

INTERNATIONAL SURVEY
BIDDING
FOR EXTINCTION

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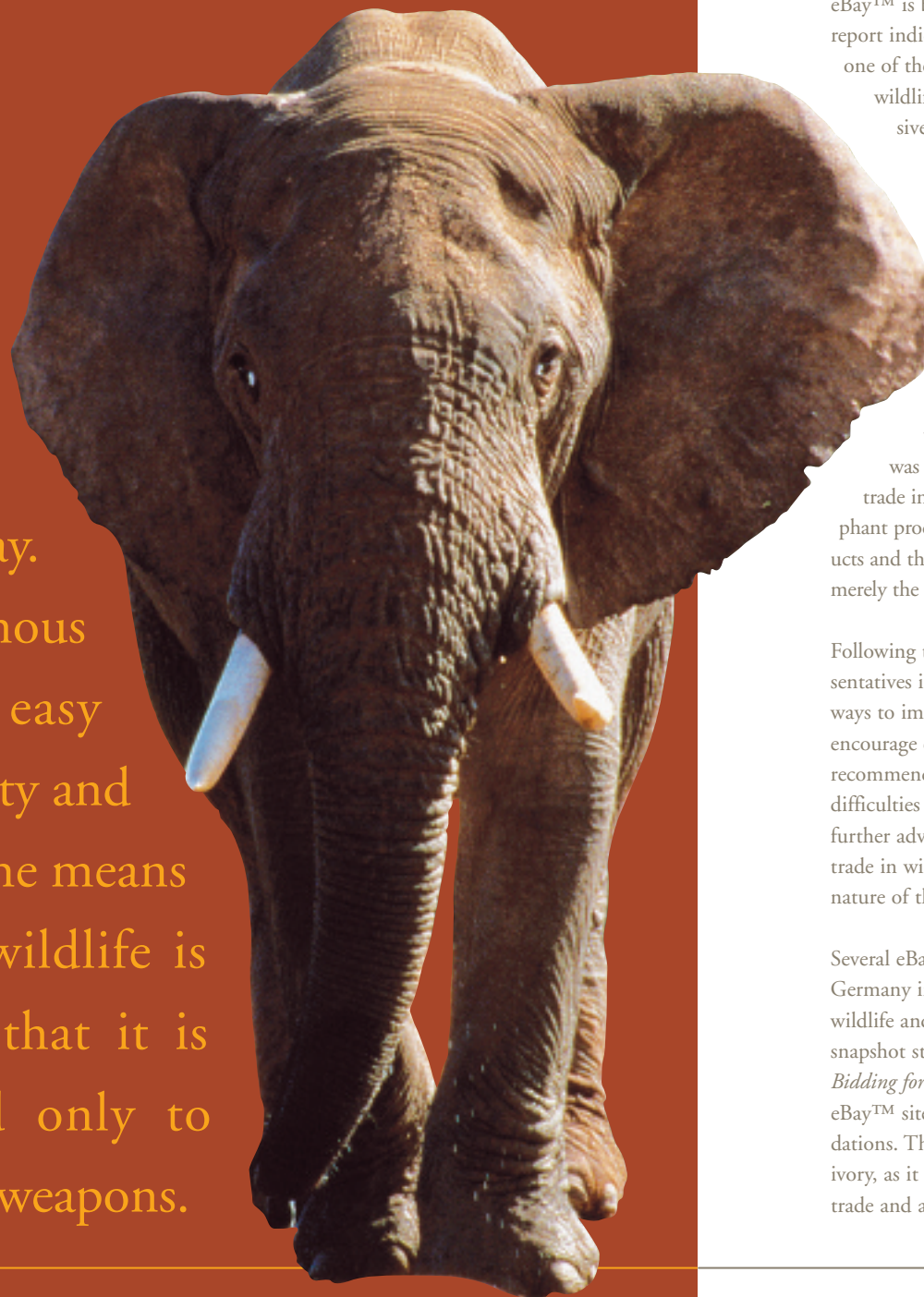


A snapshot survey of illegal trade in elephant ivory on eBay™ sites in:
Australia • Canada • China • France • Germany • Netherlands • UK • USA

Bidding

FOR EXTINCTION

The Internet has become the world's biggest marketplace, one that is open for business 24 hours a day, seven days a week, and which grows bigger by the day. It is as unregulated and anonymous as it is immense, providing easy opportunities for criminal activity and transactions. Increasingly it is the means by which the illicit trade in wildlife is conducted—a trade so great that it is now estimated to be second only to illegal trafficking in drugs and weapons.



The Internet's very anonymity makes it impossible to quantify exactly the scale of the illegal trade in protected and endangered species. However, a succession of in-depth investigative reports by organizations that include IFAW, the Humane Society of the United States and the Wildlife Conservation Society has uncovered worrying levels of wildlife trade via the Internet.


eBay™ is by far the Internet's single biggest shop window. And as this report indicates, national websites run by eBay™ are being used as one of the main channels through which illegal trade in wildlife and wildlife products is conducted over the Internet. A comprehensive and alarming failure by eBay™ to take adequate action is allowing users to buy and sell wildlife products made from some of the world's most endangered species.

Background to the Survey

The 2005 IFAW UK's report, *Caught in the Web: Wildlife Trade on the Internet*, revealed the disturbing findings of an intensive investigation into this online trade. IFAW was astonished to find more than 9,000 wild animals and animal products for sale in just one week.¹ This figure was all the more alarming since the survey was conducted solely on English language sites and restricted to trade in just five categories of endangered species: live primates, elephant products, turtle and tortoiseshell products, other reptile products and those from wild cats. Clearly, the investigation uncovered merely the tip of an enormous iceberg.

