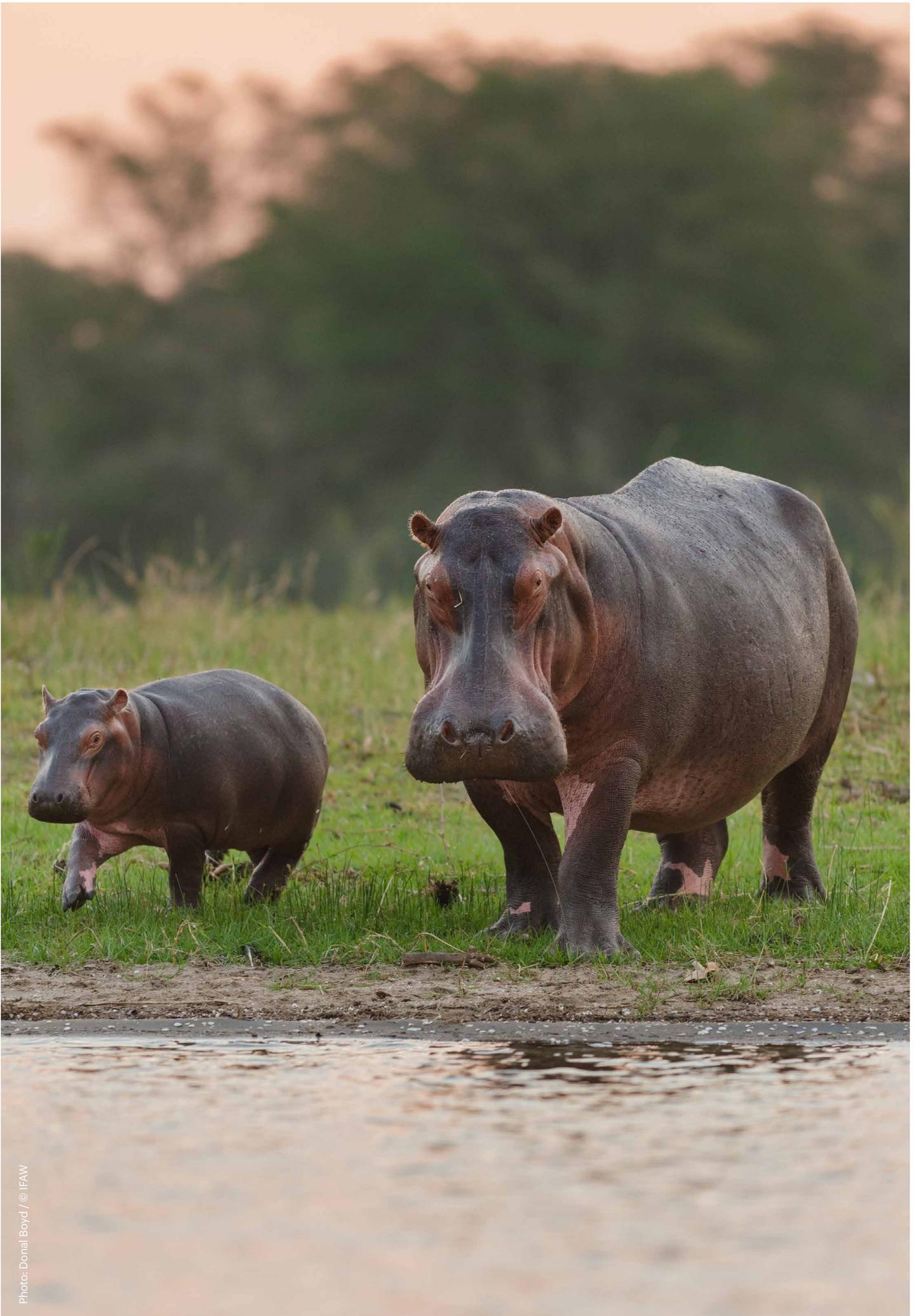


Photo: Donal Boyd / © IFAW

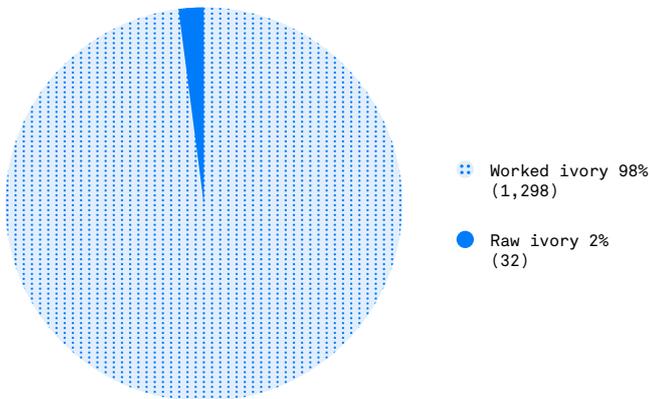
Types of ivory products

Almost all (98%) of the ivory and suspected ivory items recorded for sale were worked, as defined by the European Commission's guidance: 'ivory that has been carved, shaped or processed, either fully or partially', which does 'not include whole tusks in any form, except where the whole surface has been carved'. The number of raw ivory and suspected raw ivory specimens recorded (32), especially elephant raw ivory and suspected raw ivory specimens (18), is nonetheless concerning as commercial imports, internal trade, and exports of raw elephant ivory from the EU are prohibited except for very strict exemptions for intra-EU trade.

Sellers can—and are sometimes requested to—place their products under certain categories on online marketplaces and auction house websites. The most used product description categories for adverts of ivory items recorded in our research were 'sculpture', 'other', 'miniature paintings', 'jewellery', and 'netsuke'. The numbers of items recorded are shown in the table below:

32 raw ivory specimens were recorded, including 18 from elephants

Forms of ivory share of total by specimens



Product Description	Adverts	Specimens
Sculpture	342	454
Other	135	303
Miniature painting	129	160
Jewellery	80	94
Netsuke	59	87
Tooth / Tusk	22	35
Cutlery	18	145
Letter opener / Page turner	13	18
Walking stick	11	12
Fan	10	10
Inlay	6	6
Puzzle ball	3	3
Scrimshaw	2	2
Glove stretcher	1	1
Total	831	1,330

Miniature paintings were one of the most numerous in adverts. These largely 18th and 19th century paintings were often painted on an ivory background. This made visual identification of species difficult. They were recorded based on the age of the portraits and statements in the adverts that the miniatures were painted on ivory.

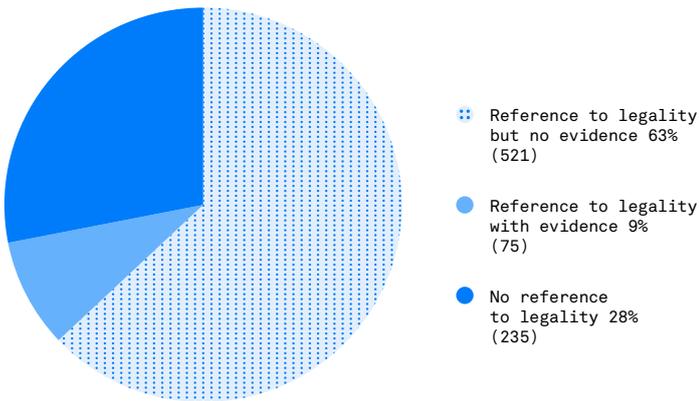
◀ Hippopotamus with their young walking along the Shire River in Liwonde National, Malawi, during sunset.

◀ A miniature watercolor on ivory portrait of Princess Caroline Matilda of Great Britain, Queen of Denmark, created in 1848 by Johannes Heinrich Ludwig Möller after Peder Als.



Legality claims and evidence

Reference to legality and presentation of evidence share of total by adverts



Approximately 72% (596) of all adverts referred to some form of legality, for example, claiming that their items were antique or from a period dating before 1947, that they had a relevant permit, or just by quoting legal references like the word 'CITES'. Of those, only 12.6% (75) provided verifiable evidence to support the claim, such as a CITES certificate number, a certificate of origin or authenticity, or a scan of relevant documents. This equates to only 9% of the total number of adverts (831).

