

AN INVESTIGATION OF HAWAII'S
ONLINE IVORY TRADE



IFAW
International Fund
for Animal Welfare



WCS



HUMANE SOCIETY
INTERNATIONAL



TABLE OF CONTENTS

Executive Summary	03
The Global Elephant Poaching Crisis	04
The U.S. Ivory Market	05
Online Ivory Sales In The U.S.	06
Hawai'i's Ivory Market	07
Investigative Procedure	08
Summary Of Findings	10
Documentation And Legality Claims	14
Conclusion	15
Sources	16
Acknowledgements	18

EXECUTIVE SUMMARY

Over the last decade, surging consumer demand for ivory has triggered a nearly unprecedented poaching wave, one that threatens to drive African elephants toward extinction unless the killing—and demand for tusks and carvings—is halted soon. Many countries including the United States have moved this issue to the top of their conservation policy agendas, most importantly by restricting their domestic ivory markets. The U.S. federal government is expected to finalize a strong ivory trade ban soon that will address imports, exports, and interstate trade, and several states have passed laws to complement the federal rule by restricting intrastate ivory commerce. Hawai'i, which has perhaps the country's biggest remaining market for ivory products, is poised to follow suit.

These local efforts are crucial to stopping sales of illegally-imported items—Law

enforcement officials estimate that some 90% of smuggled shipments leak past border inspections and find their way into the marketplace,¹ where they are largely indistinguishable from older, legal ivory.²

For this report, investigators compiled advertising and sales data from 47 Hawai'i-based retailers and individual sellers engaged in the online trade of elephant ivory and related wildlife products, including walrus tusks, whale teeth and bone, mammoth ivory, and hippopotamus teeth. They found a total of 4,661 products in stock or for sale, with an overall value of more than \$1.22 million, over a six-day period. The vast majority of this inventory (85.5%) was elephant ivory.

Few of these retailers provided any evidence that their wares had been legally imported into the state.

Some 28% of the sellers (14 of 47) referred to their advertised items as being “pre-ban,” “antique,” or “vintage,” but only one of the 47 provided supplemental documentation of legal import.

Taken together, this large overall inventory and scant proof of legality are cause for concern. Add to this the fact that Hawai'i is a known destination for illegal ivory shipments, and the case grows for strong restrictions on intrastate ivory sales.





THE GLOBAL ELEPHANT POACHING CRISIS

African elephants are facing an unprecedented crisis. Populations are plummeting all across the continent due to astounding levels of poaching: Out of a total of perhaps half a million individual animals, scientists estimate that more than 100,000 elephants were killed by poachers between 2010 and 2012 alone—an average of one elephant every 15 minutes, or 96 every day.³ Populations of one subspecies, the African forest elephant, have declined by 65% since 2002, meaning it could be extinct in the wild in a decade if the trend continues.⁴ Sadly, despite growing international attention, the massacre shows few signs of stopping. Wildlife trafficking has plagued the African continent in decades past, but the current generation of poachers is increasingly organized and well-armed; many are backed by international criminal syndicates and some are even linked to brutal terrorist groups.⁵

The recent uptick in elephant poaching is driven by extraordinary consumer demand for their tusks, which are carved into a variety of objects including jewelry and decorative statues. The past ten years has seen soaring market prices for ivory products, largely due to a growing middle class in China and other Asian

countries where ivory products are considered by some to have significant cultural value.⁶ But the United States is also a significant ivory market that contributes to the global demand for ivory products; ivory from recently poached elephants is regularly smuggled into the United States and sold both in storefronts and online, often disguised as antique, legal ivory.⁷

In response to the resurgent crisis, the federal government and some U.S. states are working to close the loopholes that have allowed the illegal ivory trade to flourish in the United States. On the heels of a 2013 Executive Order on combating wildlife trafficking, issued by President Barack Obama, the U.S. Fish & Wildlife Service (USFWS) crushed six tons of confiscated ivory in November 2013 and nearly one ton in June 2015 to publicize the issue, and has encouraged other countries to follow suit.⁸ The USFWS is also in the process of revising its policies and regulations governing the import, export, and interstate sale of African elephant products and has worked with other federal agencies and their counterparts overseas to initiate a “whole-of-government” solution to the problem through a National Strategy on Combating Wildlife Trafficking.⁹

The federal rule is limited to import, export, and interstate commerce and does not apply to sales occurring wholly within a state. Interpol, the global police organization, estimates that only 10% of illegal goods are seized during border inspections. State bans will add a critical layer of protection by preventing much of the remaining 90% from infiltrating our domestic markets—particularly in poorly-regulated venues such as e-commerce platforms, antique shops, flea markets, and auction houses. To that end, over the last two years, New York, New Jersey, California, and Washington (the latter via a ballot initiative) have enacted laws to close their intrastate ivory markets, with several other states currently pursuing ballot initiatives and legislation.¹⁰



