

ANTIQUÉ DEALERS AND IVORY TRADE

2017 – 2018 Investigation into the sale of ivory
in Australian antique shops

Submitted to the Parliamentary Joint Committee on Law Enforcement
into the trade in elephant ivory and rhino horn

June 2018



International Fund for Animal Welfare

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EXECUTIVE SUMMARY

Australia is now one of the few developed nations that has not taken any steps to address domestic ivory trade, despite there being a flourishing market for ivory trinkets. Over the years, IFAW has been monitoring auction houses, online market platforms and antique dealers and can conclusively report that there is a demand for, and plentiful supply of ivory and rhinoceros horn here in Australia.

Recent IFAW investigations include:

- [Click to Delete](#) – published May 2014
- [Under the Hammer](#) – published September 2016

Building on our previous investigations, which focused primarily on bricks and mortar auction houses and online platforms, IFAW wanted to investigate the role of the antiques' trade in the sale of ivory and rhinoceros horn.

To this end, in July and August 2017, IFAW undertook an initial investigation of antique shops in Sydney and Melbourne. The objective of this preliminary investigation was to look at both the prevalence of ivory and rhinoceros horn for sale, and the type of information and knowledge readily available at the point of sale when potentially purchasing these items. This small-scale investigation focused on specifically targeting the antique dealers' knowledge of domestic and international trade requirements as laid out by the Australian Federal Government.

The Sydney and Melbourne report was previously submitted to the Federal Department of the Environment and Energy in August 2017.

Then, in April and May 2018, in order to obtain a fuller national picture, IFAW undertook a further investigation of antique shops in Perth, Adelaide, Hobart, Canberra, Brisbane and the Australian Antique and Art Dealers Association (AAADA) Antiques Fair in Melbourne <https://aaada.org.au/melbourne/>. This document combines both the reports.

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METHODOLOGY

In both investigations, a similar methodology was employed. In the 2017 investigation, two investigators (a French volunteer and a British contractor) attended a range of antique shops in city centres and surrounding suburbs to meet with sellers face-to-face. The investigators presented themselves as either students or visitors looking for a gift for one of their grandmothers whilst holidaying in Australia.

The 2018 investigation was undertaken by a British contractor posing as a tourist wanting to buy her mother a birthday present to take back to the UK.

For both investigations, individual antique shops were sourced initially from the AAADA website, the leading industry body representing Antique and Fine Art dealers in Australia. Retailers were also found via online searches and through word of mouth recommendations from antique dealers during the investigation. Additional targets were also identified whilst out in the field.

At all times, antique dealers were asked the same questions and the investigators made no attempt to coerce dealers to respond in a certain way. However, in some cases, questions had to naturally be adapted as part of the conversation flow. Dependent on how the conversation transpired, in most instances, the investigators showed little understanding of ivory trade regulations to ensure that they did not influence the outcome.

Questions were developed to allow us to assess sellers knowledge of:

- Australian Government export and import regulations
- Convention on the International Trade of Endangered Species (CITES) permits
- The Department of the Environment and Energy Wildlife Statutory Declaration
- Provenance of items for sale

List of questions asked:

- How old is this ivory item?
- Can I travel overseas with ivory?
- Do I need any documentation to travel with ivory?
- How can you prove this item is antique?
- Price when not displayed

A visual overview including photographs of many of the items found are included in this report along with a detailed table of findings.

The findings of all of these investigations are outlined in this report and have been included in IFAW's submission to the Parliamentary Joint Committee on Law Enforcement inquiry into the trade in elephant ivory and rhinos horn and have been provided to relevant authorities for further investigation.

PART 1

26 – 27 JULY 2017

31 JULY – 1 AUGUST 2017

SYDNEY

MELBOURNE

SUMMARY

OVERALL SUMMARY SYDNEY AND MELBOURNE

- Out of 25 shops visited, 16 sold elephant ivory
- All items were made of worked ivory
- The overall number of items for sale was a minimum of 199 lots
- Prices ranged from \$47- \$250,000*
- Overall price \$350,572**
- The average price per lot over the two cities was \$1,761

OVERALL ADVICE

- Elephant ivory items were readily available across both cities. Knowledge of the legal requirements for exporting ivory was diverse and, in most cases incorrect.
- In some cases sellers readily gave illegal advice or encouraged the potential purchaser not to abide by CITES requirements for exporting antique ivory items.
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's Wildlife Statutory Declaration.

FIVE MOST EXPENSIVE ITEMS FOUND FOR SYDNEY AND MELBOURNE

- Statue \$250,000 (Ref 24)*
- Section of carved ivory tusk \$12,600 (Ref 8)
- Carved ivory item (unknown) \$5,000 (Ref 22)
- Long ivory carving \$4,500 (Ref 3)
- Bangles and brooch \$3,000 each (Refs 2, 4)

* A statue for sale was priced at \$250,000. Given that ivory accounted for less than 50 percent of the item, we have assumed that the value is in the statue not the ivory.

** This is a very conservative estimate as the price of many of the items wasn't visible or marked.

SYDNEY: Key findings from investigation

26 – 27 July 2017

OVERVIEW

- Out of 10 shops visited, eight sold elephant ivory
- All items found were made of worked elephant ivory
- Prices ranged from \$75 – \$12,600
- The overall number of items for sale was a minimum of 119 lots
- Overall price estimate \$45,870*
- The average price per item was \$385

ADVICE GIVEN

- Overall, when asked about the possibility to take the ivory abroad, the sellers gave very different recommendations. It would be fair to say that no dealer ever disclosed the fully correct requirements for a buyer wanting to take an item overseas.
- In some cases recommendations were given on how to get round export regulations.
- One seller stated that ivory was completely banned. (Ref 6)
- Two sellers referred to CITES in conversation, but never outlined the need for a permit to take the item out of Australia. (Refs 6, 9)
- Five out of 10 sellers gave illegal export advice, among which:
 - Two sellers advised the investigators if questioned, to claim that the item was bone. (Refs 2, 7)
 - Three sellers advised the investigators to wear the ivory items when going through customs and insinuate that the item was a family heirloom. (Refs 1, 3, 5)
- Four out of five sellers offered to provide a receipt or document stating that the item was antique. All claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 1, 2, 3, 9)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's Wildlife Statutory Declaration.

ITEMS ON SALE

Elephant ivory

- Three sections of carved tusks (Refs 8, 9)
- Jewellery included bracelets, bangles, earrings, brooches, necklaces and pendants (Refs 2, 3, 4, 5, 7, 8, 9)
- Three baby rattles (Refs 1, 2)
- Two potential netsuke (Ref 3)

Other wildlife species found for sale

- One tiger head (Ref 9)
- One mountain lion skin (Ref 9)
- One pair of earrings made of walrus ivory (Ref 4)
- Two carved mammoth teeth (Ref 9)
- One carved buffalo horn (Ref 11)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.



SYDNEY: Overview of ivory items found in antique stores

26 – 27 July 2017

██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 4

The seller offered to provide a receipt, but we'd have to organise and pay for a separate valuation to prove the items were antique. There were several items of sale ranging in price from \$1,200 – \$3,000.