Only 9% of the adverts provided verifiable evidence of legality

No verifiable evidence of legality was provided for any of the 18 raw elephant ivory specimens

Belgium was by far the country with the highest proportion of verifiable evidence provided, while in the Netherlands and Italy, not even one piece of verifiable evidence was given. No evidence of legality was provided for any of the 18 raw elephant ivory specimens found, which is highly suspicious considering that commercial imports, internal trade, and exports of raw elephant ivory from the EU are prohibited except for very strict exemptions requiring proof of legality for intra-EU trade. Overall, verifiable evidence was provided for 9.9% of worked ivory and suspected worked ivory specimens and for 3.1% of raw ivory and suspected raw ivory specimens. When considering only elephant ivory, for which the EU rules are stricter in terms of trade, verifiable evidence was provided in only 9.7% of all the adverts.



Photo: Elisabeth Perotin / © IFAW

Websites

The results from the websites screened were as follows:

Number of recorded adverts per website and per country

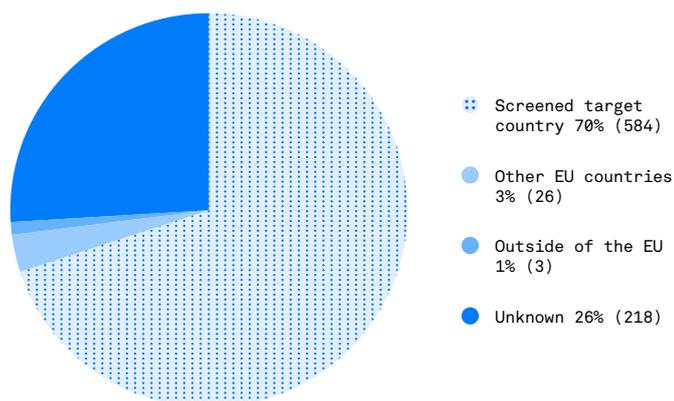
Germany		Spain		Portugal		Italy		Belgium		Netherlands		France	
Catawiki	1	Todocoleccion	67	artbid.pt	1	arsantiquarsi.it	6	bernaerts.eu	10	catawiki.com/nl	10	aguttes.com	9
Ebay	37	Catawiki	2	cml.pt	19	bakeca.it	10	carlobonte.be	8	Ebay	3	antikeo.fr	3
Etsy	12	Ebay	18	custojusto.pt	54	bertolamifineart.com	9	delcampe.net	3	Etsy	6	antiques-delaval.com	4
henrys.de	4	Etsy	8	olx.pt	28	cambiaste.com	6	Etsy	4	marktplaats	28	auktion.fr	4
Historia	20	Invaluable	1	renascimento-sa.pt	9	ebay.it	24	loeckx.be	1			drouot.com	34
Invaluable	1	liveauctioneers.com	3	tagusart.com	1	etsy.it	6	2ememain.be	4			ebay.fr	75
kleinanzeigen.de	59	Milanuncios	12	en.todocoleccion.net	0	proantic.it	34	Ebay	1			etsy.com	18
markt.de	3	subastassegre.es	1	Ebay	0	subito.it	20					interencheres.com	3
mehlis.eu	4	templumauctions	15	Etsy	0							legrenierdaugustine.com	2
oldthings.de	27	wallapop	13	catawiki.com	0							naturabuy.fr	2
quoka.de	1			leiloeiracortereal.pt	0							paruVendu.fr	1
thesaleroom.com	46											primardeco.com	1
												proantic.com	10
												tajan.com	5
Total	215	Total	140	Total	112	Total	115	Total	31	Total	47	Total	171

Geographic scope

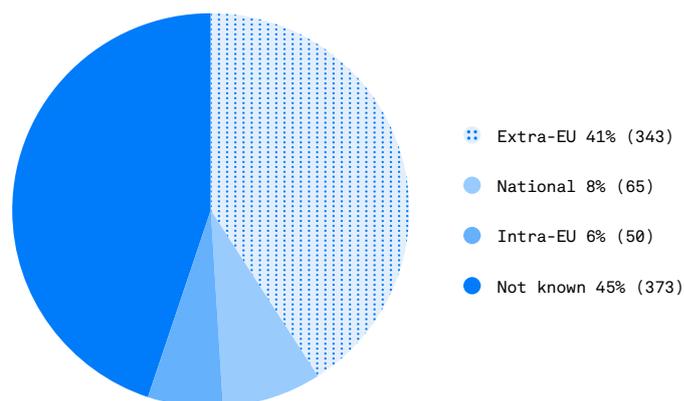
Although a large majority (73%) of the recorded sellers were located in the EU, 41% offered extra-EU trade (international shipping option enabled). This is highly suspicious considering that commercial imports to and re-exports of ivory from the EU of ivory are not authorised, except for very narrow exemptions (pre-1975 musical instruments and antiques sold to museums).

At least 41% of the sellers offered extra-EU trade

Seller's location



Offered shipping region



Furthermore, it was not possible to determine whether sellers offered national, intra-EU, or extra-EU trade in 45% of the adverts (this information is not systematically displayed on adverts and would have required additional steps, e.g., creating an account, which fell out of the research scope). Therefore, it is possible that an even larger portion of the adverts offered extra-EU trade.

◀ Ivory being loaded into the machine bucket before destruction.

Country case studies

Belgium

Background

Due to its links with former colonies and its central location offering good flight and port connections, Belgium has previously appeared to be a key player in the ivory trade. One of the main reasons King Leopold II of Belgium turned Congo—now known as the Democratic Republic of the Congo—into his own personal fief in the late 19th century was to extract ivory¹¹. Between 1989 and 1992, Belgium was considered a global hub for the ivory trade between African producer countries and Asian consumer countries, with several hundred ivory objects on sale in large Belgian cities such as Brussels, Antwerp, and Ghent¹². During our 2017 research on the scale of ivory seizures across Europe¹, we found records of more than 200 seizures reported between 1996 and 2016, with nearly 240 kilograms of raw ivory and 3,400 worked ivory items recovered by customs authorities. Belgian authorities reported to CITES that elephant ivory was one of the most seized items by police forces between 2007 and 2016¹³. According to a study published in 2018 by Avaaz¹⁴, radiocarbon testing showed that 57% of the ivory pieces purchased in Belgium and tested were fake antiques being sold illegally.

Results

Belgium is the country where the smallest number of ivory and suspected ivory items was recorded (31 adverts for 40 specimens). Nearly all the ivory and suspected ivory advertised for sale came from elephants (95%), and all of it was worked (no raw ivory was found). A large majority of the adverts (84%) on the websites claimed the item for sale was made from ivory, and over half of them (52%) gave proof of legality. Verifiable evidence was provided for 60% of the specimens (all are worked ivory and suspected worked ivory). When considering only elephant ivory, verifiable evidence was provided for 52% of the adverts and for 63% of worked elephant ivory and suspected worked elephant ivory specimens.

No of ads	31
Specimens for sale	40
No of online platforms	9
Ads offering extra-EU trade	5
Ads with a reference to legality	25
Ads without proof of legality	15
Ads with proof of legality	16
Most traded species ¹	Elephant (38)
Most traded form of ivory ¹	Worked ivory (40)
No of raw ivory ¹	0
No of species traded	2

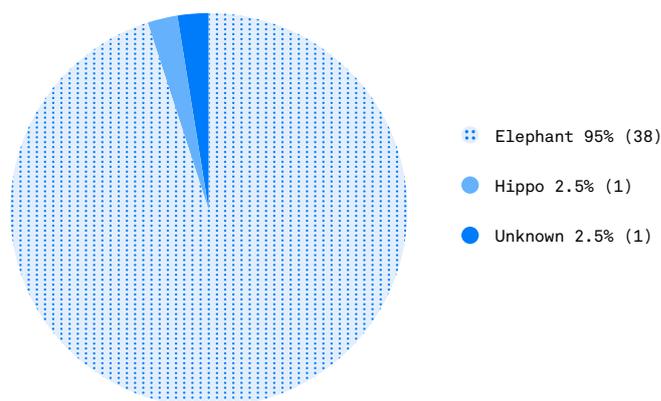
95%

of the ivory advertised for sale came from elephants.