SINCE 2002, AFRICAN FOREST ELEPHANT POPULATIONS HAVE DECLINED 65%

THE U.S. IVORY MARKET

Under current federal law, it is illegal to engage in interstate commerce in Asian elephant ivory, unless such ivory is an antique over 100 years old. However, interstate commerce in *African* elephant ivory is generally allowed, unless the ivory was imported illegally (e.g., after the Convention on International Trade in Endangered Species (CITES), the international governing body for wildlife trade, banned international sales of African elephant products in 1989).^a Even now, thousands of ivory items are brought across our borders each year: data compiled from the USFWS Law Enforcement Management Information System (LEMIS) shows that between 2009 and 2012, the United States allowed the legal import of 13,221 ivory objects and 430 kilograms of additional tusks and ivory pieces, as well as the legal export of 6,753 ivory objects.¹¹ These continued imports, along with a large existing national inventory, present huge hurdles for law enforcement. It is challenging to visually determine the age or origin of this material and, with virtually no documentation requirements for ivory sales, the legal market for ivory in the United States facilitates a parallel illegal market. Further, totally unregulated “look-alikes” such as mammoth and mastodon ivory help to obscure illegal sales.

Although it is difficult to gauge the exact level of trade in the United States, recent studies paint an alarming picture: A 2008 survey found 24,004 ivory items for sale in 657 outlets in 16 towns and cities across the United States.¹² Based on visual inspection and interviews with subjects, experienced researchers estimated that nearly one-third of the ivory items they observed for sale could have been illegal under federal law.¹³ Similarly, a 2002 study conducted by

The Humane Society of the United States (HSUS) found that the United States has a large market for both worked ivory, supplied, at least in part, by illegal imports of ivory objects carved in China, and raw ivory tusks (some of which come from sport-hunted trophies) that can be carved into items such as model ships and gun or knife handles.¹⁴

According to these investigations, New York, California, and Hawai'i were the U.S. states with the largest ivory markets, with New York City, San Francisco, Los Angeles, and O'ahu serving as the top four locales.¹⁵ In the aforementioned 2008 report, investigators discovered 124 outlets selling at least 11,376 ivory items in New York City, 54% of which were from Japan and 40% of which were from China.¹⁶ While some of the ivory was legal at the time, about 10% of the items were recently made, according to investigators.¹⁷ A 2015 study of California's ivory market commissioned by the Natural Resources Defense Council (NRDC) found over 1,250 ivory items offered for sale by 107 vendors in Los Angeles and San Francisco.¹⁸ This report determined that in Los Angeles, up to 90% of the ivory seen was likely illegal, and in San Francisco, up to 80% of the ivory seen was likely illegal.¹⁹ The study also found a much higher incidence of what appeared to be ivory of recent manufacture in California, roughly doubling from approximately 25% in 2006 to about 50% in 2014.²⁰ The study concluded that most of the ivory products surveyed appear to have originated in East Asia.²¹

The official response to this mounting emergency has been proportionate and encouraging: As noted above, New York (in 2014) and California (in 2015) have



enacted laws to ban the vast majority of their states' ivory trade.²² As this survey will make clear, Hawai'i remains a major center of trade and must follow suit in enacting a prohibition on ivory sales.

^a ASIAN ELEPHANTS ARE LISTED AS “ENDANGERED” UNDER THE U.S. ENDANGERED SPECIES ACT; AFRICAN ELEPHANTS ARE LISTED ONLY AS “THREATENED,” A CATEGORIZATION THAT PROVIDES FEWER LEGAL PROTECTIONS.



ONLINE IVORY SALES IN THE U.S.

While some of the wildlife trade in the United States takes place in bricks-and-mortar stores, a growing portion occurs on the internet, particularly when it comes to ivory.

Indeed, a 2008 study by the International Fund for Animal Welfare (IFAW) found that the United States was responsible for more than two-thirds (or 5,026) of the 7,122 online auctions, advertisements, and communiqués openly offering trade in legally-protected wildlife it uncovered in 11 countries over six weeks.²³ This was nearly ten times more than the two countries with the next highest volumes: the United Kingdom and China.²⁴ Elephant products—predominantly ivory—were the most commonly available items in six of the eight countries profiled, with the United States responsible for ten times more ivory listings than the next closest country (the U.K.).²⁵

Similarly, in its 2014 study of both storefront and online ivory auctions in the United States, IFAW found 4,186 ivory and suspected ivory items offered for sale from 340 online auctions during a nine-week investigation.²⁶ This is an average of 465 lots for sale per week (or an estimated 24,186 ivory lots for sale per year).²⁷