Following that report IFAW met with national eBay™ website representatives in Europe, North America, Asia and the Pacific to discuss ways to improve awareness of the problem of wildlife trade and to encourage eBay™ to crack down on illegal trading. It was IFAW's recommendation that eBay™ prohibit all wildlife trade because of the difficulties in distinguishing between illegal and legal products. IFAW further advised eBay™ to increase public awareness of the legalities of trade in wildlife, to carry out monitoring to assess the scale and nature of the trade and develop enforcement techniques.

Several eBay™ websites have welcomed IFAW's involvement: eBay™ Germany in particular has toughened its stance on the listing of wildlife and wildlife products on its site. However, this follow-up snapshot study of ivory trade on eBay™ sites in eight countries², *Bidding for Extinction*, indicates that most of the other national eBay™ sites seem to have paid only lip service to IFAW's recommendations. The focus of this investigation has been put on elephant ivory, as it is one of the most crucial examples of detrimental wildlife trade and an indicator of the wider situation.

Pieces of ivory are removed from a container. The ivory was confiscated in Singapore and returned to Kenya. 



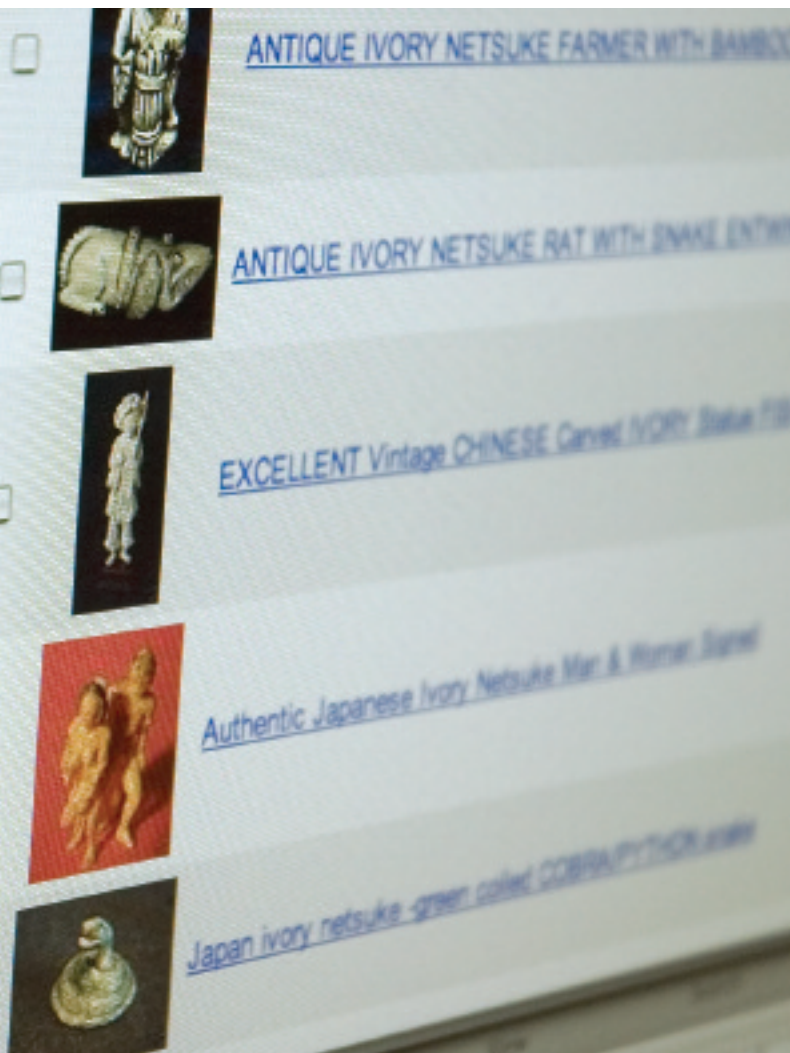
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The results of this new study reveal an alarming level of trade, specifically in ivory items, on these eBay™ national websites. Of those items we investigated, more than 90 percent breached the stated ivory listing policies of the respective eBay™ websites.

About eBay™

eBay™ is an Internet phenomenon. Founded in 1995, this California-based business and its 33 national subsidiaries provide a global online marketplace where “practically anyone can trade practically anything”³, primarily on an auction basis.

On any one day millions of items are on offer on eBay™ sites around the globe, from antiques, toys, books and computers to sports items, electronic goods and cars. eBay™ crosses national boundaries and cultures and has grown huge on its success:



- 1** It has more than 180 million registered users worldwide
- 2** There are approximately 78 million eBay™ listings internationally at any one time, traded in more than 50,000 categories
- 3** More than \$1,500 worth of goods are bought and sold via eBay™ every single second
- 4** Its net revenues totaled US\$4.552 billion in 2005

Reporting of suspect items on eBay

All of eBay™’s national sites have listing policies regarding items that are unacceptable for sale. There is also a general eBay™ Authenticity Disclaimer that is clearly applicable to the listing of ivory items, stating: “Sellers may not disclaim knowledge of, or responsibility for, the authenticity or legality of the items offered in their listings. Sellers should take steps to ensure that their items are authentic before listing them on eBay™. If a seller cannot verify the authenticity of an item, the seller is not permitted to list it.”