All the ivory recorded was worked (no raw ivory was found for sale)

Half of the ads provided verifiable evidence of legality

¹By number of specimens.

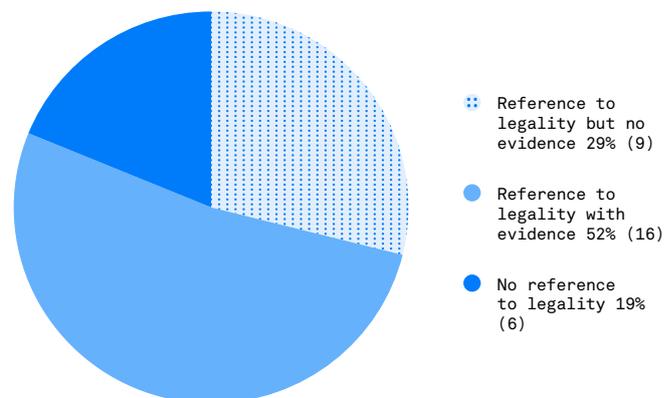


Product description categories

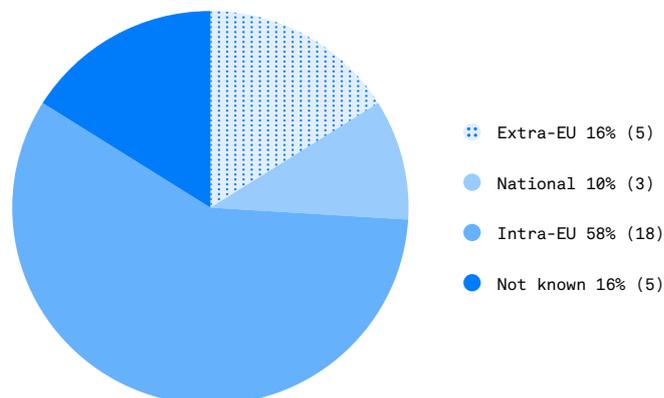
Category	Adverts	Specimens
Sculpture	20	28
Other	4	4
Netsuke	3	3
Cutlery	2	3
Miniature painting	1	1
Walking stick	1	1
Total	31	40



Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



◀ Ivory female anatomical figure from Germany, produced between the 17th-19th centuries.

France

Background

According to Esmond Martin and Daniel Stiles, there were several waves of elephant ivory imports to France throughout history, with early pieces brought by Romans in the 2nd century B.C.¹⁵. From the 13th century, there was a growing influx of ivory in the country, fuelled by artistic demand. Along with Paris, the northern city of Dieppe emerged as a centre of European ivory carving¹⁶ after some local merchants established trading posts on the western African coast and shipped ivory back home. A few centuries later, France was still a hub in the European and global ivory trade, as demonstrated in our 2017 research¹ on ivory seizures in Europe between 2006 and 2015. The country was then a major transit route in the illegal ivory trade and a destination country. In 2014, in the span of only two months, IFAW recorded¹⁷ 1,774 lots of raw and worked ivory equivalent to over two tons of ivory for sale on auction house websites. Despite a near-total ivory ban in 2016, ivory and suspected ivory were by far the most numerous products identified through our 2018 research⁵ on online platforms operating in France. Some 738 specimens were offered over 532 advertisements, equating to 46% of all the advertisements and posts recorded in the country. According to a study published in 2018 by Avaaz¹⁴, radiocarbon testing showed that 86% of the ivory pieces purchased in France and tested were fake antiques being sold illegally.

Results

Of the 171 adverts recorded in France, one offered three raw hippopotamus ivory specimens, while the rest consisted of worked ivory and suspected worked ivory specimens. Almost half of the adverts (48.5%) openly claimed the item for sale was made from ivory. While over three-quarters of the adverts recorded referred to legality, only 4.1% provided verifiable evidence. Verifiable evidence was provided for 3.1% of worked ivory and suspected worked ivory specimens and 0% of raw ivory and suspected raw ivory specimens. When considering elephant ivory only, verifiable evidence was provided for 3.9% of the adverts and for 3% of worked elephant ivory and suspected worked elephant ivory specimens.

Almost half of the adverts openly claimed the item for sale was ivory

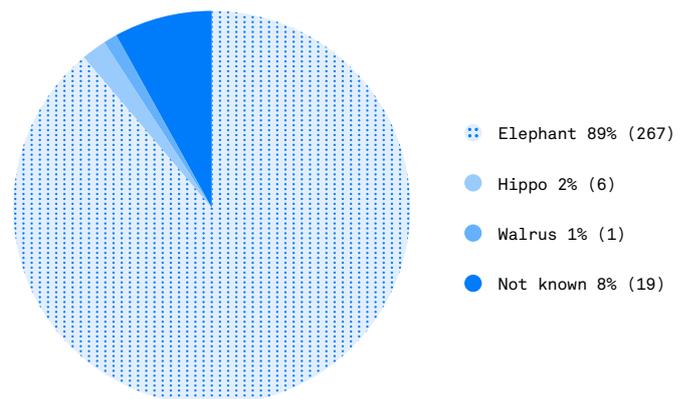
Over half of the items were available for sale outside of the European Union

4.1%

of all the adverts provided verifiable evidence of legality.

No of ads	171
Specimens for sale	293
No of online platforms	15
Ads offering extra-EU trade	87
Ads with a reference to legality	132
Ads without proof of legality	164
Ads with proof of legality	7
Most traded species ¹	Elephant (267)
Most traded form of ivory ¹	Worked ivory (290)
No of raw ivory ¹	3
No of species traded	3

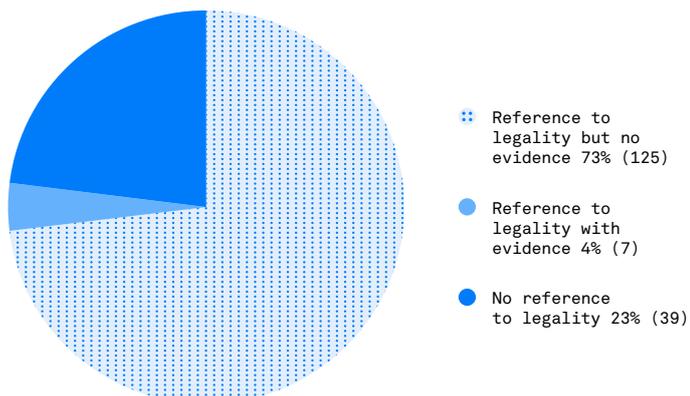
¹By number of specimens.



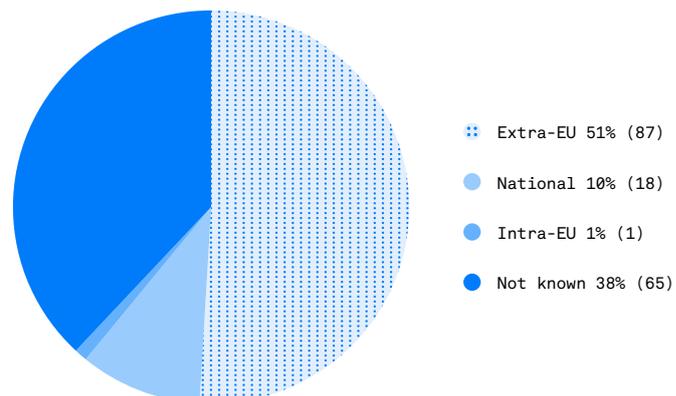
Product description categories

Category	Adverts	Specimens
Sculpture	78	96
Miniature painting	30	36
Other	28	38
Jewellery	16	19
Cutlery	8	86
Letter opener / Page turner	2	7
Fan	2	2
Netsuke	2	2
Walking stick	2	2
Tooth	1	3
Scrimshaw	1	1
Glove stretcher	1	1
Total	171	293

Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



Germany

Background

Germany is historically known for its fine ivory carving. A centre of this industry, the town of Erbach counted hundreds of craftsmen who specialised in ivory from the middle of the 18th century. Three centuries later, in 2004, the country was identified as the largest ivory market among five European countries¹⁵. According to a rough analysis by the German government¹⁶, between 1996 and 2016, German customs authorities seized and confiscated about 200 tusks and 6,700 ivory carvings. With its international airports acting as airfreight hubs, the country was the top European destination for ivory seized in terms of weight between 2005 and 2014¹⁹, and appeared to be a common transiting route between Western and Central Africa to East and Southeast Asia²⁰. In our 2018 investigation of online wildlife trade in four European countries, we identified 172 advertisements and posts offering 211 ivory and suspected ivory items for sale in Germany, a much higher number than what we had previously counted in similar research conducted in 2014²¹. According to a study published in 2018 by Avaaz¹⁴, radiocarbon testing showed that 56% of the ivory pieces purchased in Germany and tested were falsely labelled as antiques and were thus illegally sold.