In 2015, IFAW and the Wildlife Conservation Society (WCS) released a study specifically on the trade of illegal wildlife products, including ivory, on the online classified advertising platform Craigslist.org.²⁸ Craigslist has long banned wildlife product sales (and, in response to the investigation, added “Ivory; endangered, imperiled and/or protected species and any parts thereof” to its index of banned items in 2015), but the study unveiled a large volume of these items available for sale on the website.²⁹ During the five-day investigation, which examined Craigslist sub-sites for 28 U.S. locales, investigators counted 522 postings offering more than 615 ivory, suspected ivory, and related wildlife products.³⁰ The combined list price for these items was at least \$1,429,151.³¹ If extrapolated to a full year, this would be more than 6,600 items with a list price exceeding \$15.3 million.³²

The United States’ growing online marketplace for wildlife products coincides with worldwide trends. Indeed, in 2014, IFAW reported a total of 33,006 endangered wildlife and wildlife parts and products from species listed on CITES Appendix I and II available for sale in 9,482 advertisements on 280 online marketplaces in 16 countries during a

six-week period.³³ Ivory was one of the most widely traded items, featured in almost one-third of all advertisements.³⁴

As a result of growing awareness of the online marketplace’s role in the ivory trade, along with public pressure, numerous businesses have taken steps to minimize their impact on elephants and other imperiled species. For example, Craigslist explicitly banned ivory advertisements in 2015 (as mentioned above);³⁵ eBay.com banned the sale of ivory in 2009;³⁶ Etsy.com—a popular platform for art and handcrafted items—instituted a ban on endangered species products in 2013;³⁷ and LiveAuctioneers.com, one of the subjects of IFAW’s 2014 survey, has implemented a significant program for retailer outreach and review that aims to minimize the use of its platform as an ivory sales hub. However, as demonstrated by the Craigslist.org study, even websites that institute restrictions on the sale of wildlife products often have difficulty controlling the trade on their forums.

HAWAII'S IVORY MARKET

Hawaii is the third largest retailer of ivory in the United States, behind only New York and California which, as mentioned above, have recently enacted laws prohibiting most ivory sales.³⁸ This is likely due, at least in part, to Hawaii's position as a major Asia-Pacific center of commerce and tourism, with dozens of flights and ships entering its ports and airports daily from across Asia and the Pacific.

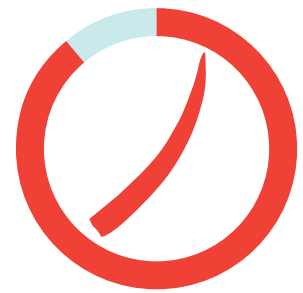
A 2008 investigation of Hawaii's ivory market found that 89% of ivory items found for sale in Hawaii were of unknown or likely illegal origin. Of the 1,659 items found for sale on the island of O'ahu, only 191 (11%) were determined to be legal.³⁹ The survey also found that Hawaii had the largest proportion of ivory items that were "recently made" for sale in the nation, further suggesting that the items were illegally imported or carved after the federal restrictions were already in place.⁴⁰

In July 2013, the HSUS and Humane Society International (HSI) conducted preliminary research to examine Hawaii's online ivory marketplace. Seven prominent online ivory websites were identified that, combined, offered more than 1,000 ivory objects for sale. Items advertised for sale ranged in price from \$45 to \$35,000. Only one of these websites offered any documentation

regarding the date and origin of its items, and even this documentation failed to correspond to any individual item. Jewelry and small statues were the most common types of ivory found for sale; in particular, there were many Ming's ivory jewelry pieces from the eponymous international retailer, established in 1940, which had a location in Honolulu. Ming's Honolulu offered hand-carved ivory items depicting Hawaiian and Asian motifs and flowers. All of the Ming's stores were shuttered by 1999, and Ming's jewelry is now highly coveted by collectors and jewelry connoisseurs. The study also found that many stores that had once had store-front locations had transferred their business online.⁴¹

Federal and state officials have expressed major concerns about the legality of the ivory trade in Hawaii. In June 2015, agents from the Hawaii & Pacific Islands Office of USFWS and the National Oceanic and Atmospheric Administration (NOAA) seized more than 430 bone, coral, and ivory carvings suspected to have been smuggled from the Philippines—including 90 elephant ivory carvings—from a retail merchant with four stores across Waikiki, Honolulu, called Hawaiian Accessories, Inc.⁴² Officials filed a 21-count indictment against the business and five individuals involved in the smuggling ring.⁴³

**ACCORDING TO
A 2008 STUDY,
89% OF IVORY
ITEMS FOR SALE IN
HAWAII WERE OF
UNKNOWN OR LIKELY
ILLEGAL ORIGIN.**



In response to the growing elephant poaching crisis and aforementioned studies identifying Hawaii as a top ivory market, in May 2013 the Hawaii State Legislature unanimously passed Senate Concurrent Resolution 149 urging Hawaii residents and businesses to comply with CITES regulations and not to buy or sell ivory of unknown origin that may have been illegally smuggled into the state.⁴⁴



INVESTIGATIVE PROCEDURE

This report is the product of a “snap shot” investigation carried out by experienced online investigators from the International Fund for Animal Welfare (IFAW), the Humane Society International (HSI), the Wildlife Conservation Society (WCS), and the Natural Resources Defense Council (NRDC).