The various eBay™ sites also have systems enabling suspect items to be reported. This reporting mechanism varies from country to country. On some eBay™ websites reporting is done by finding the policy section concerning prohibited items, clicking on an email symbol and entering the item number. On other sites, links for the reporting of items appear next to item descriptions.

The action that eBay™ advises it will take in response to these reports also varies from country to country, as do policies on the listings for sale of wildlife products, including elephant ivory.

Wildlife Trade Law

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is a legally binding framework that regulates trade in listed species between countries. Today, CITES gives varying degrees of protection to more than 33,000 species of animals and plants.

Animals and plants listed under CITES Appendix I are threatened with extinction and excluded from any international commercial trade except in very special circumstances. Among the species listed are: most elephants, great apes, lemurs, the giant panda, cheetah, leopards, tigers, rhinoceros, parrots and all sea turtles. Appendix I contains fewer than 600 animal species and a little more than 300 plant species.

CITES Appendix II contains species that, although not threatened with extinction now, might become so unless trade in them is strictly controlled and monitored. This Appendix includes all those elephants, primates, wild cats, cetaceans, parrots and crocodiles not listed in Appendix I. Appendix II covers over 4,100 animal species and 28,000 plant species.

Appendix III includes species that are protected within the borders of a member country. An Appendix III listing allows a country to call on others to help it regulate trade in the listed species. This Appendix lists over 290 species.

At present 171 countries are parties to the Convention and are obliged to comply with its provisions.

The impact of the ivory trade: elephant endangerment

Elephants in Africa and Asia are endangered, victims of rampant poaching for the ivory trade. During the 1980s African elephant numbers plummeted from an estimated 1.3 million to 450,000 because of widespread ivory poaching.⁴ Poaching for ivory has also affected Asian elephants, which are estimated to number just 35,000 to 45,000 in the wild. Forest elephants in Central and West Africa are also vulnerable because of poaching for ivory and for bush meat, combined with habitat loss.

During the 1980s African elephant numbers plummeted from an estimated 1.3 million to 450,000 because of widespread ivory poaching.

In 1989 CITES introduced a global trade ban to halt the wholesale slaughter of elephants for their ivory. 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 this, the world’s largest land mammal.

While international wildlife protection law is complex, in general it is illegal to sell carved or uncarved ivory unless it is antique (defined inconsistently) and accompanied by documentary proof of age. Antique ivory or ivory of an unknown age also requires documentation to prove its legality. The import and export of other elephant products, such as items made from elephant skin, are also strictly regulated.

Often wildlife protection law lags behind the actual need for conservation, as is the case in many countries which still allow some legal ivory trade. Such small legal trade often becomes a cover for huge amounts of illegal ivory, which are laundered into the legal market. Based on seizures of large-scale shipments of ivory IFAW estimates conservatively that in recent years more than 20,000 elephants have been poached annually in Africa to supply the illegal markets in ivory around the world. Powerful companies like eBay™ have a special responsibility to oppose such ruthless and illegal slaughter and to ensure that illegal wildlife products are eliminated effectively from their sites.



Raw ivory made into jewelry is sold on eBay™.

The IFAW 2007 eBay™ Survey

This snapshot survey was carried out as a follow-up to the 2005 *Caught in the Web* study, to test the effectiveness of eBay's™ rules and monitoring systems by identifying the scale of trade in elephant ivory on its national sites.⁵

Our researchers investigated eBay™ websites in Australia, Canada, France, Germany, the Netherlands, the UK and the USA for seven consecutive days in a randomly chosen week in February 2007.⁶ Additionally, researchers monitored eBay™ China over four days.⁷ Since this was a snapshot survey, in most cases researchers did not contact sellers or attempt to verify the authenticity of the ivory listings. Researchers also included listings from international sellers.⁸

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Information on elephant ivory items listed for sale was collected and tabulated using three main categories:

- **Item listing appeared fully compliant with that country's eBay™ policy, which IFAW considered would reflect the requirements of international and national legislation**
- **Listing Violation 1:** item claimed as antique but no reference made to supporting documentation
- **Listing Violation 2:** no reference either to age of item or to eBay™ policy

At the end of the first day of monitoring some of our investigators reported a selection of items that they considered to be illegal to eBay™ safety centers in their respective countries.⁹ They then tracked the items to note whether they were removed from the site.



Wildlife souvenirs like these make their way from regions of South Africa, to all over the world, via the world wide web.

Results of the Snap-shot Survey

The Results

AUSTRALIA



Australia's eBay™ website gives an appraisal of the trade in wildlife and animal parts, contact details for several wildlife-related sites and has a substantial guide to which wildlife-related items can be bought and sold on eBay™.