████████████████████
VISITED 26 JULY 2017
REFERENCE NUMBER 8

The seller claimed to have 'paper' certifying that \$12,600 tusks were antique, however no provenance was displayed. And there was no mention of paperwork for the bracelets.

████████████████████
VISITED 26 JULY 2017
REFERENCE NUMBER 1

The seller claimed to have smuggled the rattles in from the UK.

██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 9

The seller claimed to have provenance for the tusks, proving that they did not date prior to 1980 (date at which elephants got protected according to him). The paperwork was not displayed.

No documentation was mentioned for the smaller items.

There were several items for sale ranging in price from \$575 - \$3,500.



██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 7

The seller told the investigators to say item(s) was either an heirloom or bone.



██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 2

The seller offered to certify that the brooch was Victorian without any proof.



██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 5

The investigators noted that this seller had a large amount of items for sale ranging in price \$195 - \$3,000. The seller recommended that the investigators wear any item(s) built.



██████████
VISITED 26 JULY 2017
REFERENCE NUMBER 3

This seller had a large amount of items for sale ranging in price from \$350 - \$4,500 and recommended that the investigators either hide or wear the item(s).



SYDNEY: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
1	[REDACTED]	Antique	26/7/17	Yes - worked	<ul style="list-style-type: none"> - 2 baby rattles - 2 needles (\$160 each) 	No	No
2	[REDACTED]	Antique	26/7/17	Yes - worked	<ul style="list-style-type: none"> - 2 big ivory bangles (\$3,000 each) - big ball necklace - big necklace with face-shaped pendant (all ivory) - 2 magnifying glasses with ivory handles - 2 brooches (\$650 and \$950) - 1 baby rattle 	Yes	Seller said the brooch was "probably" from the Victorian era, and then quickly offered to write a receipt stating that it is from the Victorian era.
3	[REDACTED]	Antique	26/7/17	Yes - worked	<ul style="list-style-type: none"> - 1 ivory bangle (\$1,800) - 2 ivory beads (\$1,250) - 2 pendants (\$350 each) - 1 pair of earrings (\$650) - 1 French ivory jewel casquet (\$950) - 1 game made of ivory (long rectangular carved piece) (\$1,600) - 2 Asian-style statues (potentially netsukes) - 1 knife and one fork (\$75 each) - long ivory carving (\$4,500) 	Not all of them	Origin of certain items, including French jewel casquet, was discussed.
4	[REDACTED]	Antique	26/7/17	Yes - worked	<ul style="list-style-type: none"> - 3 brooches (\$1,200 and \$3,000) - 4 pairs of earrings (different shapes such as elephants) - 1 camel statue 	Yes	Seller was not completely sure of the items' origin.

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller said "we can make you a document saying that the item is more than a 100 years old".	No	INCORRECT Seller first said that it was banned to export/import ivory across countries, and he seemed sceptical about the possibility to take an ivory item abroad. Seller said that even with a 'document', going through customs would be a hassle so he advised us to wear the ivory repeatedly.	He openly admitted having smuggled two baby rattles from the UK to Australia "3 weeks ago" by putting them "in his pocket". He said he could write us a note asserting that the object is antique (more than 100 years old). He recommended not to claim the GST back at customs · He advised the investigators to wear the ivory items when going through customs.	He gave us the name of two other shops selling ivory (that we then inspected: Karen Deakins and Victoria & Albert).	No
No documentation No paperwork	Seller said she would write a receipt stating that it is from the Victorian era.	No	INCORRECT Seller said as long as we've got a 'note' from her, we could go through customs easily.	At first she advised us to say the product was made of bone, and then she offered to write a paper for us stating that the object was from the Victorian era.	One of the brooches was not on display.	No
No documentation No paperwork	Seller said she would write a receipt saying it's antique.	No	CORRECT Seller said new ivory is forbidden everywhere (to be sold or exported), but it's not the case for antiques.	Even with a 'receipt', going through customs can become "a hassle" so she suggested to hide it or wear it. She said do not bother claiming back your GST as the item could be confiscated.		No
No documentation No paperwork	Seller offered to provide receipt from the shop but then the customer would have to get the item valued (for \$150) to guarantee that it is antique.	No	INCORRECT Seller said long as you have the proof that it is antique, you can take the item out of the country.			Yes: – 1 pair of earrings of walrus ivory – 1 bone brooch

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
5	[REDACTED]	Antique	26/7/17	Yes - worked	A lot of ivory items including: - around 20 bangles - earrings - necklaces - ornament - little statues Price range: \$195 to \$3,000	Yes	All items originated in Africa and China. General dates given but seller suggested that we receive confirmation from an independent valuer.
6	[REDACTED]	Jewellery & Antiques	26/7/17	No	N/A	N/A	N/A
7	[REDACTED]	Jewellery & Antiques	26/7/17	Yes - worked	Two brooches (\$2,200 and \$700)	No	Seller stated that one of the brooches was made in France between c18th - c19th.
8	[REDACTED]	Jewellery	26/7/17	Yes - worked	- 1 section of a carved tusk (\$12,600) - 2 bracelets (\$115 and \$250)	No (the objects were labelled but no mention of ivory)	Carved tusk dated back to the c18th but no information was offered for bracelet.
9	[REDACTED]	Antique	26/7/17	Yes - worked	- 2 sections of carved tusks (more than 1kg each) (\$2,600) - 2 ivory puzzles - 1 taj mahal statue - 2 ivory fan-shaped sculptures - 3 bangles - 1 bracelet - 1 hindu-type sculpture (\$575 - \$3,500 each)	Yes	Yes for the tusks: from Africa, circa 1965
10	[REDACTED]	Antique	27/7/17	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Not discussed	No	CORRECT Seller said new ivory cannot be transported in/out of the country but antique ivory can. There was no reference to CITES permit INCORRECT Two sellers had different advice; one of the sellers suggested we get the item validated by an antique expert and then check the domestic legislation.	One of the two sellers said: "just wear the bracelet. Say it's from my grandma, what are you going to do about it?"	The second seller was quite pushy for us to buy the ivory bracelet.	
N/A	N/A	Yes	INCORRECT Seller said there was a ban on ivory and referred to Australia, the US, France, Europe: "The ban on transporting ivory across countries is applicable even if the ivory is antique".		He said: if you have some ivory, you cannot sell it but you can only give it to members of your family. He advised us to look up CITES regulations.	
No documentation No paperwork		No	INCORRECT When probed, seller said "ivory is illegal in most countries". Australia was not specifically mentioned. She said you do not need 'paperwork' when taken through customs.	She advised to say any item was made from 'bone' or that it was ours from a long time ago.	When asked about export requirements, she focused on GST.	No
Documentation for the tusk No paperwork		No	INCORRECT When asked if we could take the bracelet back home, he said "of course". When asked about the paperwork to take the bracelet back home, he said "a tax invoice will allow you to claim your tax back."		The seller said 'antique' meant more than 100 years old and was not forthcoming about giving out information on ivory items.	
Documentation for the tusks No paperwork		Yes (for elephant, tiger and lion)	INCORRECT He said a receipt from their antique shop should be enough to go through customs with a small item, except to go to China and the US (because these countries banned ivory completely)	With regards to the tiger head, he said "don't take this out of the country". The tiger head has now been removed.	Big shop, ivory items openly displayed in two cabinets. He sources his items from China, Spain, the US and Bangkok (while he also said that it was illegal to import ivory there). He was quite eager to show us the other wildlife products he had.	Yes: - 1 tiger head - 1 mountain lion skin - 2 carved mammoth teeth
N/A		N/A	N/A	N/A	The seller said there are so many regulations surrounding ivory that they do not sell ivory in the shop. She mentioned the possibility to go to prison for selling ivory, implying if you do not have a certain "license" to sell ivory. She mentioned that auction houses do sell ivory: she prefers not buying ivory in case the auction house does not have the right paperwork. More bric-a-brac than antique.	Yes: - 1 carved buffalo horn