Investigators took an intelligence-led approach, using a standardized methodology developed by wildlife trade and law enforcement experts for open source websites, to target current online sales of priority species that were likely to be included in upcoming Hawai'i state legislation. In addition to elephants, data were captured for products from hippopotamus, mammoth, whales (including narwhal), and walrus. A detailed description of the methodology, as well as records of all items logged, is on file with IFAW.

This investigation used a retailer-focused approach to provide in-depth documentation of products currently being advertised and sold by a range of Hawai'i-based online sellers including stores, galleries, artist associations, estate liquidators, auction sites, and individuals. Based on an initial three-day scoping search, investigators identified retailers that were based in Hawai'i and appeared to advertise potential ivory items or wildlife products from our target species.

Over the course of six days (December 9-14, 2015), investigators collected data on 47 retailers/individual sellers and their advertised products. Since some retailers did not always provide a sales price for advertised products, the market values contained in this report are likely underestimated. Few of these traders claimed to have supporting documentation; permits or other proof of provenance are required in some

instances to ensure the legality of ivory trade, however documents can be forged and therefore are not a guarantee that trade is legitimate.

Investigators classified an item as 'Likely Ivory' (for those products where the preponderance of evidence pointed toward the product being ivory), 'Suspect Ivory' (when items appeared to be ivory but were mislabeled or possibly disguised as another product), or 'Other Wildlife Product' (items that were not ivory or suspected ivory but were from the animals that fell within the scope of the investigation).



IMAGE: JULIE LARSEN MAHER © WCS



SUMMARY OF FINDINGS

Beyond the 2008 and 2013 surveys detailed above, relatively little statistical information exists to illustrate the scale of the ivory trade in Hawai'i. (Within the scope of this report, "ivory" refers to a product made from a tooth or tusk of an elephant, mammoth, walrus, whale, or hippopotamus.) The purpose of this project was to help fill that gap by measuring Hawai'i's online retail market in ivory and associated wildlife products, focused in particular on several species likely to be included in upcoming state legislation. Our investigation was guided by several main questions:

- What is the scale of online trade in ivory and other, related wildlife products from our target species in Hawai'i?
- What type of products predominate Hawai'i's online ivory market?
- What is the estimated value of online ivory sales?
- In which retail venues are the majority of these sales occurring?
- What claims do retailers make about the legality of their wildlife wares?

To this end, between December 9-14, 2015, investigators compiled advertising and sales data from 47 Hawai'i-based retailers and individual sellers engaged in the online trade of elephant ivory and related wildlife products, including walrus tusks, whale teeth and bone, mammoth ivory, and hippopotamus teeth. Subjects were selected for monitoring based upon a preliminary scoping exercise that found evidence of current or recent sales of these products.

Ivory retailers were dispersed throughout the Hawaiian Islands. The majority of subjects (22) were based on O'ahu, with others on Maui (13), Hawai'i Island (4), Kaua'i (3), Lāna'i (1), and four in unspecified locations. Twenty-six were businesses including stores, galleries, artist associations, estate liquidators, and antique and auction websites, while twenty-one were individuals operating on the peer-to-peer site Craigslist.org. Though many of the businesses also have physical storefronts on the islands, this investigation focused on online commerce exclusively and did not compile data on retailers' offline sales activity.