Results

Of the 215 adverts recorded in Germany, two offered a total of two raw ivory specimens (one from a narwhal, and one from a whale), while the rest consisted of worked ivory and suspected worked ivory specimens. Over 44% of the adverts (96) openly claimed the item for sale was made from ivory. In 70% of the adverts, sellers referred to legality, but only 13% of the adverts provided verifiable evidence. Verifiable evidence was provided for 16.6% of worked ivory and suspected worked ivory specimens and 50% of raw ivory and suspected raw ivory specimens. When considering elephant ivory only, verifiable evidence was provided for 15.4% of the adverts and for 19.2% of worked elephant ivory and suspected worked elephant ivory specimens.

No of ads	215
Specimens for sale	430
No of online platforms	12
Ads offering extra-EU trade	94
Ads with a reference to legality	151
Ads without proof of legality	186
Ads with proof of legality	29
Most traded species ¹	Elephant (365)
Most traded form of ivory ¹	Worked ivory (428)
No of raw ivory ¹	2
No of species traded	5

Ivory items from at least 5 species were recorded, including 10 specimens from walrus

44%

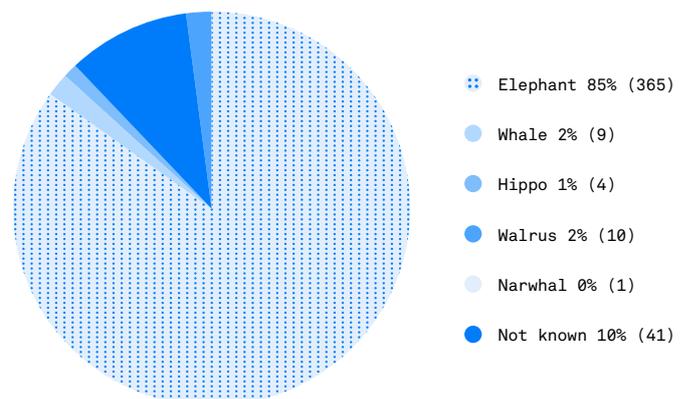
of the items were available for sale outside of the European Union.

13%

of all the adverts provided verifiable evidence of legality.

► Ivory objects before destruction.

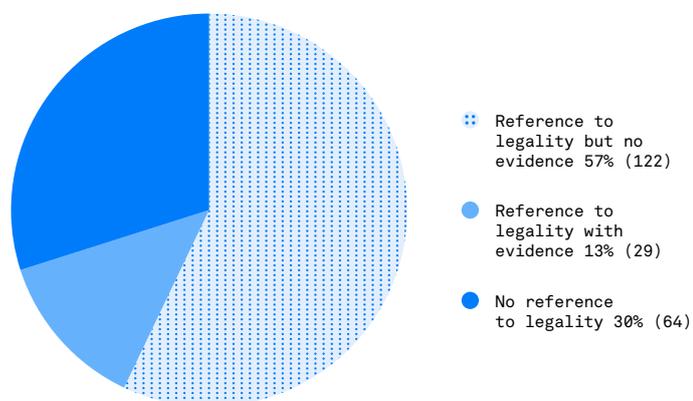
¹By number of specimens.



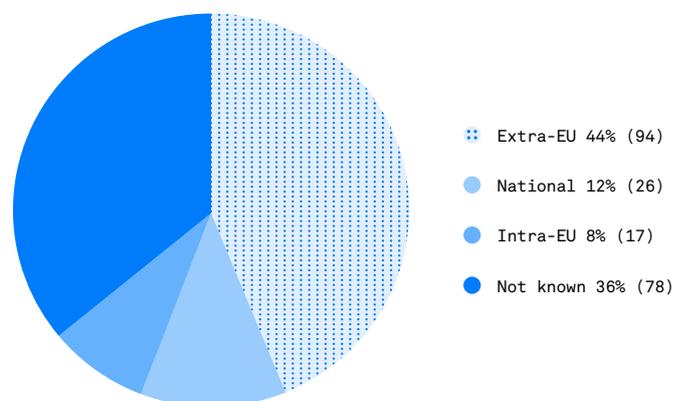
Product description categories

Category	Adverts	Specimens
Other	61	193
Miniature painting	49	66
Jewellery	35	38
Sculpture	29	34
Netsuke	23	33
Cutlery	6	52
Fan	4	4
Walking stick	4	4
Tooth / Tusk	3	5
Scrimshaw	1	1
Total	215	430

Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



Italy

Background

Via trade routes such as the Red Sea and the central Mediterranean, ivory has been imported to Italy since the Middle Ages²², thanks to its favourable location between Africa and Europe. Based on our 2017 research¹, Italy did not appear to have reported a major quantity of ivory seizures between 2006 and 2015. However, in 2015, the country occupied the top spot of the largest legal ivory exporters to Hong Kong²³. Besides, according to a study published in 2018 by Aavaaz¹⁴, radiocarbon testing showed that 100% of the ivory pieces purchased in Italy and tested were fake antiques being sold illegally.

Results

Of the 115 adverts recorded in Italy, two offered a total of three raw hippopotamus ivory specimens, while the rest consisted of worked ivory and suspected worked ivory specimens. Almost two-thirds of the adverts (64.4%) openly claimed the item for sale was made from ivory. Although 83% of the adverts referred to legality, not one piece of verifiable evidence was provided in the recorded adverts.

No of ads	115
Specimens for sale	156
No of online platforms	8
Ads offering extra-EU trade	35
Ads with a reference to legality	95
Ads without proof of legality	115
Ads with proof of legality	0
Most traded species ¹	Elephant (95)
Most traded form of ivory ¹	Worked ivory (153)
No of raw ivory ¹	3
No of species traded	3