MELBOURNE: Key findings from investigation

31 July – 1 August 2017

OVERVIEW

- Out of 15 shops visited, eight sold elephant ivory
- All items found on sale were made of worked elephant ivory
- Prices ranged from: \$47 – \$250,000
- The overall number of items for sale was a minimum of 80 lots
- Overall price estimate Melbourne \$304,702*
- The average price per item was \$3,808

ADVICE GIVEN

- Like Sydney, when asked about the possibility to take the ivory abroad, the sellers gave very different recommendations. It would be fair to say that no dealer ever disclosed the fully correct requirements for a buyer wanting to take an item overseas.
- In some cases recommendations were given on how to get round export regulations.
- One seller differentiated between antique, vintage and new ivory. (Ref 22)
- No shop gave correct export advice.
- Two out of 15 sellers mentioned CITES unprompted. (Refs 23, 26)
- Six out of 15 sellers gave illegal export advice:
 - Three sellers advised the investigators to wear the item when travelling or pretend the item was made of another material if asked by customs. (Refs 20, 25, 26)
 - One seller offered to falsify a note stating that the item is made of "bone". (Ref 22)
 - One seller advised to wear the item through customs. (Ref 24)
 - One seller advised the investigators not to declare the item at customs altogether. (Ref 23)

ITEMS ON SALE

Elephant ivory

- One carved section of a tusk (Ref 22)
- Jewellery (Refs 20, 22, 24, 25, 26)
- Small carvings (Refs 20, 22, 23, 24)
- Approximately 10 potential netsukes (Ref 23)
- Large statues partially made of ivory (Ref 24)
- Perfume bottles with a lid partially made of ivory (Ref 27)

Other wildlife species found for sale

- Ten whale teeth (Refs 22, 23, 24)
- Three raw walrus tusks (Ref 22)
- A few items covered in "shagreen" i.e. shark skin (Ref 27)
- One carving made of mammoth ivory and one cigarette holder made of mammoth ivory (Refs 22, 25)
- A number of shops sold a lot of taxidermy products (Refs 13, 21)

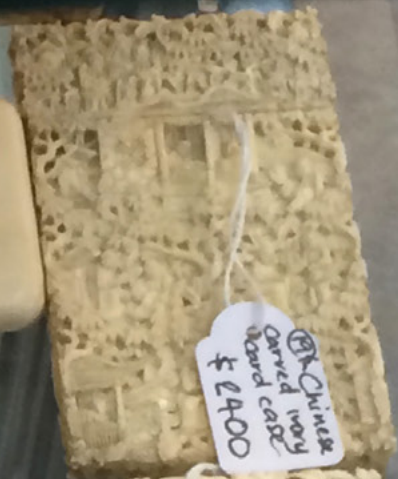
* This is a very conservative estimate as the price of many of the items wasn't visible or marked.



19th Imp'd
Silver + ivory
card case
\$ 396



19th Ivory
Chinese card
case
\$ 1250



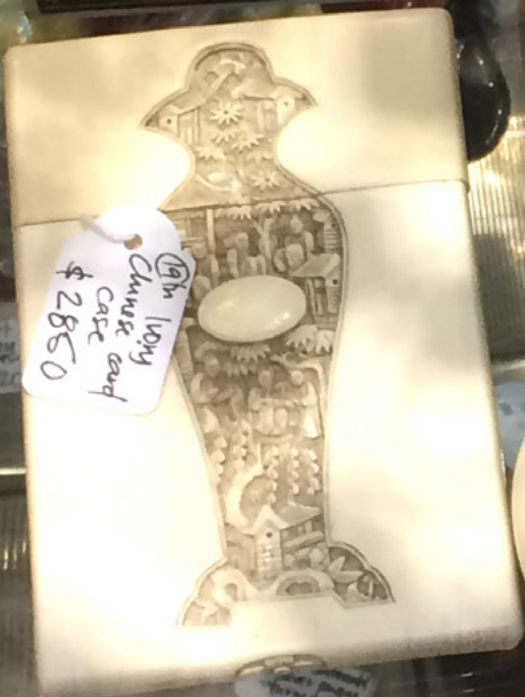
19th Chinese
carved ivory
card case
\$ 2400



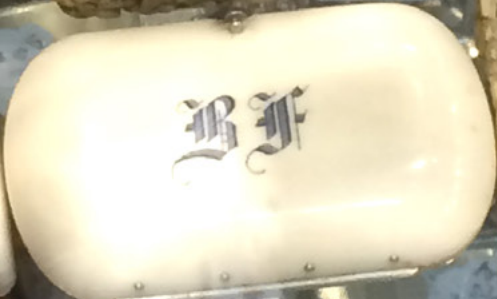
19th Chinese
carved ivory
card case
\$ 5200



19th carved
ivory card
case
\$ 2600



19th Ivory
Chinese card
case
\$ 2850



19th Ivory
case
\$ 1100



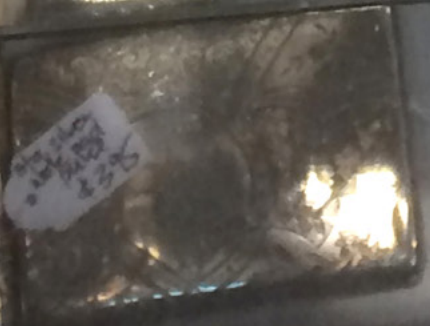
19th Chinese
ivory card
case
\$ 5400



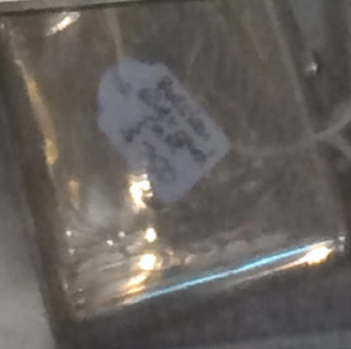
Victorian
Tortoise Shell
case
\$ 1100



Australian
cetonia whale
bone box
\$ 560



19th Silver
case
\$ 230



19th Silver
case
\$ 230

19th Silver
case
\$ 230

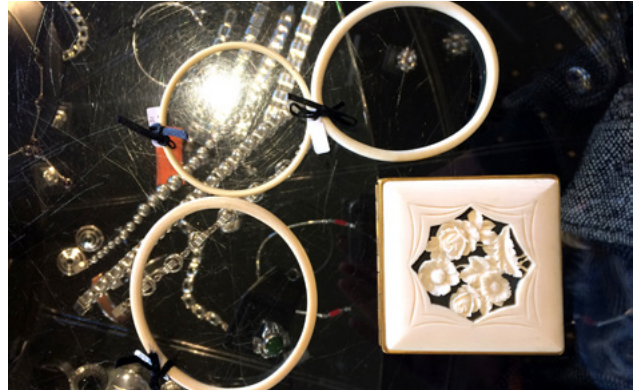
██████████
VISITED 1 AUGUST 2017
REFERENCE NUMBER 27

The seller said the investigators could not travel at all with ivory. However, went on to advise that they could potentially put it their suitcases, but she did not recommend it as customs could confiscate it.