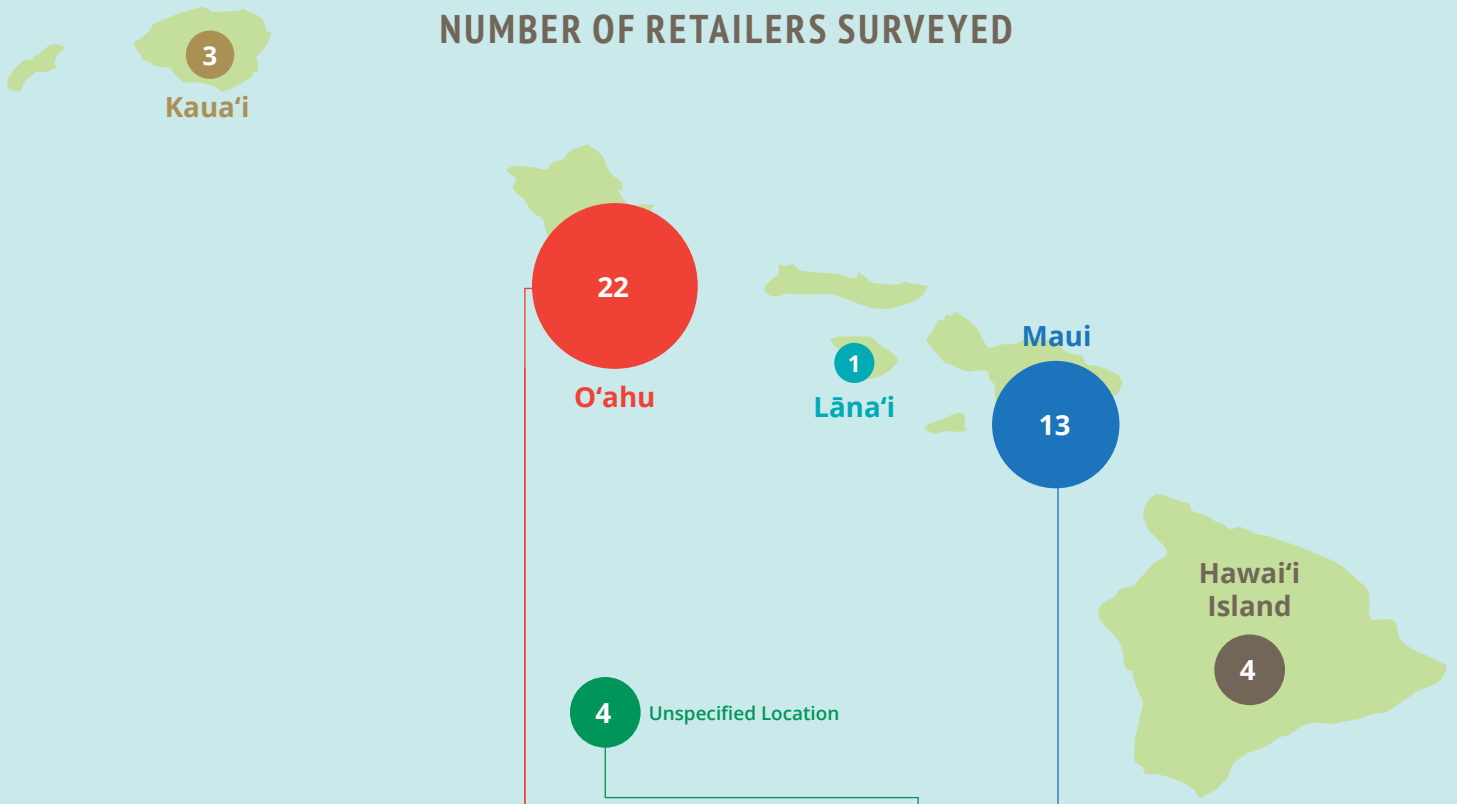
Our results reinforce the position that Hawai'i remains a major state market for ivory. **In just six days, investigators found 1,862 unique advertisements for the targeted wildlife products, many of which offered more than a single item. There was a total of 4,661 products in stock or for sale, with an overall value of more than \$1.22 million** (it should be noted that not all listings contained price information, so this is a conservative tally). An additional 490 products were advertised but were specified as currently out of stock or not for sale; these sellers frequently asked prospective buyers to contact them directly for additional information on such items or other custom pieces.^c Items ranged from small carvings to intricate pieces worth many thousands of dollars. Ten of the 47 retailers had inventories of these products valued at more than \$10,000, with four surpassing \$100,000 in current inventory. The largest online retailer boasted over \$574,000 in ivory products for sale.