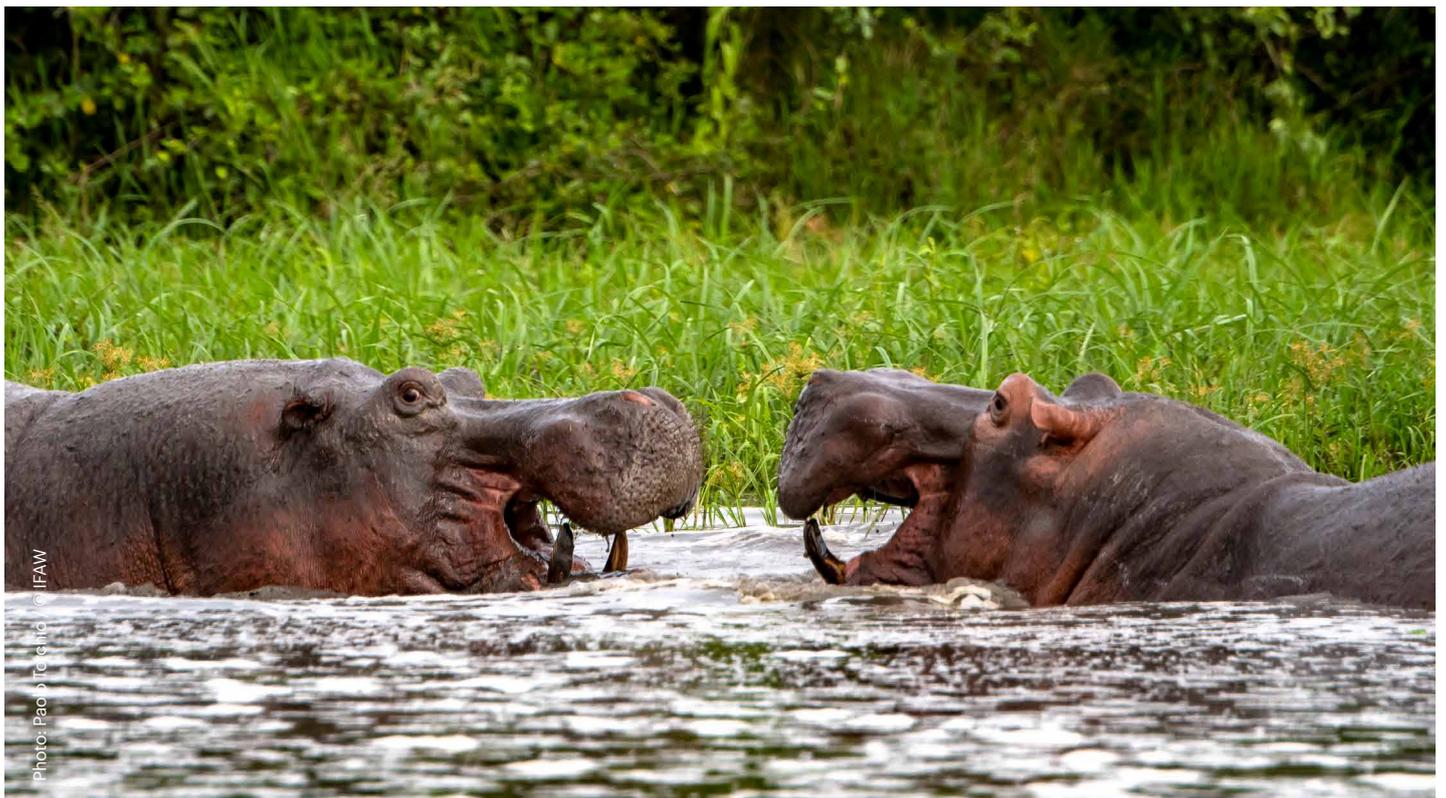
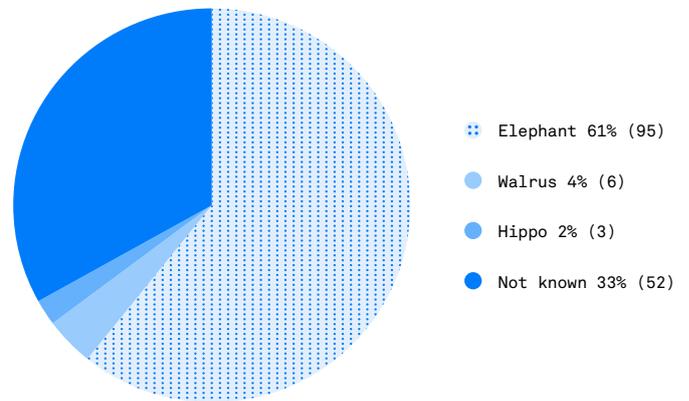
Ivory items from at least 3 species were recorded, including 6 specimens from walrus

30%

of the items were available for sale outside of the European Union.

Not a single piece of verifiable evidence of legality was provided

¹By number of specimens.

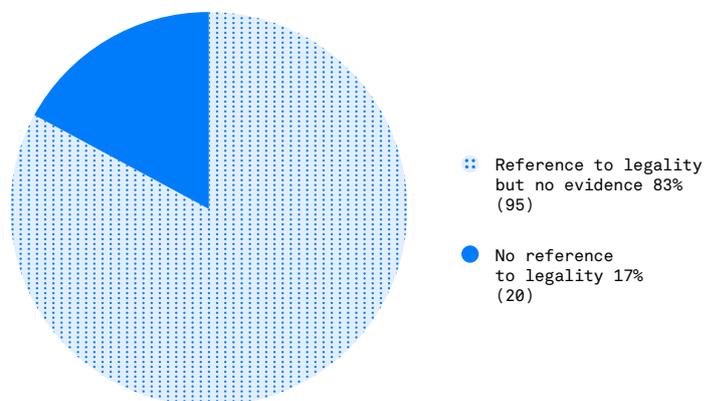


Product description categories

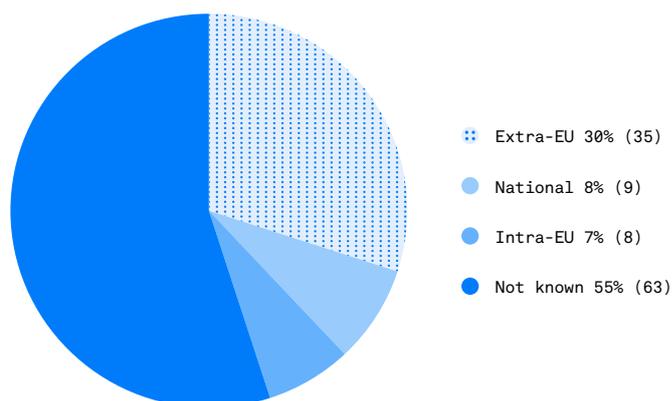
Category	Adverts	Specimens
Sculpture	76	101
Netsuke	14	27
Miniature painting	13	13
Other	7	8
Jewellery	2	4
Letter opener / Page turner	2	2
Cutlery	1	1
Total	115	156



Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



▲ Recovered wildlife product trophies from a wildlife security operation in Western Uganda along the border with the Democratic Republic of Congo.

◀ Hippos in water, Queen Elizabeth National Park, Uganda.

Netherlands

Background

In the 17th and 18th centuries, known as the 'Dutch Golden Age', Dutch merchants imported large quantities of elephant ivory from West Africa to the Netherlands—an activity frequently intertwined with the slave trade²⁴. Based on archival research, Henk den Heijer estimated that the Dutch West India Company imported about 1,340 tons of ivory from the Gold Coast between 1675 and 1731²⁵. According to Marloes Rijkelijhuizen, this ivory was either crafted into objects like combs or knife handles or re-exported, mainly to Asia²⁶. Three centuries later, although Dutch authorities made efforts to eliminate illegal ivory trade¹, the country is still one of the European countries with a significant role in this trade. In 2018, in the span of only three months, IFAW discovered⁶ 1,310 adverts for elephant ivory items for sale in the Netherlands on 18 auction house websites. Over half of the adverts (57%) did not provide proper documentation. According to a study published the same year by Avaaz⁴, radiocarbon testing showed that over two-thirds (68%) of the ivory pieces purchased in the Netherlands and tested were fake antiques being sold illegally.

Results

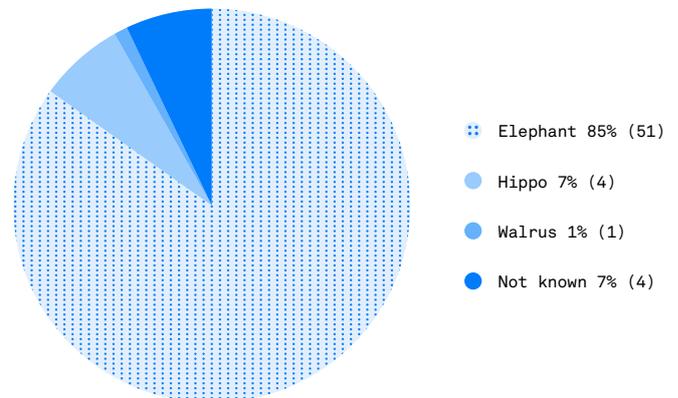
Of the 47 adverts recorded in the Netherlands, one offered four raw hippopotamus ivory specimens, while the rest consisted of worked ivory and suspected worked ivory specimens. Almost three-quarters (74.5%) of the adverts openly claimed the item for sale was made from ivory. Although 85% of the adverts referred to legality, not one piece of verifiable evidence was provided in the recorded adverts.