██████████
VISITED 1 AUGUST 2017
REFERENCE NUMBER 25

The seller told investigators to wear the item/s or say that the items were plastic if asked.



██████████
VISITED 1 AUGUST 2017
REFERENCE NUMBER 24

The seller advised the investigators to wear the item. This antique dealer profited \$1.1 million from selling a fake painting in 2016 ██████████

██████████
██████████ He was not charged as he was an intermediary dealer.



██████████
VISITED 1 AUGUST 2017
REFERENCE NUMBER 26

The seller referenced CITES but said "no one [dealers] has them [paperwork]." Also advised investigators to wear the items or say it's plastic.



MELBOURNE: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
13	[REDACTED]	Antique and Bric-a-brac	31/7/17	No	N/A	N/A	N/A
14	[REDACTED]	Antique and Art	31/7/17	No	N/A	N/A	N/A
15	[REDACTED]	Jewellery	31/7/17	No	N/A	N/A	N/A
16	[REDACTED]	Jewellery	31/7/17	No	N/A	N/A	N/A
17	[REDACTED]	Jewellery	31/7/17	No	N/A	N/A	N/A
18	[REDACTED]	Antique jewellery	31/7/17	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	No	CORRECT You cannot import ivory unless it is antique and you have the right paperwork proving it is antique.	N/A	He said in general, there was no legislation concerning mammoth ivory.	Yes: – Many types of taxidermy items – Camel bone boxes
N/A	N/A	No	N/A	N/A	Seller did not let us in the shop after we described what we were looking for. She said she did not have any ivory because of the 'regulations' in place but did not expand.	N/A
N/A	N/A	No	N/A	N/A	Seller said there were "many bans" in the world. He said you cannot import ivory in Australia but you can export it if there is no ban in the importing country.	N/A
N/A	N/A	No	N/A	N/A	Seller said it was very difficult to find ivory now. She was unresponsive to any other questions.	No
N/A	N/A	No	INCORRECT Seller said ivory is completely forbidden in Australia.	N/A	Seller informed us that there was as a "bone" bracelet at the other Keshett shop in Little Collins Street. This was not mentioned by the seller whilst we were there. (We spotted a possible carved bracelet which could be what she was referring to).	No
N/A	N/A	No	INCORRECT Import is forbidden in Australia but any ivory items can be taken outside of Australia, depending on the legislation of that country. No mention of the required age of the ivory.	N/A	He signposted other antique dealers in the city which possibly sell ivory.	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
19	[REDACTED]	Antique jewellery	31/7/17	No	N/A	N/A	N/A
20	[REDACTED]	Antique	1/8/17	Yes - worked	Small selection of ivory items including an elephant brooch (\$65), and other little statues	Yes	Did not discuss provenance despite enquiry
21	[REDACTED]	Antique furniture	1/8/17	No	N/A	N/A	N/A
22	[REDACTED]	Antique centre	1/8/17	Yes - raw walrus tusk; worked elephant ivory	<ul style="list-style-type: none"> - Between 50 - 100 carved ivory items including statues, card holders, earrings, necklaces, games, snuff boxes etc - Section of carved elephant tusk shaped as a crocodile. This was approx 30cm long. (Price range: \$150 - \$5,000). 	Yes	Seller discussed the origin of some items but not completely sure of dates. He admitted to having 'new' ivory but did not specify exact dates. Some ivory was referred to as 'vintage' which the seller defined as '1960s - 1990s'.
23	[REDACTED]	Gallery specialising in ethnographic art	1/8/17	Yes - worked	<ul style="list-style-type: none"> - Approx 10 Japanese figures (potentially Netsuke) (\$450 each) - 2 carved Chinese ladies 	Yes	Discussed - dates attached to items

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	No	CORRECT Seller said only antique ivory can be legally sold. Paperwork is essential to prove it is antique and compliant with the law.	N/A	She commented that there are antique dealers that have been known to lie about the nature of ivory. Some dealers state that ivory is in fact bone. This seller refuses to sell ivory, despite owning a few items "upstairs". She said she has refrained from selling those items because she feels morally compromised. She does not want to support the trade. The seller said it was "too much of a worry" to take any ivory outside of Australia, even with the correct documentation.	No
No documentation No paperwork		No	N/A	Seller simply said "wear it or say it's plastic" when asked about taking the ivory through customs.	Did not seem worried at all about getting the ivory through customs without any documentation.	No
N/A	N/A	N/A	N/A	N/A	Large shop with no ivory displayed, but other taxidermy and products derived from wildlife. Photos available from the IFAW investigators. We talked to two sellers and none of them directed us towards ivory items. Very unresponsive sellers.	Yes: - Boxes made of tortoise shell - Crocodile (taxidermy)
No documentation No paperwork	He said he would write us a "note"	No	INCORRECT When asked about the differences between antique and new ivory, he said it was fine to export antique ivory. (However, the phrasing of our question could have influenced his answer.) He advised us to check France's legislation but did not give accurate information about Australian legislation.	He said he would write us a "note" saying the item was bone. He advised not to claim GST when asked whether we were allowed to take this item outside of Australia.	Seller referred to "new ivory" pieces. Given the nature of the conversation, it was difficult for the investigators to determine if he meant "new" to the shop, or made from newly manufactured ivory. He said it was "very difficult to tell" what was new and antique ivory. He sources his products from over 50 antique dealers therefore he didn't have thorough knowledge of every item.	Yes: - 3 walrus tusks - 4 whale teeth - (at least) 1 carved item identified as mammoth ivory
Yes documentation No paperwork	Seller said he could prove the origin of the product and would "fill in a form" to accompany the item. He did not say there was a form for each item on display.	Yes	INCORRECT Seller said antique ivory "should be good" with the correct form explaining the origin of the product	He advised us not to declare any ivory at customs. This seller already arrested for smuggling antiquities across countries: [REDACTED] [REDACTED] [REDACTED] [REDACTED]	Fairly knowledgeable of ivory legislation in Australia. He advised us to go to the Antiques Centre (that we visited already) to find more ivory objects	Yes: - 4 whale teeth (raw) dating back to when Australia still whaled