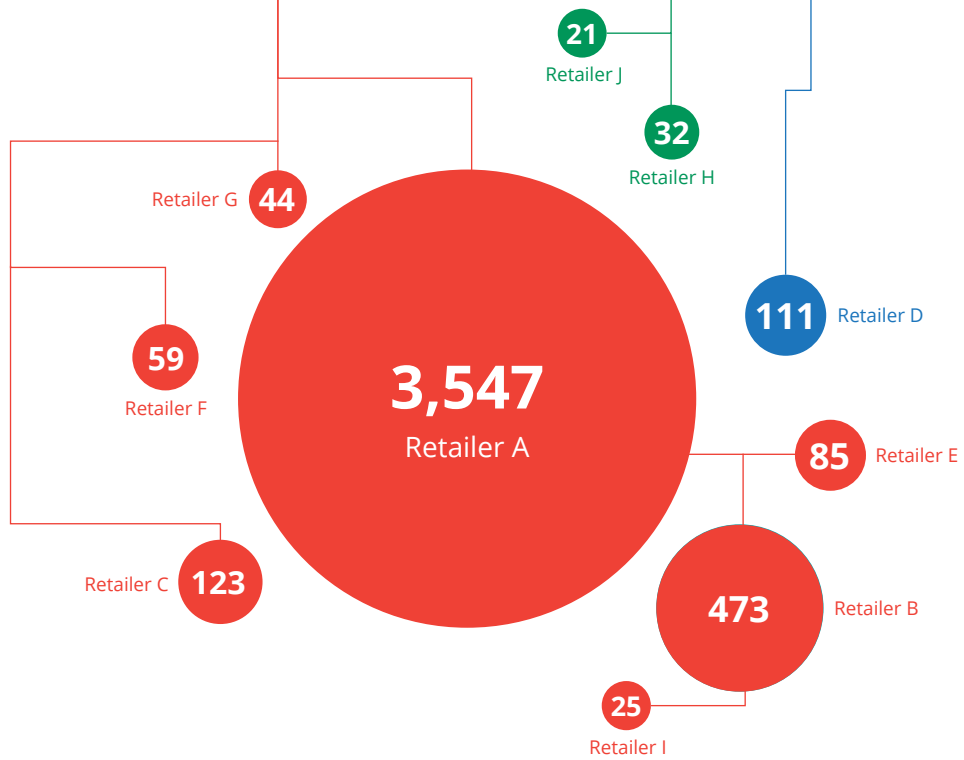
IMAGE: JULIE LARSEN MAHER © WCS

^c FOR THE ITEMS IN THIS SUBCATEGORY THAT DID HAVE A LISTED PRICE, THE TOTAL VALUE AMOUNTED TO \$133,039. USING THE AVERAGE PRODUCT PRICE PER RETAILER, THE TOTAL MARKET VALUE FOR PRODUCTS CURRENTLY FOR SALE IS ESTIMATED AT OVER \$1.27 MILLION.

NUMBER OF RETAILERS SURVEYED



TOP TEN RETAILERS by Number of Items



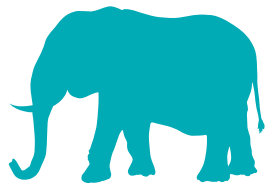
SUMMARY OF FINDINGS (CONT.)

Given inherent difficulties in assessing materials based solely on photographs and/or text descriptions, investigators classified products into three categories.^d The vast

majority of all items in stock or for sale were categorized as “Likely Ivory” (95%) or “Suspected Ivory” (4%), and accounted for almost all of the value of the inventories (\$1.21 million), while 1% of the items were “Related wildlife products”—non-ivory items such as scrimshawed elephant toenails, totaling \$19,550 in value. Elephant ivory (whether “Likely” or “Suspected”) was predominantly featured, comprising 85.5% of all items in stock or

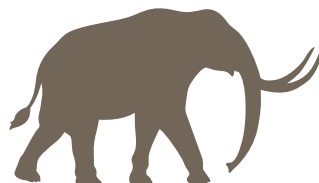
for sale, and elephant products (whether ivory or other parts) dominated the market: **Of the 4,661 products in stock or for sale, 3,986 (91%) were created from elephant parts, primarily ivory tusks;** of the remainder, 210 were whale, 96 were mammoth, 82 were walrus, 3 were hippopotamus, and 108 were listed as cow or ox bone but were suspected to be ivory based on the description, photographs, and price points.

TOP SPECIES PRODUCTS On Hawai'i's Online Market



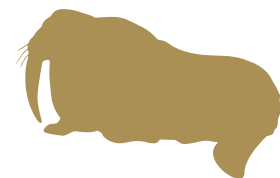
ELEPHANT

Number of Advertisements: **1,469**
Number of Products: **3,986**
Price (in stock or for sale): **\$935,837**



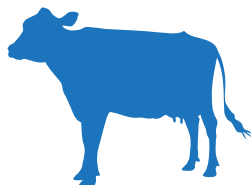
MAMMOTH

Number of Advertisements: **125**
Number of Products: **96**
Price (in stock or for sale): **\$82,103**



WALRUS

Number of Advertisements: **127**
Number of Products: **82**
Price (in stock or for sale): **\$49,522**



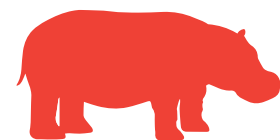
“COW/OX” (suspected to be ivory)

Number of Advertisements: **5**
Number of Products: **108**
Price (in stock or for sale): **\$40,415**



WHALE

Number of Advertisements: **75**
Number of Products: **210**
Price (in stock or for sale): **\$63,949**



HIPPO

Number of Advertisements: **6**
Number of Products: **3**
Price (in stock or for sale): **\$1,000**

^d THE ITEMS WE COUNTED IN THESE TOTAL NUMBERS WERE: “LIKELY IVORY” INCLUDED PRODUCTS DESCRIBED AS SUCH BY THE SELLER, AND WHERE THAT WAS CORROBORATED BY THE DESCRIPTION AND PHOTOS; “SUSPECTED IVORY” INCLUDED ITEMS THAT HAD A HIGH LIKELIHOOD OF INCLUDING IVORY, BASED ON ANALYSIS OF CODE WORDS, PRICE INDICATORS AND THE PHOTOGRAPHS PROVIDED; AND “RELATED WILDLIFE PRODUCTS” INCLUDED ITEMS THAT WERE NOT IVORY OR SUSPECTED IVORY BUT THAT WERE RETRIEVED BY OUR IVORY-RELATED SEARCH TERMS AND WHICH THE SELLER EXPLICITLY REFERRED TO AS ANIMAL BODY PARTS OR DERIVATIVES.

