



Help save elephants by contributing to the European Commission's consultation on ivory trade in the EU

Who can participate?

The European Commission has called on citizens, organisations and other stakeholders to participate in an [online consultation](#) to gather information and views on ivory trade in the EU and the actions that the EU should take against ivory trafficking.

When?

Responses can be submitted until 8th December 2017.

Why does the consultation on ivory trade matter?

Elephants are facing their worst crisis in decades due to poaching for their ivory. African savannah elephants have been decimated by one third in seven years, while 65% of the forest elephant populations have been wiped out largely by poachers. At least 20,000 African elephants continue to be killed each year. The ivory trade funds transnational organised crime, costs the lives of rangers dedicated to protecting wildlife, and is damaging communities and the economies of developing countries.

Across Europe, ivory continues to be traded on-line, in auction house and markets. Many EU Member States continue to permit domestic and international trade in alleged old ivory items, including export to the main markets for illegal ivory such as China and Hong Kong. There has been increasing recognition that the legal trade in ivory stimulates demand and provides a cover for the laundering of illegal ivory. Several governments with significant ivory markets are taking steps to end the ivory trade within their borders. China will be closing down its ivory market by the end of 2017. On 6th October, the UK government launched its own consultation on proposals to introduce a near total ban on UK ivory sales. France has introduced stricter rules and tightened controls on sales. However, the rest of the EU is lagging behind and without concerted action by the EU, progress in the global fight to curb ivory trafficking may be hampered.

You can encourage the European Commission to take the strongest possible action to end the ivory trade and elephant poaching by participating in the consultation.

How can you submit your contribution?

Complete the EU Commission's [online consultation](#) in English, French, German, Italian, Portuguese or Spanish.



Suggested responses

- **Section A *Information about the respondent.**

Questions 1, 4, 6, 7, 8, are compulsory and should indicate your personal information.

- **Section B Information about your involvement in trade.**

Questions should reflect the interest of the submitter.

- **Section C Information on the illegal trade of ivory in the EU.**

If you are interested in answering the open question in this section please consult our selection of documents provided below.

We do not provide you with a standard response for these questions because they have been framed in a way that it is impossible even for experts working in this field to properly respond. We regret that the European Commission has not yet published detailed data on the scale of legal and illegal ivory trade. Therefore, if you answer these questions in Section C, we encourage you to call on the Commission to publish detailed data on ivory seizures by EU Member States, and the number of permits issued for legal trade in the EU, information that is currently held by Member State government agencies.

- **Section D: Below are some suggested answers to some of the key questions in section D, and some background information to assist you in completing the form.**

D: EU priorities in relation to ivory trade

1. Which of the following do you think should be the priorities for the EU and EU Member States in relation to tackling the illegal trade in ivory within/to/from the EU? *(Please tick the appropriate boxes)*

	This should be the main Priority Action	This should be pursued together with other priority actions	This should not be a priority	Don't know
Better enforcement of the existing EU regulations and guidelines for the trade in ivory		X		
Educating and raising awareness on the existing EU regulations and guidelines among ivory traders/customers to promote legal trade			X	
Banning all ivory trade to, from, and within the EU	X			
Banning raw ivory trade to, from and within the EU		X		
Banning trade in ivory within the EU, with well-justified exemptions		X		
Banning (re-)export of ivory from the EU, with well-justified exemptions		X		



Suggested responses

2.-4.: How much do you agree or disagree with the following statements?

Question	Suggested response
2. "Illegal trade in ivory in the EU represents a marginal problem compared to the global ivory trafficking problem. Rather than changing the EU rules on ivory trade, the EU priority should be to provide support for actions against ivory trafficking in other regions (in particular, Africa and Asia), which are more important as countries of origin and destination markets for illegal ivory trafficking."	Option 5: Strongly disagree
3. "The current EU regulations are sufficient to ensure that the EU domestic elephant ivory market does not contribute to illegal international trade in elephant ivory. Rather than changing the rules, the priority should be that people are fully aware of these rules and that they are better enforced".	Option 5: Strongly disagree
4. "The current EU regulations are not sufficient to ensure that the EU domestic elephant ivory market does not contribute to illegal international trade in elephant ivory. Further restrictions on ivory trade should be put in place at the EU level to address the problem".	Option 1: Strongly agree