No of ads	47
Specimens for sale	60
No of online platforms	4
Ads offering extra-EU trade	10
Ads with a reference to legality	40
Ads without proof of legality	47
Ads with proof of legality	0
Most traded species ¹	Elephant (51)
Most traded form of ivory ¹	Worked ivory (56)
No of raw ivory ¹	4
No of species traded	3



Photo: © Michael Murphy

¹By number of specimens.



Ivory items from at least 3 species were recorded, including 4 specimens from hippopotamus

21%

of the items were available for sale outside of the European Union.

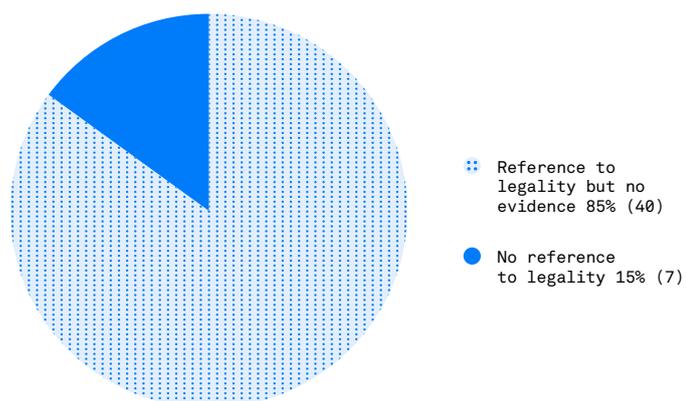
Not a single piece of verifiable evidence of legality was provided

◀ A hippo opens its mouth wide in Botswana.

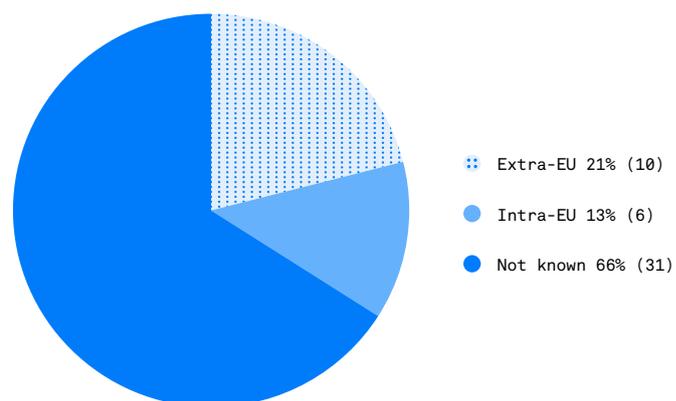
Product description categories

Category	Adverts	Specimens
Sculpture	16	21
Jewellery	9	12
Miniature painting	6	7
Other	5	6
Letter opener / Page turner	4	4
Netsuke	4	4
Tooth	1	4
Walking stick	1	1
Puzzle ball	1	1
Total	47	60

Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



Portugal

Background

In the late 14th century, the Portuguese started exploiting African ivory, shipping it back to Europe and trading some for Asian spices²⁷. Due to these long-standing colonial connections, Portugal was still a place where new and old ivory could be successfully smuggled in the early 2000s. In 2008, researchers Esmond and Chryssee Martin found that there were more ivory items in the capital city of Lisbon than in other much larger cities in southern Europe²⁸. IFAW's report Killing with Keystrokes 2.0²⁹ showed that, in 2011, Portugal was the country with the second highest number (189 ads on 13 websites) of potentially illegal ivory items offered for sale online among five European countries. According to a study¹⁴ published in 2018 in which radiocarbon testing was used to determine the age of ivory bought in Europe, 83% of the specimens purchased in Portugal were fake antiques being sold illegally.

Results

Of the 112 adverts recorded in Portugal, 12 offered a total of 17 raw ivory specimens (15 from elephants, 2 from whales), while the rest consisted of worked ivory and suspected worked ivory specimens. Almost three-quarters of the adverts (73.2%) openly claimed the item for sale was made from ivory, but only 17% of the adverts provided verifiable evidence of legality. Verifiable evidence was provided for 13.4% of worked ivory and suspected worked ivory specimens and 0% of raw ivory and suspected raw ivory specimens. When considering only elephant ivory, verifiable evidence was provided for 14.3% of the adverts, for 15% of the worked elephant ivory and suspected worked elephant ivory specimens, and for 0% of the raw ivory and suspected ivory specimens.

No of ads	112
Specimens for sale	166
No of online platforms	6
Ads offering extra-EU trade	20
Ads with a reference to legality	75
Ads without proof of legality	93
Ads with proof of legality	19
Most traded species ¹	Elephant (75)
Most traded form of ivory ¹	Worked ivory (149)
No of raw ivory ¹	17
No of species traded	3

17 raw ivory and suspected raw ivory specimens were recorded for sale in Portugal

17.9%

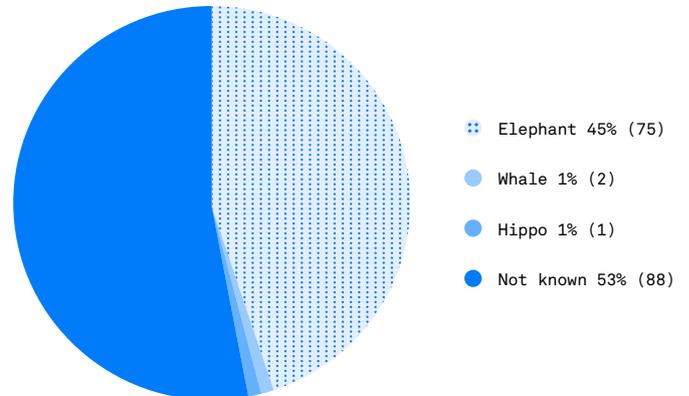
of the items were available for sale outside of the European Union.

17%

of the adverts provided verifiable evidence of legality.

► Ivory crushing in progress.

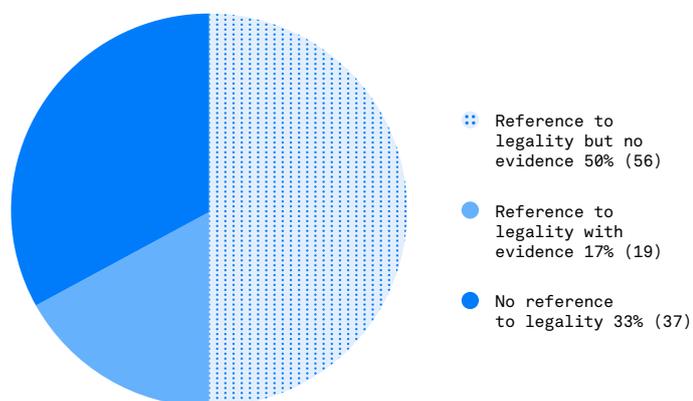
¹By number of specimens.



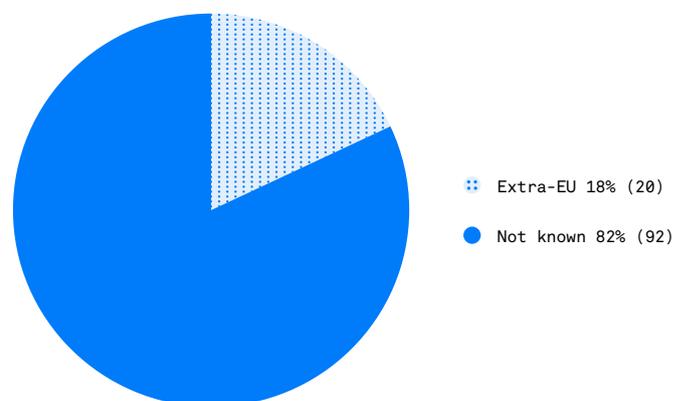
Product description categories

Category	Adverts	Specimens
Sculpture	60	93
Tooth / Tusk	14	19
Other	11	14
Miniature painting	9	16
Inlay	6	6
Jewellery	3	6
Fan	3	3
Puzzle ball	2	2
Letter opener / Page turner	2	2
Cutlery	1	3
Walking stick	1	2
Total	112	166

Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



Spain

Background

Ivory was traded in Spain as early as the third millennium B.C.; numerous ivory objects from both African and Asian elephants were found in archaeological sites³⁰. There is also evidence that elephant ivory imported from Africa was abundant in then-Islamic Iberia during the 10th century³¹. Due to its favourable location—particularly its geographical proximity to Africa and historical ties with Latin America—the country has long been an entry point to Europe and a transiting route between the Middle East and Asia for wildlife products, including ivory³². IFAW’s report Killing with Keystrokes 2.0²⁹ showed that, in 2011, Spain was the country with the third highest number (118 ads on four websites) of potentially illegal ivory items offered for sale online among five European countries. According to a study¹⁴ published in 2018 in which radiocarbon testing was used to determine the age of ivory bought in Europe, 100% of 18 specimens purchased in Spain were fake antiques being sold illegally.