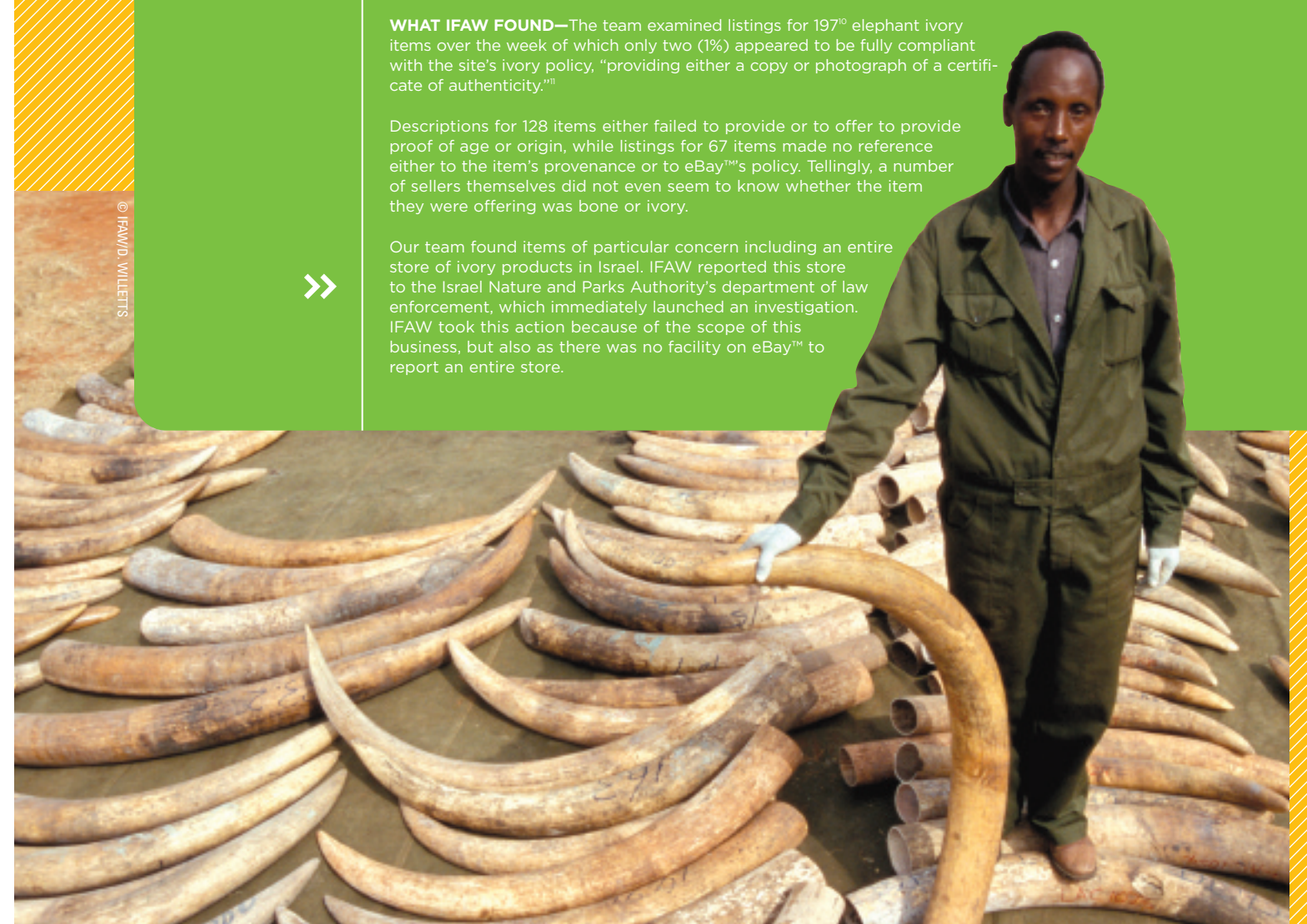
But Australia eBay™'s own information on elephant ivory is confusing. Sellers are advised that 'endangered or protected species, or any part of any endangered or protected species may not be listed on eBay™'. Sellers are also informed that both species of elephant, the African and the Asian, are considered by CITES to be threatened by trade and that accordingly, 'the import and export of elephant products, such as carved ivory figurines, carved and uncarved tusks, wallets, bags, furniture or other items made from elephant ivory are strictly regulated and are not allowed on eBay™'. However, the policy then goes on to contradict itself by stating that trade in ivory is allowed if 'the seller has documentary proof that the item predates 1st June 1974, the proof is included in the listing and the item is in a significantly worked form.' Sellers are also advised to consult with their state's regulatory authority and customs to ensure specific ivory items may be lawfully sold.

WHAT IFAW FOUND—The team examined listings for 197⁹ elephant ivory items over the week of which only two (1%) appeared to be fully compliant with the site's ivory policy, 'providing either a copy or photograph of a certificate of authenticity.'¹¹

Descriptions for 128 items either failed to provide or to offer to provide proof of age or origin, while listings for 67 items made no reference either to the item's provenance or to eBay™'s policy. Tellingly, a number of sellers themselves did not even seem to know whether the item they were offering was bone or ivory.

Our team found items of particular concern including an entire store of ivory products in Israel. IFAW reported this store to the Israel Nature and Parks Authority's department of law enforcement, which immediately launched an investigation. IFAW took this action because of the scope of this business, but also as there was no facility on eBay™ to report an entire store.

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The Results

CANADA



Canada eBay™ policy states: “eBay™ urges sellers and buyers to comply with all applicable laws and regulations. Since the sale of live animals and wildlife products is in some cases prohibited, highly regulated or may cause harm to eBay™ or its members, sellers are restricted in their listing of them on eBay™. This policy helps protect buyers from purchasing illegal merchandise and helps create a safer market place.”

The sites specific policy on ivory is vague, saying: “This area is complex, and sellers should consult with Environment Canada¹² to ensure that the particular item involved may lawfully be sold. Generally, ivory from African elephants may be sold within Canada as long as it was lawfully imported into Canada prior to July 3 1975.”