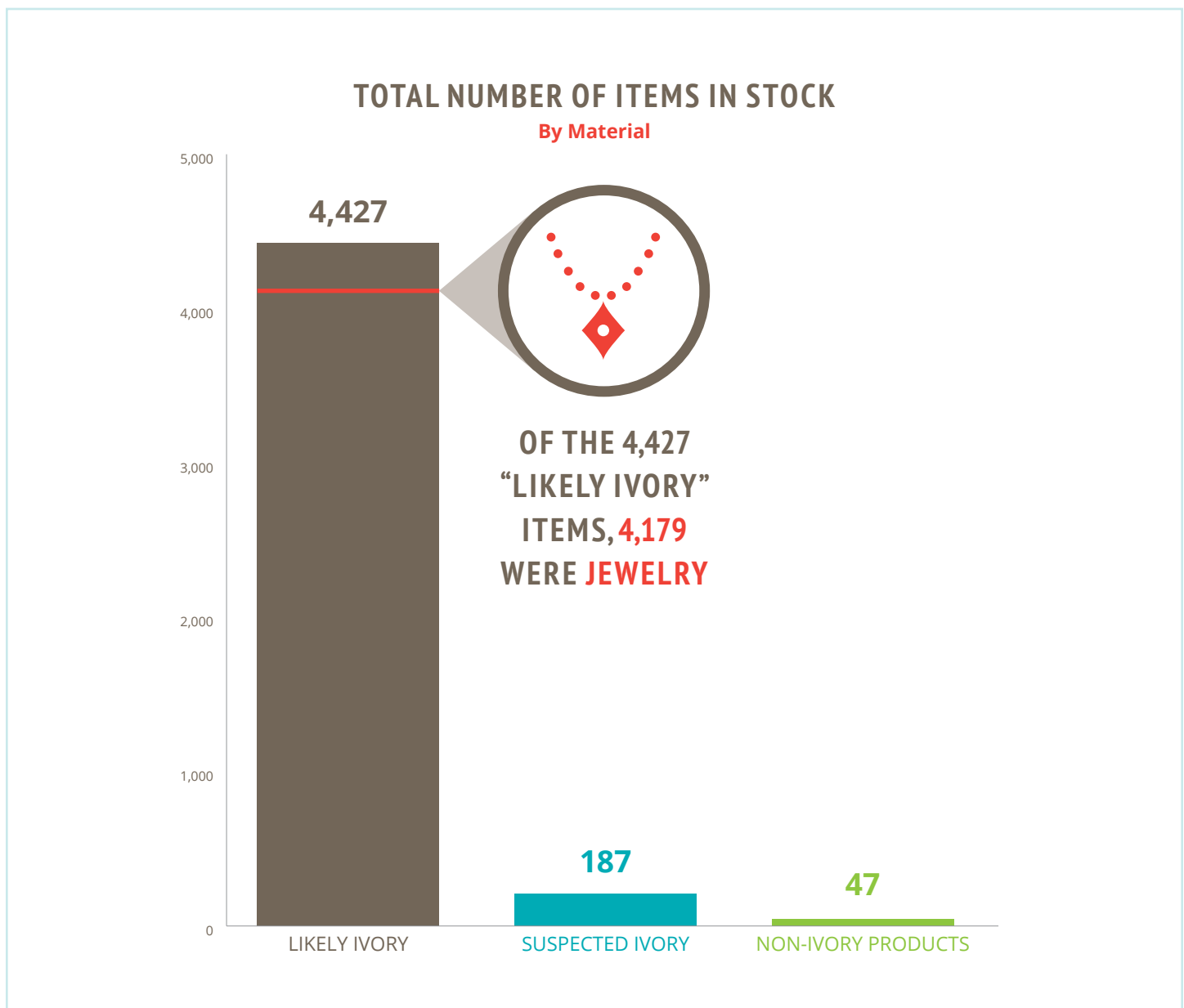
SUMMARY OF FINDINGS (CONT.)

An additional 176 products were from unspecified species (e.g., investigators were uncertain if they were derived from elephant, mammoth, whale, walrus, or hippopotamus) but

were suspected to match these criteria as well.