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
24	[REDACTED]	Antique	1/8/17	Yes - worked	<ul style="list-style-type: none"> - 1 brooch entirely made of ivory (\$850) - 1 statuette of an African woman (\$1,200) - 1 toothpick box (\$650) - Other larger statues partially made of ivory (less than 50%) (\$45,000-\$250,000) 	No (objects not labelled at all)	Yes
25	[REDACTED]	Jewellery Art Deco	1/8/17	Yes - worked	<ul style="list-style-type: none"> - 3 bangles (\$47-\$80) - 1 necklace (\$450) 	Yes	All items in the shop dated to the Art Deco era (1920s)
26	[REDACTED]	Antique furniture	1/8/17	Yes - worked	<ul style="list-style-type: none"> - 1 bangle made partially of bone and ivory (\$180) - 1 necklace made partially of bone and ivory (\$80) 	Yes	Seller was unsure of the exact origin/date of his ivory items on display
27	[REDACTED]	Antique furniture	1/8/17	Yes - worked	- 2 little perfume bottles with the lid partially made of ivory (\$500)	Yes	Not discussed

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
Yes documentation (larger statues) No paperwork	Seller said he could prove the larger statues were antique because he's got a picture of them "in the book".	No	INCORRECT When asked about the right to export ivory, he said he "wasn't sure". Quickly after though, he stated: 'of course you can take it (talking about the brooch) back home, just wear the bloody thing!'	Because there is a "global embargo" on ivory everywhere in the world, the seller advised me to wear the brooch when I go abroad	No mention of the Australian legislation, simply a reference to the "global embargo" on ivory. Seller said 'antique' refers to an item more than 100 years old. John Playfoot, the owner of Memphis One, was involved in an investigation into fraudulent paintings. [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]	Yes: – 2 carved whale teeth
No documentation No paperwork	Seller said she would write us an invoice saying that it is antique	No	INCORRECT She said she would not recommend us to transport an "object" (such as tusks) but for a "piece of jewellery, it will be fine"	She advised us to say at customs that it was either our own piece of jewellery or that it was made from celluloid (plastic material used in the 1920s to imitate ivory)	She sourced her products from "all over the world": France, New York City, Miami	Yes: – 1 mammoth ivory cigarette holder
No documentation No paperwork	Seller admitted the need to have a CITES certificate which states the date of the product, but he said "no one has them"	Yes		Seller advised us to say to custom agents, if asked, that the product was made of "plastic". He also recommended us to wear the jewel.	He buys his products in Australia, mostly from Chinese people. He does not import his products. He does not specialise in ivory but 'picks up pieces' due to the growing demand in Chinese communities.	Yes: – 3 tortoise shell boxes
No documentation No paperwork	Not discussed	No	INCORRECT Seller said we could not travel at all with ivory. She said we could potentially put it in our suitcase, but she did not recommend it as customs could confiscate it. Even antique ivory could be taken from you by customs.		The item in question was made of "shagreen" i.e. shark skin: the seller did not confirm the species of shark used.	Yes: – A few items covered with 'shagreen' priced up to \$5,000

PART 2

APRIL – MAY 2018

PERTH

ADELAIDE

HOBART

CANBERRA

BRISBANE

AAADA FAIR MELBOURNE

SUMMARY

OVERVIEW

- Out of 121 shops visited, 72 sold elephant ivory
- All items were made of worked ivory. The overall number of items observed for sale was a minimum of 555 lots, with the most items being found in Brisbane (225)
- Prices ranged from to \$24 for an ivory ring to \$17,500 for a pair of ivory ladles
- The overall estimated price of items observed was \$330,198*
- The overall average price per item was \$594

THE FIVE MOST EXPENSIVE ITEMS FOUND

1. \$17,500 for a pair of Anglo-Indian ivory ladles c1790 (Ref 102)
2. \$16,000 for an unknown hospital instrument in gold and ivory, England c1770 (Ref 102)
3. \$8,995 for a piano with ivory keys 1908 (Ref 58)
4. \$7,700 for a statue of a lady on a lotus flower (Ref 93)
5. \$7,000 for a large ivory statue (no photo) (Ref 72)

ADVICE GIVEN

There was overall very limited knowledge about the age, legality and need for provenance documentation. The investigator was provided with lots of varying, vague, incorrect and often illegal advice. At times the investigator was told to either just wear the item, hide in luggage, claim ignorance or that's it's bone, plastic or another material, if asked.

There was some knowledge that the laws on ivory were changing but mainly piecemeal bits of information, with the correct answer seldom being provided. Views ranged from there being an imminent global ban to it just being some US states that had bans. Some sellers offered to google the information but, even then, were unable to find the correct information easily, one claiming "It's impossible to get a Yes or No answer." (Ref 11)

- Overall, 53 out of 72 sellers provided incorrect and illegal export advice.
- Only four sellers specifically referred to CITES in conversation. (Refs 14, 28, 62, 73)
- One seller was aware of the need for a CITES certificate, said it was an expensive and lengthy process, of up to three months. (Ref 62)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
- Many sellers commented how difficult or impossible it is to tell the age of ivory.
- Not one person actually offered any conclusive proof of provenance. In the most part, people considered a receipt to be sufficient documentation to take the item to the UK.
- There was very little awareness of the extent of poaching crisis and that elephants are still being killed to supply ivory.
- From the investigator's observations, there were very few sellers whose ivory collection was substantial enough to form a significant proportion of their overall profits (Refs 79, 85, 93)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.

PERTH: Key findings from investigation

17 – 19 April 2018

OVERVIEW

- Out of 26 shops visited, 13 sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale was a minimum of 62 lots.
- Prices ranged from \$25 for a brass and ivory spoon to \$895 for a pair of ivory earrings
- The overall estimated price of items observed was \$6,800*

ADVICE GIVEN

- Overall, when asked about the possibility of taking ivory back to the UK, the sellers gave very different recommendations. It would be fair to say that no dealer ever disclosed the fully correct requirements for a buyer wanting to take an item overseas.
- Only one seller referred to CITES in conversation, but never outlined the need for a permit to take the item out of Australia, advising that a receipt would be sufficient documentation. (Ref 14)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
- Two sellers were aware of the US state bans but not the imminent UK ban. (Ref 14, 20)
- In some cases, outlined in the table attached, recommendations were given on how to get around export regulations.
- All 13 of the sellers gave some sort of illegal export advice, among which:
 - Not one seller advised the investigator to declare the item.
 - Two sellers advised the investigator that, if questioned, to claim that the item was "bone" (Refs 9, 11, 19)
 - One advised to say it's "xylonite" (Ref 16)
 - Six sellers advised to hide in luggage. (Refs 3, 6, 11, 14, 16, 25)
 - Two sellers advised the investigator to wear the ivory items when going through customs. (Refs 9, 20)
 - Three sellers offered to provide a receipt or document stating that the item was antique. All claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 1, 3, 14)

ITEMS ON SALE


Elephant ivory

- Jewellery included bracelets, bangles, earrings, brooches, necklaces and pendants.
- Other items included cigarette holders, cutlery, ornaments, statues, glove stretchers, penknives, manicure sets and napkin rings.