WHAT IFAW FOUND—Our Canada team examined listings for 717 items resulting from a search for ‘ivory’ and found that 627 were elephant ivory.¹³ Descriptions for 72 (10%) of these items apparently met eBay™ policies in Canada by clearly identifying the piece’s age, claiming it was exempt by virtue of age and/or referring to a CITES certificate. Ads for 496 of the items claimed the item as antique, yet provided no evidence, while ads for 67 more referred neither to age nor eBay™ policy. Violations were difficult to determine because of the vagueness of Canada eBay™’s ivory policy. While we believe that 563 items would warrant investigation, our team reported 70 to eBay™. Only three of these appeared to be removed from sale as a result. Furthermore, some sellers did not know whether what they were selling was bone or ivory or even its species of origin.



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Our team found 76 elephant ivory items listed on eBay™ China and 33 for products made from other endangered wild animals.

The Results

CHINA



Following an IFAW investigation in 2005 the Chinese CITES authorities issued a notice banning all elephant ivory sales through the internet at IFAW’s request. eBay™ China acknowledges this ban, which also prohibits the sale of animals and parts of animals that are either endangered or protected under national law or CITES, including tiger, rhinoceros and turtle products.

These findings are a matter of great concern and clearly illustrate that there is not enough attention given to the problem of illegal trade in cyberspace by the Chinese authorities or eBay™ China. However, the trade prohibition has vastly decreased the scale of the trade in wildlife via the Internet in general - a lesson for other countries to follow.¹⁴

WHAT IFAW FOUND—Despite this prohibition our team found 76 elephant ivory items listed on eBay™ China and 33 for products made from other endangered wild animals. Alarming, these comprised three products made from tiger tooth or claw, 13 from rhino horn and 17 from turtle shells. These species are all protected by a CITES Appendix I listing and as Class 1 National Protected Wild Animals in China. These items were being sold in the Chinese language from China.





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The Results

GERMANY



Until May 2006 hundreds of ivory items were offered for sale each week on eBay™ Germany (weekly one-day snapshots had shown up to 400 items per day). Following negotiations with IFAW, eBay™ Germany introduced strict controls. While IFAW requested that it ban ivory altogether, eBay™ Germany adopted a less rigorous, though well-policed policy: it now permits the listing of ivory items if they are antiques produced from pre-1947 carved ivory but only with an official certification of age posted in the listing. No raw or marginally worked ivory is allowed. For any other ivory item legality must be proven by a photograph of the official sales permission issued by a relevant wildlife trade enforcement authority.¹⁶

This new policy has since reduced the number of ivory items on the website by 98 percent as tracked by IFAW Germany, with only between one and ten items now being offered during a typical week.

WHAT IFAW FOUND—Despite the progress made by eBay™ in Germany our researcher logged 66 ivory items during the survey week, a result skewed by the fact that 44 of these were from a collection of antique African ivory statues being offered by a single seller. A certificate was shown in this listing, which was confirmed as genuine by the federal authority at IFAW's request. While this resolved this particular issue IFAW is concerned that enforcement authorities are incapable of ensuring that such permits are not used to launder illegal ivory.

All the remaining 22 ivory items contravened eBay™ Germany's explicit policy. Eighteen were claimed as antique but no documentation was offered; four (small brooches and necklaces) had neither certificates nor statements of age.

All the suspected illegal items were removed by eBay™ Germany by the time the research week ended. IFAW has found that eBay™ Germany responds promptly and efficiently to reports of suspect ivory. On one occasion following our snapshot survey, eight out of ten listings on the site were reported; all were removed the same day.



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The Results

FRANCE



eBay™ France draws users' attention to CITES and to national French legislation and advises that the sale of ivory, fur and animal skins is banned on its site.¹⁵

WHAT IFAW FOUND—Our team recorded no less than 703 ivory products on eBay™ France - all of them for sale openly in defiance of both the national and international ivory ban.

The stated policy of eBay™ France is to remove prohibited items from sale within 24 to 36 hours of being alerted to their presence. Our team reported 200 of the 703 ivory items and checked them 24 to 48 hours later: not one had been removed.

The only conclusion to be drawn is that either eBay™ France is failing to adequately monitor what it offers for sale or is simply turning a blind eye to it.



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The Results

NETHERLANDS



eBay™ Netherlands' policy on the sale of elephant ivory specifies that it can be traded providing it was legally imported. No information, however, is given about the requirements for the legal importation of ivory, which makes it one of the weakest of all national eBay™ policies.

WHAT IFAW FOUND—Our team found 92 listings for elephant ivory on eBay™ in the Netherlands, all of which were considered to be in contravention of the global ban on ivory trading. Of these, 56 listings claimed that the item was antique, however no reference was made to any supporting evidence for the claim in the listings, other than statements along the lines of "I inherited it from my grandmother" or "my parents brought it back from the Congo in 1930."

An IFAW investigator contacted the sellers of 40 of these items and asked for documentation to illustrate that the items were antique: none of the sellers could offer any proof. Four items were reported as contravening eBay™ policy and one listing was subsequently removed.



Our team found 92 listings for elephant ivory on eBay™ in the Netherlands, all of which were considered to be in contravention of the global ban on ivory trading.

The Results

UNITED KINGDOM



eBay™ UK warns users that the sale of animals and their parts is subject to a range of UK and Irish legislation aimed at helping to conserve endangered species. It also warns that ivory items may only be listed subject to two conditions.