5. In your opinion, should the EU further limit intra-EU trade in elephant ivory? If so, what should such restrictions consist of?	YES. The EU should ban all ivory trade.
6. In your view, which of the following ivory items should be exempt from any further regulations or guidelines regarding trade within the EU? (Select all that apply)	Option 7: Other items (<i>please specify below</i>): antique items containing a very small proportion and quantity of ivory, e.g. inlaid furniture or musical instruments
8. In your opinion, should the EU further limit elephant ivory trade TO and FROM the EU? If yes, what should such restrictions consist of?	YES. The EU should ban all ivory trade.
9. In your view, which of the following, if any, ivory items should be exempt from any further regulations or guidelines regarding the re-export of worked ivory from the EU to countries outside the EU? (Select all that apply)	Option 6: Other items (<i>please specify below</i>): antique items containing a very small proportion and quantity of ivory, e.g. inlaid furniture or musical instruments
10. In your view, which of the following, if any, ivory items should be exempt from further regulations or guidelines regarding the import of ivory to the EU from countries outside the EU? (Select all that apply)	Option 7: Other items (<i>please specify below</i>): antique items containing a very small proportion and quantity of ivory, e.g. inlaid furniture or musical instruments
11. What impact (e.g. financial, logistical, environmental) would possible further EU regulations or guidelines on import, re-export and/or intra-EU trade of ivory have on you or your organisation?	Option 5: Substantial positive impact
12. What impact would possible further EU restrictions on import, re-export and/or intra-EU trade of ivory have on elephant poaching and international illegal trade of ivory?	Option 5: Substantial positive impact



Background information on the ivory trade and elephant poaching:

Reports:

- [EU ivory trade: The need for stricter measures](#)
 - [Illegal trade seizures: Elephant ivory in Europe](#)
 - [Ivory seizures in Europe 2006-2015](#)
 - [EU ivory trade kills elephants](#)
 - [A rapid survey of UK ivory markets](#)
- Ivory is one of the most frequently seized illegal wildlife products in the EU. In 2016 the EU experienced a record number of large seizures of illegal ivory. Illegal ivory has also been documented in trade in EU auction houses, shops and via online traders. Worked ivory objects and tusks have both been seized in the EU and at EU borders, because sale, import or export was found to be illegal. Also, ivory exported from the EU has been seized in importing countries such as China and Vietnam.
 - In the ten years between 2006 and 2015, the EU was by far the largest international exporter of legal elephant ivory, including tusks as well as carved ivory. The major importers were China and Hong Kong, both of which play key roles in illegal ivory trafficking. As China and Hong Kong are closing their ivory markets, the EU's continued trade in ivory could undermine the efforts of these jurisdictions to combat ivory trafficking and reduce demand for ivory.
 - Illegal ivory is almost impossible to differentiate from legal, older ivory. Traffickers use a variety of methods to make new, poached ivory to appear old, such as staining it with tea. Permits and certificates are currently not required in the EU for antique ivory and can easily be forged.
 - Legal ivory markets are fuelling global demand for ivory products from legal and illegal sources. They have been shown to provide a cover for illegal trade, compromise enforcement and undermine global efforts to close all ivory markets. Ivory trafficking is a global problem, requiring a global solution.
 - Various resolutions passed in recent years have called on governments to close ivory markets. This includes European Parliament resolutions, a motion by the International Union for Conservation of Nature (IUCN) World Conservation Congress and a resolution at the 17th meeting of the Conference of the Parties to CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora, Res. 10.10), which was endorsed by the United Nations General Assembly this year. The EU risks losing credibility when telling other countries to close their domestic ivory markets but doing nothing about its own market.

For additional information and contact details please see:

<http://www.bornfree.org.uk>

<https://davidshepherd.org/news>

<http://www.eia-international.org>

<http://www.eurogroupforanimals.org/news>

<http://www.hsi.org/world/europe/>

<http://www.ifaw.org/european-union/frontpage>

<https://www.prowildlife.de>

<http://www.robindesbois.org>

<https://brussels.wcs.org>