Other wildlife species found for sale

- Whale bone (Refs 8, 13)
- Swordfish (Ref 9)
- Carved horns (Ref 8)
- Crab claws (Ref 12)
- Turtle shell (Ref 14)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.



SUBIACO ANTIQUES
FRENCH SILVER SERVING
SET c/1860's Ivory Fork +
Spoon. EMPIRE STYLE HANDLES
#890 -

PERTH: Overview of ivory items found in antique stores

17 – 19 April 2018

████████████████████
VISITED 18 APRIL 2018
REFERENCE NUMBER 1

The seller told the investigator "All of the ivory is from the UK, imported by an Englishman. It's all pre-1947, it has to be for him to be able to bring it here." The seller advised "It's fine to take back with you I would write you a note." But didn't mention need for a certificate.



████████████████████
VISITED 17 APRIL 2018
REFERENCE NUMBERS 3

The seller advised investigator that it was "No problem to take back to the UK, just put in your cabin baggage. It's antique (British Victorian) so no problem."



████████████████████
VISITED 17 APRIL 2018
REFERENCE NUMBER 8

The seller, said that the elephant brooch and earrings were "ivory, I know it's a big no no". The seller went on to say they are "Victorian or whatever the boss says".



[REDACTED]
VISITED 17 APRIL 2018
REFERENCE NUMBER 6

The seller advised investigator not to declare item on the grounds that "they won't be looking for ivory and what they don't know won't hurt them. Often full disclosure isn't a good idea." The seller cited an example of US customs recently smashing a "poor lady's teapot as it had an ivory handle."



[REDACTED]
VISITED 18 APRIL 2018
REFERENCE NUMBER 7

After googling the legality of taking it back to UK, the seller advised investigator that "It's illegal from Africa or China but fine from Australia." The seller said that they didn't have any documentation as "they weren't antique guild members."



[REDACTED]
VISITED 19 APRIL 2018
REFERENCE NUMBER 9

The seller advised investigator to "just wear it (bangle) with a long sleeved top, it won't show up on security... Or you can do what the Chinese do and hide in your luggage. I can write on receipt that its either antique or bone."



[REDACTED]
VISITED 18 APRIL 2018
REFERENCE NUMBER 11

The seller thought this brass and ivory spoon was 1950s but wasn't sure, saying "anything over 50 years old is antique." Export laws were googled, and having seen the UK ban, the seller said: "its not in place yet so should be OK. it's impossible to get a Yes or No answer." After consulting with the boss, the seller said it would "probably be OK taking back to UK. Customs can tell how old it was by sight... just take label off and put in luggage."



██████████
VISITED 19 MAY 2018
REFERENCE NUMBER 14

When investigator asked if the ivory cigarette holder could be taken to UK, the seller said "Here's the score: CITES says anything before 1937 worked is fine, 1971 if unworked." Its only really five US states that you need to worry about. Items are probably British anyway! It's fine, just put in your luggage no-one will know and I'll write on receipt that it's antique."



██████████
VISITED 17 APRIL 2018
REFERENCE NUMBER 16

The seller advised investigator "I'll leave the label on that will be enough. A colleague advised to "Just pop in make-up bag, they will be none the wiser. If they ask, just tell them its xylonite."



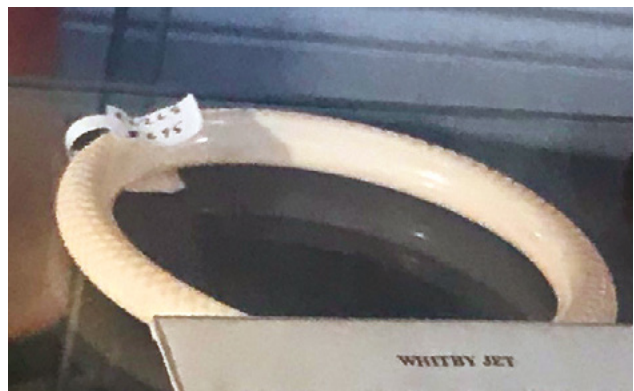
████████████████████
VISITED 17 APRIL 2018
REFERENCE NUMBER 18

The seller said that the sale of ivory is banned interstate and "they are talking about banning it altogether soon, but probably be OK if you just claim ignorance" The seller said that "China is the problem, smuggling new ivory and encouraging poachers."



██████████
VISITED 18 APRIL 2018
REFERENCE NUMBER 19

The seller said that bracelet was "pretty old, 1920s" and advised investigator to "just say its bone its easier with all the paranoia about ivory , particularly if you're taking back to the UK."



VISITED 18 APRIL 2018
REFERENCE NUMBER 20

The seller offered to write that the item was antique on the receipt. The seller also advised that it would be "best to wear it, less questions and you avoid VAT too."



VISITED 18 APRIL 2018
REFERENCE NUMBER 25

The seller advised investigator, "its very old (ivory pendant), from before the poachers came, the elephant died of old age." The seller added, "No problem at all taking back to the UK, just pop in your luggage."



SUMMARY

- All 13 of the sellers gave some sort of illegal export advice.
- Two sellers advised the investigator to claim that the item was bone, one to say it's 'xylonite'.
- Six sellers advised to hide in luggage, two advised to wear the items.
- Three offered to provide a receipt or document stating that the item was antique, claiming this would be sufficient evidence of legality.
- Not one seller specifically mentioned the need for a Wildlife Statutory Declaration.

PERTH: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
1	[REDACTED]	Antiques and Collectables	19/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory bangle (\$750) - Ivory carved heart pendant (\$395) - 2 ivory crucifix pendants (\$200-\$300) 	Yes	Seller said that all the ivory is from the UK, imported by an Englishman. She said that "its all pre-1947, it has to be for him to be able to bring it here."
2	[REDACTED]	Antiques and Vintage	19/4/18	No	N/A	N/A	N/A
3	[REDACTED]	Antique jewellery shop	17/4/18	Yes - worked	<ul style="list-style-type: none"> - 2 ivory bangles (\$95 each) - Ivory cross pendant (not visible) - Cameo pendants and rings (seller said some were ivory) 	Yes - bangles No - cameo pendants	Enquired about bangle. Seller said it was ivory and British Victorian. She also said some of the cameo rings and pendants were ivory but I didn't see any labelled.
4	[REDACTED]	Antique furniture shop	18/4/18	No	N/A	N/A	N/A
5	[REDACTED]	Antiques and Asian Artefacts	19/4/18	No	N/A	N/A	N/A
6	[REDACTED]	Antiques	17/4/18	Yes - worked	<ul style="list-style-type: none"> - Japanese Ivory statue (\$295) - Carved ivory drop earrings (\$895) - Puzzle ball earrings (\$345) - Carved ivory earrings (\$395) - Ivory handled silver knife (\$95) - Carved puzzle ball 1870 (\$295) 	Yes	The only item dated was the puzzle ball c1870. The jewellery was described as Art Deco.
7	[REDACTED]	Antiques and Vintage	18/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory letter opener - Ivory elephant brooch (\$79) - Japanese ivory and silver pendant (\$175) - A couple of unlabelled carvings and a napkin ring maybe bone 	Yes - brooch and pendant No - letter opener and carvings	When asked where the brooch was from and how old the seller said 1940s probably. When a different seller in the adjoining room was asked about the ivory pendant, she said "Ooh I'm not sure 30s or 40s maybe."
8	[REDACTED]	Antique jewellery shop	17/4/18	Yes - worked	Small selection of ivory items including: <ul style="list-style-type: none"> - Elephant brooch (\$200) - Elephant earrings (\$95) 	No	Seller, whose boss owned two shops said that the elephant brooch and earrings were "ivory, I know it's a big no no". She went on to say they are "Victorian or whatever the boss says"