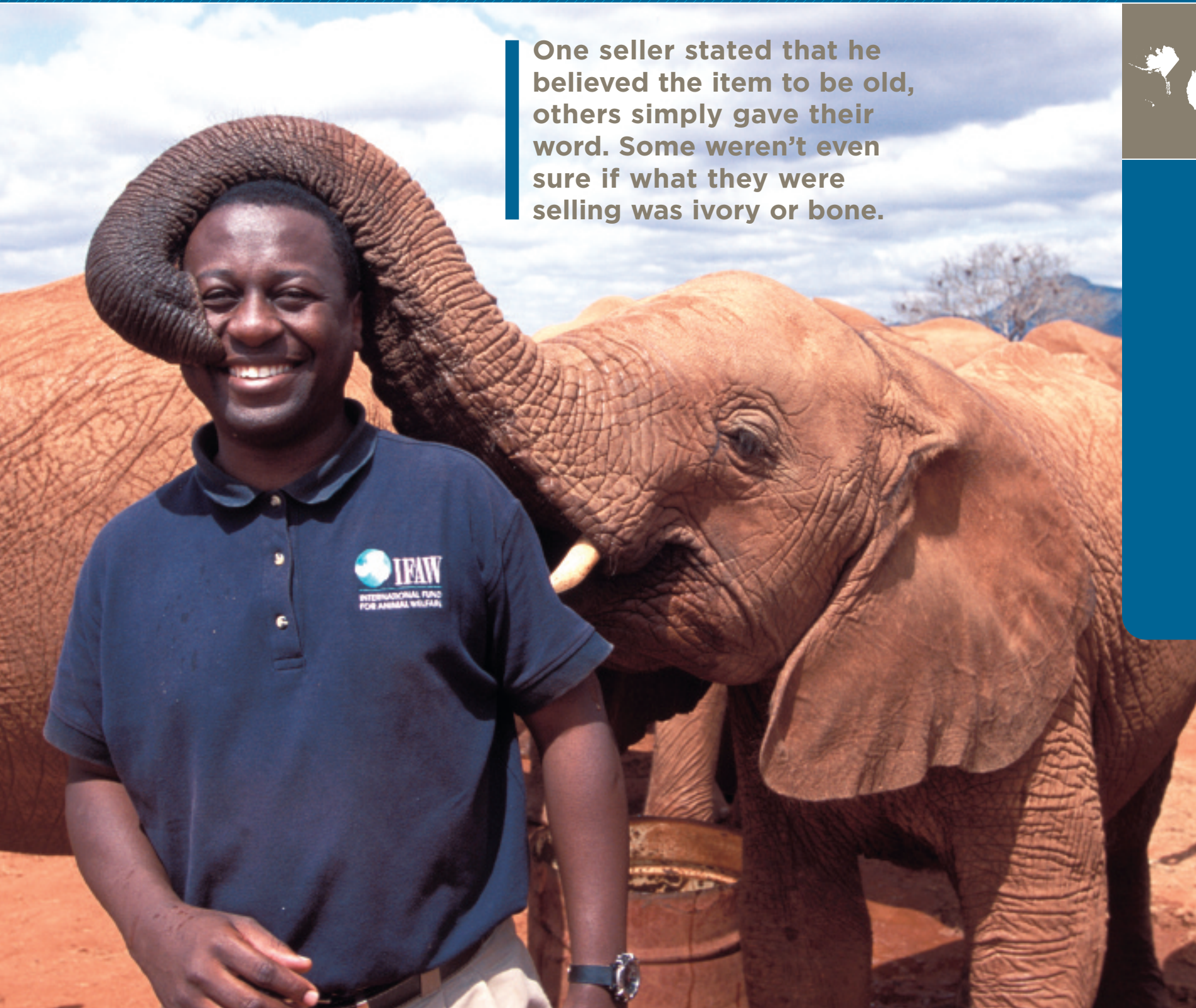
First, the seller must have "documentary proof that the item is older than 1st June 1947, that proof be included in the listing, and the item be in a significantly worked form." Secondly, that "the item is accompanied by an Article 10 Certificate as issued by the Department for Environment, Food and Rural Affairs (Defra), or the Irish Department of the Environment, Heritage and Local Government, and such certificate is included in the listing." The first condition is open to wide interpretation, since there is no stipulated level of "proof."

WHAT IFAW FOUND—Our team found 424 elephant ivory items listed over the survey week, most originating in the UK but some from other countries including Thailand and China. Only two items (0.5%) offered Defra certification, 347 were Violation 1 Listings (unsupported claims of antiquity) and 67 were Violation 2 Listings (neither age of item nor eBay™ policy mentioned).

eBay™ UK claims to act within 24-36 hours to remove prohibited items reported to it. Of the 105 items that were reported to eBay, we found that 75 were still listed 48 hours later.

Our team also logged three hippo ivory objects, one made of tortoiseshell and another of ivory and tortoiseshell: this last item was removed following our report to eBay™, but was then re-listed as "faux." This raises the issue of suspicious items reported to eBay™ being simply re-listed later under different descriptions.

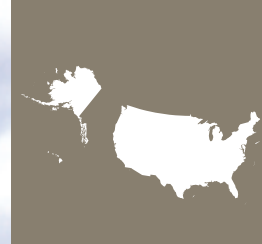




One seller stated that he believed the item to be old, others simply gave their word. Some weren't even sure if what they were selling was ivory or bone.

The Results

USA



eBay™ USA's policy prohibits the listing of items made from a wide range of wild species. It states: "Animal parts, including pelts and skins from endangered species or protected species, or any part of any endangered or protected species may not be listed." That would seem to outlaw ivory, which is "part of" a "protected species."