Results

Of the 140 adverts recorded in Spain, two offered a total of three raw elephant ivory specimens, while the rest consisted of worked ivory and suspected worked ivory specimens. Three-quarters of the adverts (105) openly claimed the item for sale was made from ivory. While over half of the adverts (55.7%) referred to legality, only 2.9% of the adverts provided verifiable evidence of legality. Verifiable evidence was provided for 3.3% of worked ivory and suspected worked ivory specimens and 0% of raw ivory and suspected raw ivory specimens. When considering only elephant ivory, 4.2% of the adverts provided verifiable evidence: 4.8% for worked elephant ivory and suspected worked elephant ivory specimens and 0% for raw elephant ivory and suspected raw elephant ivory specimens. ivory and suspected ivory specimens.

No of ads	140
Specimens for sale	185
No of online platforms	11
Ads offering extra-EU trade	92
Ads with a reference to legality	78
Ads without proof of legality	136
Ads with proof of legality	4
Most traded species ¹	Elephant (128)
Most traded form of ivory ¹	Worked ivory (182)
No of raw ivory ¹	3
No of species traded	4

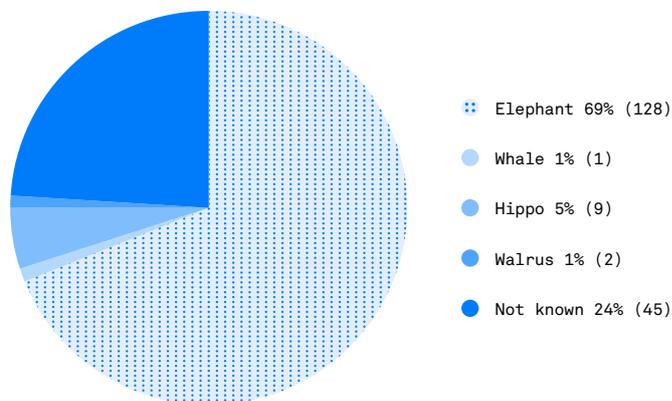
Ivory items from at least 4 species were recorded, including 9 specimens from hippopotamus

65.7%

of the items were available for sale outside of the European Union.

Only 2.9% of the adverts provided verifiable evidence of legality

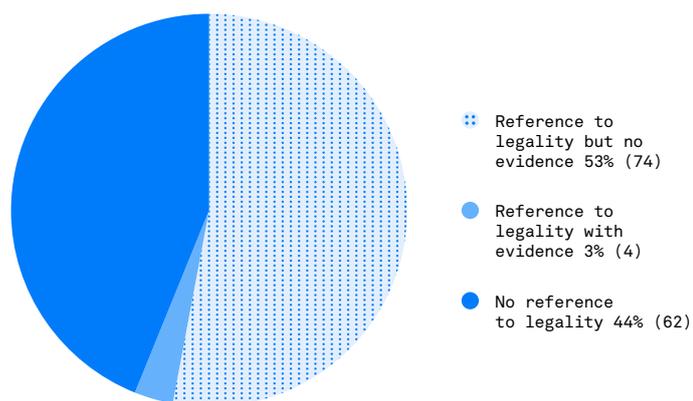
¹By number of specimens.



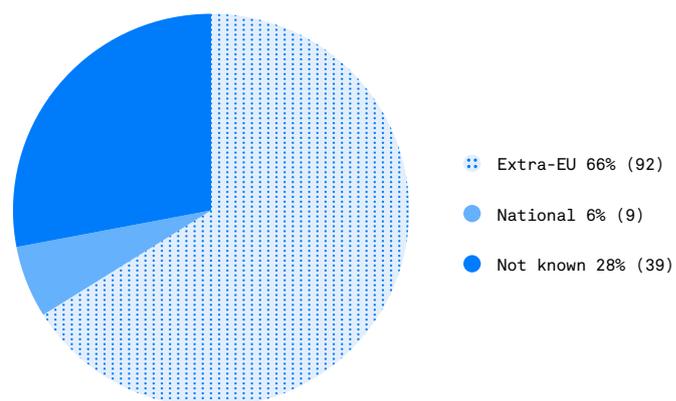
Product description categories

Category	Adverts	Specimens
Netsuke	13	18
Jewellery	15	15
Sculpture	63	81
Miniature painting	21	21
Fan	1	1
Letter opener / Page turner	3	3
Tooth	3	4
Walking stick	2	2
Other	19	40
Total	140	185

Reference to legality and presentation of evidence share of total by adverts



Offered shipping region



◀ Male narwhal swimming along the surface with its tusk out near Canada.

The UK situation

In June 2022, IFAW welcomed the UK Government announcement making it illegal to trade elephant ivory items in the UK, except for very limited exemptions. Those breaking the law face prosecution and a fine of up to £250,000 (almost €300,000) or up to five years of imprisonment. IFAW commissioned the same independent researcher MK Wildlife Consultancy in 2021 and 2023 to assess the effectiveness of the Ivory Act³³. MK Wildlife Consultancy analysed the quantity of ivory being sold in the UK on

online platforms and social media before and after the Act came into effect. Findings across the studies showed that the UK Ivory Act had 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. In 2023, in 10 days, 211 adverts offering 264 ivory specimens across seven online marketplaces were recorded. Though the data recorded during the UK and EU studies are not directly

comparable due to differences in the number of countries and platforms/adverts investigated, the results from the UK clearly suggest that the Ivory Act had a positive impact, while in the EU, the many exceptions in the new rules and the absence of a clear and legally binding ban create loopholes. Trade continues, and enforcement is complicated by the possibility of claiming proof of legality.

Conclusions

Research results show that significant amounts of ivory continue to be traded online in the EU. In only 23 days, 1,330 ivory and suspected ivory items were recorded for sale on 831 adverts across 49 online marketplaces and auction house websites. Most probably, even more ivory is offered online.

- ▶ Adverts for elephant ivory and suspected elephant ivory far outnumbered (77%) all the adverts for ivory coming from other ivory-bearing species.
- ▶ Overall, 60% (501) of all adverts openly claimed the item for sale was made from ivory.
- ▶ While almost three-quarters of all adverts claimed some form of legality, only 9% provided verifiable evidence to support the claim.

- ▶ Verifiable evidence was provided for only 9.9% of worked ivory and suspected worked ivory specimens and 3.1% of raw ivory and suspected raw ivory specimens.
- ▶ No verifiable evidence of legality was provided for any of the 18 raw elephant ivory specimens found, which is highly suspicious considering that commercial imports, internal trade, and exports of raw elephant ivory from the EU are prohibited except for very strict exemptions requiring proof of legality for intra-EU trade.
- ▶ Although a large majority (73%) of the recorded sellers were located in the EU, 41% offered extra-EU trade, which is highly suspicious considering that commercial imports to and re-exports of ivory from the EU are not authorised, except for very narrow exemptions.

Together, these results highly suggest that a considerable part of the ivory recorded was illegally advertised for sale online. This highlights weaknesses in the new EU ivory trade rules and their implementation and monitoring. Coordinated efforts from all stakeholders are still required to ensure that the EU market is not contributing to elephant poaching and ivory trafficking.

▼ Ivory objects before destruction.