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Some, she said that it has to be pre-1947 to bring from or to the UK.	No	CORRECT Seller said that it had to be pre-1947 to export to the UK. INCORRECT Seller advised that it "would be fine to take back with you I would write you a note" But no mention of a certificate.	Seller said that a note from her would be sufficient but didn't mention certification.	Generally quite knowledgeable about the dates and law but not of the need for provenance documentation.	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller said that I could "absolutely travel back with it no problem it will say on receipt it's antique. Put in cabin baggage.	No	INCORRECT Seller said that I could "absolutely travel back with it no problem it will say on receipt it's antique. Put in cabin baggage."	Seller said to just put in cabin baggage no need to declare it. Receipt saying its antique will be sufficient.	Seller did say that some of the cameo rings and pendants were ivory - some priced up to \$15,000 but I'm not sure and I didn't see any labelling.	No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork		No	INCORRECT Seller said "Oh what they don't know won't hurt them. Often full disclosure isn't a good idea. They won't be looking for ivory."	Seller advised not to declare item.	Seller said "I'm not sure about the UK, but US customs recently smashed the ivory handle of a teapot that a lady tried to take through poor lady. Banning it will just send prices up." She went on to say that she chooses not to wear ivory.	No
No documentation No paperwork	Seller said he didn't know if it would be OK to take back to UK as "every country's customs is different." The other seller advised that it was "probably safer to buy bone."	No	INCORRECT The other seller advised that it was "probably safer to buy bone." She said she didn't know what the laws were taking into UK and googled it. She found online that "It's illegal from Africa or China but fine from Australia."	After googling legality of taking it back to UK she advised that "It's illegal from Africa or China but fine from Australia." She said that they didn't have any documentation as "they weren't antique guild members."		Yes: - what looked like 1 whale tooth - 1 carved horn thistle brooch - carved horns
No documentation No paperwork	No	No	INCORRECT Seller said that its antique so "no problem taking back to the UK."	Seller said there would be no problem no need to declare it.	Seller said that all the cameo brooches were stone, whereas the owner said that some of them were ivory.	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
9	[REDACTED]	Antiques	19/4/18	Yes - worked	Lots of ivory including: - 1 ivory cigarette holder (\$120) - 1 ivory and silver manicure set (\$590) - 1 ivory glove stretchers (\$149) - 1 ivory letter opener - Ivory boxes (\$280) - Ivory statues (\$370) - 3 elephant ornaments and dragon carving - 1 ivory elephant ivory bangle (with holes) (\$350) - 1 large African ivory bangle (\$750) - 1 twisted ivory bangle (\$230) - 1 ivory cribbage board (\$390)	Yes	When asked about the bangles, the seller said they were "c19th, maybe c20th."
10	[REDACTED]	Antiques and Vintage	19/4/18	No	N/A	N/A	N/A
11	[REDACTED]	Antiques and Furniture Restoration	19/4/18	Yes - worked	- 1 small brass and ivory handled spoon (\$25)	Yes	Seller said she thought it was 1950s but wasn't sure but said that "anything over 50 years old is antique."
12	[REDACTED]	Antiques Auctions and Dealers	19/4/18	No	N/A	N/A	N/A
13	[REDACTED]	Antique furniture shop	18/4/18	No	N/A	N/A	N/A
14	[REDACTED]	Antique Shop	19/4/18	Yes - worked	- 1 ivory elephant arch carving - Late c19th ivory and plate knife rests (\$85) - 1 c19th Chinese ivory cigarette holder (\$195)	Yes	Seller advised items were "probably British and c19th"

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller pointed to one of the bangles and said "That's the oldest so probably the safest to take back with you. But I'm not sure I'll call the owner," I was then told that the owner wasn't sure either but that he can "write on receipt that its either antique or bone."	No		Seller advised that it would be safest to take the oldest bangle back with me. He went on to say "Or just wear it with a long sleeved top it won't show up on security. Or you can do what the Chinese do and hide in your luggage."		Yes: – Inuit eskimo whale bone carving (\$290)
No documentation No paperwork	N/A	No	N/A	N/A	N/A	No
No documentation No paperwork	Had to google and consult with boss before advising investigator.	No	CORRECT Seller advised correct date for UK, pre-1947.	After consulting with boss, she said it would "probably be OK taking back to UK." She added that "customs would be able to tell how old it was by sight." She googled laws and it came up with the news that the UK was banning ivory. She commented that "this is only recently so its not in place yet. Items have to be before 1947." She said that it was "impossible to get a Yes or No answer."		Yes: – Swordfish horn/bill with teeth (\$110)
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	When asked if ivory cigarette holder could be taken to UK, seller said "Here's the score: CITES says anything before 1937 worked is fine, 1971 if unworked." He added "Its only really five US states that you need to worry about. Items are probably British anyway!"	Yes		Seller advised to put in luggage and that a receipt saying its antique would be sufficient provenance documentation.		Yes: – A pair of crab claws (\$27.50)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
15	[REDACTED]	Antiques and clocks	18/4/18	No	N/A	N/A	N/A
16	[REDACTED]	Antiques and Collectables	17/4/18	Yes - worked	- 1 pair of ivory glove stretchers 1900 (\$95)	Yes	Seller said they are c1900 and "it has to be pre-1947 for us to sell it."
17	[REDACTED]	Antiques and Collectables	19/4/18	No	N/A	N/A	N/A
18	[REDACTED]	Antiques and Collectables	17/4/18	Yes - worked	- Selection of ivory carvings (\$200 each) - Ivory crane statue c19th (\$200) - Napkin rings (\$295) - Ivory handled serving set (\$175) - Ivory handled carving set (\$225)	Yes	All around c19th
19	[REDACTED]	Antique jewellery shop	18/4/18	Yes - worked	- Ivory bracelet (\$695) - 2 ivory carvings (approx. \$600) - Ivory letter opener (approx. \$600) - Ivory cigarette holder (approx. \$600)	Yes	Seller said that bracelet was "pretty old, 1920s."
20	[REDACTED]	Antique jewellery shop	19/4/18	Yes - worked	Lots of ivory jewellery including: - African ivory beads c1930 (\$250) - Silver and ivory necklace 1960s (\$255) - Brooch vintage (not sure if ivory) (\$590) - 2 ivory and gold rings (\$75 and \$135) - Ivory cross pendant (\$110) - Ivory heart pendant (\$59) - French silver and ivory serving set (\$890) - Statue (suspect ivory couldn't see tag)	Yes	Seller advised the necklaces were "Vintage 1960s the other 1930s." He wasn't sure where they are from.
21	[REDACTED]	Antique furniture shop	18/4/18	No	N/A	N/A	N/A
22	[REDACTED]	Antiques and Collectables	19/4/18	No	N/A	N/A	N/A
23	[REDACTED]	Antiques	17/4/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork		No	CORRECT Seller advised correct date for UK, pre-1947. INCORRECT Seller advised that she would leave label on and that would be enough. Her colleague advised that I put in my make up bag and, if asked, say its xylonite.	Seller advised that she would leave label on and that would be enough. Her colleague advised that I put in my make up bag and, if asked, say its xylonite.	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	Yes: - Vintage Aboriginal painted turtle shell (\$320)
No documentation No paperwork		No	INCORRECT Seller said that the sale of ivory is banned interstate and "they are talking about banning it altogether soon." When asked if he meant nationally or globally and he replied "Globally I think." He said he was unsure about the UK laws. "	Seller advised that it would "probably be OK if you just claim ignorance"	Seller said that "China is the problem, smuggling new ivory and encouraging poachers."	No
No documentation No paperwork		No	INCORRECT Seller advised to "just say its bone, easier with all the paranoia about ivory, particularly if you're taking back to the UK. "	Seller advised to "just say its bone, easier with all the paranoia about ivory, particularly if you're taking back to the UK."	Hard to take photos very small shop.	No
No documentation No paperwork	He wasn't sure where items were from.	No	INCORRECT The female seller advised that it was "fine taking back to the UK, its only the US that have a problem. The British are far more reasonable as they've grown up with it and understand its history and heritage." He advised that it would be "best to wear it, less questions and you avoid VAT too."	Advised it would be "best to wear it less questions and you avoid VAT too."	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
24	[REDACTED]	Antiques and Interior Design	19/4/18	No	N/A	N/A	N/A
25	[REDACTED]	Antiques and Collectables	18/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory elephant pendant (\$185) - Penknives (not sure if ivory) 	Yes - pendant	
26	[REDACTED]	Antiques and Collectables	18/4/18	Maybe - worked	<ul style="list-style-type: none"> - 1 unlabelled penknife (\$110) that looked like it could either be ivory or bone. - 1 unlabelled necklace (\$55) that looked like it could either be ivory or bone. 	No	Seller said of necklace "I hope its not ivory I really should know." She tested it with her teeth and concluded that it wasn't.