Yet, confusingly, eBay™ USA then goes on to say of ivory specifically: "This area is complex, and sellers should consult with the US Fish and Wildlife Service and their state wildlife regulatory agency to ensure that the particular item involved may lawfully be sold. Generally, ivory from African elephants may be sold within the United States as long as it was lawfully imported into the United States."

This second, contradictory, statement suggests, without saying explicitly, that there is an allowable exception on sales of elephant ivory providing it has been lawfully imported. This lack of clarity is compounded by the site's failure to explain what constitutes the legal importation of ivory into the US. And eBay™'s reference to lawfully imported ivory from African elephants being permissible for sale in the USA leaves a question mark over the legality of the sale of ivory from Asian elephants.

In fact, according to the US Fish & Wildlife Service, elephant ivory may not be imported providing it is over 100 years old ("antique") and a pre-CITES Convention certificate is obtained "from the Management Authority for the country where the piece containing ivory is located. The permit must clearly state that the ivory is more than 100 years of age."



WHAT IFAW FOUND—Ninety ivory items were found to be listed during the survey week of which only four appeared to be fully compliant.¹⁸ There were 73 Violation 1 incidences (claims of antiquity but no reference made as to proof) and 13 Violation 2 incidences (no reference either to age or to eBay™ policy. Only one seller had a photo of a CITES permit, but this proved to be for alligator and crocodile products he had and not for the ivory item he was selling. One seller listed 28 ivory items, claiming that they had been "imported under CITES in the 1980s."¹⁹

Many sellers were violating the eBay™ general policy stipulating that sellers are not permitted to list items if they cannot verify their authenticity or legality. One seller stated that he believed the item to be old, others simply gave their word. Some weren't even sure if what they were selling was ivory or bone.

Interestingly, our team also noted that some items were listed twice and at different starting prices. One was a 100 pound teak elephant, listed with a starting price of \$595 and again with a price of \$895. Its tusks were either bone or ivory; the seller didn't know which. Another apparent double-listing was for a tusk, starting at \$695 and also at \$675.

eBay™ USA's policies covering the sale of ivory are not only confusing and ill-defined they are hopelessly weak. At present the policy requires no proof that ivory is legal, simply the seller's word.



Monitoring of trade in ivory on eBay™

While the action that eBay™ advises it will take in response to reports of complaints may vary from country to country, there is one common thread: its privacy policy. Where our investigators noted that items reported were subsequently removed, it was difficult to know if eBay™ had intervened and an item had been removed as a result of the complaint, or removed for other reasons (such as a sale), as eBay™ provides no feedback to reportees.

The effectiveness of the monitoring mechanism also differed hugely between sites. Some countries appeared to have removed some items and others appeared to have taken little or no action.

eBay™ Country Website	Number of elephant ivory listings investigated	Number of potentially fully compliant listings
AUSTRALIA	197	2
CANADA	627	72
CHINA	77	0
FRANCE	703	0
GERMANY	66	44
NETHERLANDS	92	0
UK	424	10
USA	90	4
Total number investigated	2275	134 Total number considered compliant (less than six percent)

Conclusion

There is no single, well-defined, consistent global eBay™ policy on the listing of elephant ivory or wildlife products. The many national eBay™ websites have their own rules, which tend to be vague and in some cases both confused and confusing. This leaves the rules open to interpretation by the majority of well-meaning sellers and to abuse by those determined to profit from the illegal sale of items made from species at risk. It also raises the possibility that sellers whose items might be banned under one eBay™ site's rules are instead listing them on other national sites whose rules are less strict or even more vague. eBay™ must accept responsibility for the impact that trade in wild animal products on its market sites may have on the world's wildlife. It must also start showing coherent responsibility not only for items listed on marketplaces under its own brand but also those sites that it owns but that operate under different names.²⁰ As the largest and most recognizable online auction site the onus is on eBay™ to start setting an international example of best practice.

At present, sellers need merely claim that their ivory or wildlife items can be sold legally, primarily by reason of antiquity to avoid eBay™ intervention. Many sellers, however, are being allowed simply to list items with no provenance of legality whatsoever, in blatant contravention of the rules on most eBay™ websites.

This is because, in general, the eBay™ sites' enforcement of their largely vague and variable listing rules appears to be haphazard and hopelessly inadequate. The hard fact is that on most of the websites surveyed, fewer than six percent of the ivory items listed complied with those sites' own rules. Worse, very few of the suspect items we reported were removed from sale as a result within the promised time – and eBay™'s privacy policy ensured that where some items were de-listed, we were never able to discover why. This could mean that at least some of the illegal items were sold despite the reported violations.

In at least one case it seems that an item that was de-listed following a complaint by IFAW was simply re-listed under a new description, raising the specter of another possible loophole in eBay™'s monitoring system that may be available for exploitation.

With the notable exception of eBay™ Germany, overall the eBay™ system for controlling the sale of ivory items is enabling people, either knowingly or out of ignorance, to bid literally for the extinction of endangered animals.