The advertised goods fell into five main categories: *Jewelry* comprised the highest percentage and value of items in stock or for sale (93.9%, \$912,940), followed by *Scrimshaw*^e (2.9%, \$74,034), *Statues, Carvings & Netsukes*^f (1.7%, \$157,362), *Other* (1%, \$52,668), and *Household Goods* (<1%, \$32,995). Hawai'i-centric

products were found with regularity, notably Ming's jewelry (see p. 7) and "fish hook" pendants. Again, it should be noted that this investigation excluded retailers who advertised fish hook pendants at low price points, which was an indicator that they were made of bone, rather than ivory. Other items included unique products such as talismans, snuff bottles, ornamental weapons, and hanko (seals).



^e SCRIMSHAW IS A CARVING OR ENGRAVING ON A WHALE TOOTH, IVORY TUSK, OR SIMILAR MATERIAL, USUALLY SHADED WITH INK.
^f A NETSUKE IS A MINIATURE IVORY SCULPTURE IN THE JAPANESE TRADITION.

DOCUMENTATION AND LEGALITY CLAIMS

At the time of this investigation, the state of Hawai'i did not prohibit intrastate sales of elephant ivory, though various federal laws (primarily the U.S. Endangered Species Act, the Lacey Act, and the Marine Mammal Protection Act) govern the interstate and international sale of elephant, walrus, hippo, and whale products. Moreover, until recently, the federal government allowed domestic commerce in ivory to proceed largely unmonitored, without enforcing requirements for documentation or proof of legality.⁴⁵ Officials with the U.S. Fish & Wildlife Service have only recently made clear that the burden is on ivory retailers to prove that the items they sell do not come from recently-killed elephants. But even as federal requirements tighten, documentation is frequently lacking and therefore it may be difficult to assess the legality of a specific ivory item.

While 30% of retailers (14 of 47) referenced at least some of their advertised items as being “pre-ban,” “antique,” or “vintage” in their product descriptions, only one of the 47 provided

supplemental legal documentation for importation of ivory items advertised on its website. However, it is unclear how this retailer tracks advertised items to correspond to the numerous import documents provided. It would appear that of the more than 25,000 ivory pieces the store imported through Asia from Africa in the 1980s, only several thousand are still in stock. However, this retailer often described items as being from a “personal collection,” which makes tracking the origin of its products even more challenging.

Of the 47 retailers, five (11%) appear to be buying items for resale. The business models of these retailers, which include antique galleries, estate liquidators, and jewelry businesses, illustrate the potential for new products to enter into Hawai'i's market without a clear document trail as to an item's legal status and origin. In addition, it should be noted that all retailers that we surveyed appear to offer shipments to every U.S. state, despite laws in California, Washington, New Jersey, and New York that prohibit the import or purchase of these products.

In addition, only five of the 47 retailers specify restrictions on shipping their ivory products internationally.

During the initial scoping period, investigators found evidence that some outlets are responding to the shifting legal landscape for ivory sales: At least one retailer noted that it was not selling ivory products online until the legal status of ivory is resolved, while another deactivated its website between the scoping and investigation phase. Investigators found several broken links on search platforms to sites that were likely deactivated within the year. At least one retailer advertised “fake” ivory products online, but, during a follow-up call by local investigators, indicated that it had real ivory products in stock and was willing to e-mail product descriptions and process a sale over e-mail. We omitted such retailers from further investigation for purposes of this analysis; however, complementary on-the-ground investigations are likely to reveal an even larger ivory marketplace than what is found online.

ONLY 1 OF THE 47 RETAILERS PROVIDED SUPPLEMENTAL LEGAL DOCUMENTATION





CONCLUSION

These findings make it clear that there is a significant online market for ivory and related wildlife products in Hawai'i. Though we limited our investigation to only 47 online retailers and individual sellers in the state over six days, we found more than 4,600 items worth over \$1.2 million. The overwhelming majority of products were advertised as elephant ivory. In general, the retailers failed to provide sufficient evidence that the carvings they offered for sale had been imported in accordance with federal law. Thus,

we conclude that Hawai'i remains a likely location for sales of ivory that was imported illegally.

The poaching crisis faced by African elephants today is driven by demand for their tusks, and online markets like the ones covered in this investigation help to fill this demand. Moreover, the general lack of documentation from the online retailers that we scrutinized could allow recently poached ivory to be sold side by side with truly antique ivory, confusing law

enforcement officers and consumers alike.

With New York and California passing ivory bans in the last two years, Hawai'i now constitutes the largest remaining ivory market in the United States. Hawai'i should do its part to protect African elephants by enacting a ban of its own. By halting ivory sales in the state, Hawai'i would be directly helping to protect one of the world's most iconic species from being driven to extinction for the sake of trinkets, decorative statutes and jewelry.



WITH NEW YORK AND CALIFORNIA PASSING IVORY BANS IN THE LAST TWO YEARS, HAWAII NOW CONSTITUTES THE LARGEST REMAINING MARKET IN THE UNITED STATES.

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