Photo: Elisabeth Perotin / © IFAW

Recommendations

Recommendations to the European Commission, European Parliament, and the EU Member States:

- ▶ Establish a dedicated monitoring framework/mechanism to assess the appropriate implementation of the revised EU guidance and legislation by the Member States and promptly address potential lack of enforcement and shortcomings. The framework should include solutions to measure the evolution of illegal trade (especially online ivory trafficking), to evaluate the effectiveness of the revised rules, and to address emerging trends in future policy decision-making.
- ▶ Transform all existing trade rules into legally binding legislation and close any remaining loopholes, e.g., require that ivory sellers display evidence of legality in their online adverts and detail the types of evidence required (i.e., a picture of the certificate of exemption or a registration number).
- ▶ Take a firmer stance on wildlife cybercrime. Specialised investigation units for competent authorities and a dedicated EU Code of Conducts or Guidance on wildlife cybercrime would help to make the detection of illegal wildlife trade and harmonised enforcement easier in all Member States.
- ▶ Urge Member States to establish and implement harmonised and reliable systems for the collection and destruction of ivory objects surrendered by the public so that these items are permanently removed from trade. A possible solution would be to replicate the model already in place and working in the Netherlands and Belgium, with some adjustments. The collection and destruction of the ivory should be fully managed by enforcement authorities.
- ▶ Continue to raise awareness among the general public about the ivory trade.
- ▶ Support training of relevant enforcement agencies and the whole judicial chain in identifying and prosecuting illegal ivory sales.

Recommendations to online marketplaces and antique auction house websites:

- ▶ Recognise wildlife cybercrime as a serious crime, and allocate more resources to tackle it.
- ▶ Consider a full ban on selling ivory items and look-a-like products to avoid abuse, as done by e-commerce platform Leboncoin³⁴. IFAW also recommends a ban on selling any product from protected species and any live animal online.
- ▶ Prioritise the monitoring of adverts using proactive tools to detect a greater range of search terms associated with ivory; promptly remove suspicious listings, especially those that do not contain any verifiable evidence of legality and develop mechanisms allowing users to flag illegal content, as requested by the most recent EU legislation on online trade (the EU Digital Services Act).
- ▶ Provide comprehensive messaging about conservation and the EU/national rules on ivory trade and display recurring warnings that inform users of the risks associated with purchasing illegal wildlife products. Websites should include warnings on adverts selling CITES-listed species that CITES permits are required if the seller includes international sales as an option or auction house websites that offer international shipping. Adverts claiming an item is elephant ivory should display a warning as a matter of course.
- ▶ 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, and WWF via the Coalition to End Wildlife Trafficking Online, www.endwildlifetraffickingonline.org/).

Recommendations to members of the public:

- ▶ Do not buy or sell ivory. Whether items are for sale in a physical shop or online, avoid purchasing wildlife products, especially those illegally traded.
- ▶ Do not like and share suspected illegal online 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.

◀ Crushing seized ivory in Nice, France.



Acknowledgements and end notes

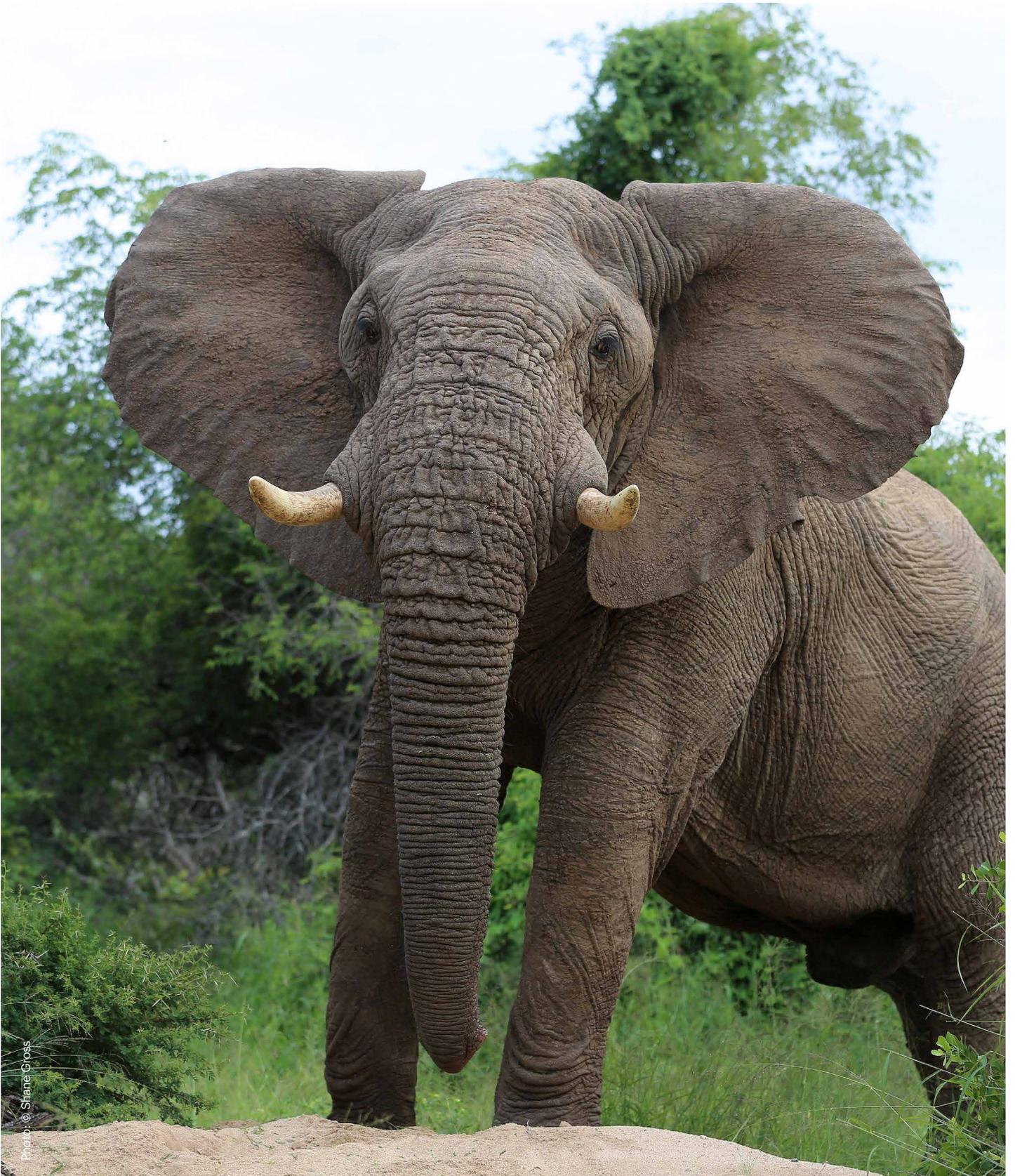


Photo: © Shane Gross

Acknowledgements

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▲ African elephant.

End notes

1. International Fund for Animal Welfare (IFAW). (2017). Ivory seizures in Europe (2006-2015). <https://www.ifaw.org/international/journal/new-report-reveals-scale-of-ivory-seizures-across-europe>
2. Average number obtained based on data compiled by TRAFFIC:
 - ▶ 2023, An Overview of seizures of CITES-listed Wildlife in the EU in 2021. <https://www.traffic.org/publications/reports/cites-listed-seizures-eu-2021>
 - ▶ (2022). An Overview of seizures of CITES-listed Wildlife in the EU in 2020. <https://www.traffic.org/publications/reports/an-overview-of-seizures-of-cites-listed-wildlife-in-the-eu-in-2020/>
 - ▶ (2021). An Overview of seizures of CITES-listed Wildlife in the EU in 2019. <https://www.traffic.org/publications/reports/an-overview-of-seizures-of-cites-listed-wildlife-in-the-eu-in-2019/>
 - ▶ (2020). An Overview of seizures of CITES-listed Wildlife in the EU in 2018. <https://www.traffic.org/publications/reports/an-overview-of-seizures-of-cites-listed-wildlife-in-the-european-union/>
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