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Recommendations

The trade in ivory is cruel and unsustainable. eBay™ must take global co-coordinated action to ensure that its various national websites play no part in this trade. IFAW would like to see eBay™:

Ban the trade in all endangered species²¹ and their products (e.g. CITES App. I) from all its sites, – this is by far the simplest and indeed the most cost-effective solution to the problem and would include a ban on all trade in elephant ivory and elephant products

Stop the illegal trade in all protected wildlife products on all its international and subsidiary sites by tightening its policies in relation to relevant legislation protecting these species and by ensuring these policies are properly enforced

Devote sufficient resources to ensure regular and detailed monitoring of site content for illegal wildlife products and to enable rapid and appropriate action to be taken in relation to any suspicious items

Establish an effective reporting mechanism to allow users to report any suspicious items easily and receive prompt feedback on action taken as a result

Establish close cooperation with appropriate enforcement agencies in order to facilitate the reporting of suspect items for investigation

Ban all trade in wildlife products from all its sites²², if the above can not be implemented effectively and efficiently²³

IFAW would like to see governments pay proper attention to the issue of illegal trade in wildlife on the Internet on a national and international scale by:

- 1** **Introducing a code of practice** for all sales of wildlife²⁴ and live animals on the Internet
- 2** **Adopting adequate legislation** to enable enforcement authorities to ensure compliance with international and national wildlife trade legislation and to ensure strong penalties as a deterrent for illegal traders
- 3** **Implementing strategic monitoring** to assess the scale and nature of this trade and for the development of tactical adequate enforcement techniques
- 4** **Increasing public awareness** of the legalities of the trade in wildlife (for example, by developing user-friendly web pages, setting up hotlines) and to decrease demand for illegal products.

IFAW believes that the scale of the Internet trade in endangered and threatened species poses such a threat that the CITES²⁵ signatory nations should establish urgently an international Enforcement Task Force to address the issue effectively. IFAW is currently lobbying for Parties to CITES to take the interim step of convening a Workshop on Internet Wildlife Trade.



NOTES

1. IFAW, July 2005, see: www.caughtintheweb.co.uk

2. The eight countries were selected because they were large consumer countries that have problematic levels of illegal wildlife trade and significant online markets. IFAW has offices and expertise in each of these countries.

3. eBay™ mission statement

4. 'The Ivory Trade and the Future of the African Elephant: Summary to the interim report of the Ivory Trade Review Group' in *Pachyderm* no. 12, 1989. <http://www.iucn.org/themes/ssc/sgs/AfESG/pachy/pdfs/pachy12.pdf>

5. It is important to note that while this snapshot was designed to be consistent across all countries, it involved investigators looking at different eBay™ policies in a number of countries. Therefore the methods used may have varied slightly.

6. 19 – 25 February 2007

7. Two days in January and two days in February 2007.

8. Because a seller may list an item on multiple eBay™ sites, the item may have been counted multiple times in our snapshot survey.

9. This does not equal legal investigations as IFAW does not have enforcement authority to request legal documentation. The judgment was based on the evidence that was presented on the site.

10. IFAW Australia found approximately 800 items listed under the category 'Antique Ivory' and around 250 under the category 'Ivory Elephant'. Under 'Tusk Carving' on average 20 items were typically listed, with about 200 under the 'Ivory Carving' heading. A number of these items would have been repeat listings. Of the 197 elephant ivory items investigated 100 items did not specifically state that they were elephant ivory or otherwise. However, based upon list price and/or images provided by the seller they cannot be discounted as not being elephant ivory.

11. eBay™ policy states that the documentary proof should be "listed with the item." If that is interpreted as meaning that a copy or photograph should appear with the listing then only two items complied with the policy. If the policy means that documentation has to be mentioned in the listing then more items would have been fully compliant.

12. Environment Authority in Canada

13. IFAW Canada found listings for more than 5,200 ivory items under various categories including 'ivory tusk', 'ivory in Asian antiques' and 'ivory in jewellery and watches' but in some of these categories 'ivory' could have been a reference to ivory like material or a colour description. Many listings also mentioned mammoth, whale, walrus or hippo ivory for which Canada eBay™ has no policy.

14. The absolute number of 77 ivory items found in this China snapshot is significantly lower than the 511 items found in a ten day survey done in 2005, a reduction of about 85%.

15. See: <http://pages.ebay.fr/help/policies/wildlife.html>

16. eBay™ Germany also has strict rules over the listing of items made from parts of endangered or threatened wild animals, citing the need for sellers to have valid official certificates that permit them to sell the items.

17. The Dutch team also investigated ivory listings on Marktplaats, one of eBay's subsidiary sites in the Netherlands. Marktplaats advises users of its site that endangered species may not be traded but it has no specific guidelines on ivory at all. The team found 104 listings for elephant ivory of which 34 contained claims of being antique with the remainder featuring no reference either to age or the site's policy. None of the items were considered to have met the requirements of the site that there should be no trade in endangered species.

18. Even these four items are subject to suspicion as the permit numbers provided were not supported by a photograph of the permit in the listings – all offered by the same seller. Visual proof of an official certificate provided in the listing should be a minimal requirement.

19. This is one of the problems unless ivory trade is prohibited generally. Enforcement authorities cannot ensure that the item in trade is the item mentioned on an old CITES certificate, which leaves a loophole open for abuse. But even these items may come from poached elephants as laws are too often inadequate. It is well known that more than 90% of the ivory, which entered the 'legal markets' in the 1980s came from poached elephants.

20. For example, Marktplaats in the Netherlands

21. "Including all their populations and sub-species"

22. Those sites operated under the "eBay™" brand as well as those owned by eBay™ in full or large

23. If for example eBay™ chooses not to establish the necessary internal enforcement capacity to control and enforce these rules

24. Including protected species listed by CITES or recognized by national legislation

25. CITES Conference of the Parties meet approximately once every 2.5 years. The 14th meeting takes place from June 3-15 2007, during which Parties will be debating the need for governments to address the growing problem of illegal trade on the Internet. Germany, on behalf of the EU, has tabled a document calling for the immediate formation of a workshop to deal with this issue.