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
Yes documentation No paperwork	Seller said "its very old, from before the poachers came, elephant died of old age."	No	INCORRECT Seller said "oh no, no problem at all taking back to the UK, just pop in your luggage."	Seller advised not to declare it and just put in luggage.		No
No paperwork		No				No

ADELAIDE: Key findings from investigation

20 – 22 April 2018

OVERVIEW

- Out of 20 shops visited, 14 sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale observed was a minimum of 78 lots
- Prices ranged from \$24 for an ivory ring to \$1,595 for an ivory necklace*
- The overall estimated price of all items observed was \$10,950**

ADVICE GIVEN

- Overall, when asked about the possibility of taking ivory back to the UK, the sellers gave very different recommendations. It would be fair to say that no dealer ever disclosed the fully correct requirements for a buyer wanting to take an item overseas.
- One seller did admit to the investigator that he didn't have any provenance documentation to prove the item's age, so he didn't want to sell it to her if she was planning on taking it overseas, stating that "It's illegal to buy ivory now or bring into the country." (Ref 37)
- Only one seller referred to CITES in conversation and said that a 'CITE' (sic) certificate was required to export the item but that he didn't have one. Although, he went on to say "You could just wear it and hide under your clothes." (Ref 28)
- Not one seller specifically mentioned the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
- In some cases, recommendations were given on how to get around export regulations.
- Thirteen out of the 14 retailers gave some sort of illegal export advice, among which:
 - Not one seller advised investigator to declare the item.
 - One seller advised the investigator if questioned, to claim that the item was bone and that he would write "bone" on the receipt. (Ref 32)
 - One advised to say it's plastic. (Ref 42)
 - One advised to say it's "ivory" and to "plead the Fifth, ignorance is best policy". (Ref 36)
 - Six sellers advised to hide in luggage. (Refs 28, 29, 31, 33, 34, 44)
 - Five sellers advised the investigator to wear the ivory items when going through customs. (Refs 28, 33, 40, 41, 42)
 - Three sellers offered to provide a receipt or document stating that the item was antique. All claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 29, 31, 45)

* There was one item (a large figurine) for sale for \$4,250. This figurine featured a small ivory sword which made up less than five per cent of the total size so has not been included in the price range as it's likely that the value is in the figurine rather than the ivory component.

** This is a very conservative estimate as the price of many of the items wasn't visible or marked.

ITEMS ON SALE

Elephant ivory

- Jewellery included bracelets, bangles, earrings, brooches, necklaces and pendants.
- Other items included a jewellery box, cut-throat razors, cocktail sticks, letter openers, napkin rings, a pipe, statues, crucifix, shoe horn, pens and tools, glove stretchers, ebony elephants with ivory tusks, cutlery, ornaments, statues, glove stretchers, a bookmark and paperweights.
- The investigator also found netsukes, puzzle balls and snuff bottles.

Other wildlife species found for sale

- Shark jaw \$395 (Ref 45)
- Taxidermy turtle \$34 (Ref 45)
- Taxidermy NT Freshwater crocodile \$650 (Ref 45)
- Taxidermy crocodile (Ref 42)
- Whales tooth (Ref 28)
- Seahorses (Ref 42)
- Coral (Refs 44, 45)
- Tortoiseshell and ostrich feather fan (Ref 29)
- Buffalo horn (Ref 40)

ADELAIDE: Overview of ivory items found in antique stores

20 – 22 April 2018

[REDACTED]
VISITED 21 APRIL 2018
REFERENCE NUMBER 28

The seller advised investigator "No you can't take it (necklace) back you would need a CITE (sic) certificate ... I can't give you one I don't have one." A colleague interjected "Then why are you selling it then?!" The seller then said "you could just wear it and hide under your clothes." The colleague advised to "put in your jewellery box but they might confiscate it."



[REDACTED]
VISITED 22 APRIL 2018
REFERENCE NUMBER 29

The seller advised investigator "It's old (necklace) so OK. There is a cut-off date but I can't remember what it is." The seller said "I can just write a receipt saying 1900 to be safe. Just put in your luggage you'll be fine."



[REDACTED]
VISITED 22 APRIL 2018
REFERENCE NUMBER 31

When asked how old it has to be, the seller replied "I don't know, just modern, just wrap them up in your luggage and I'll write you a note to say they are 100 years old, it will be fine." The seller advised investigator that "its only modern ivory that's not allowed. These (cocktail sticks) are coloured so you can tell they aren't modern."



[REDACTED]

VISITED 22 APRIL 2018
REFERENCE NUMBER 32

The seller advised the investigator that "its pre-1947 so OK, "no problem at all you can take it back to the UK or sell it ... just wear it through customs." Additional advice given was that it was only the modern stuff they worry about and burn, and fair enough. To be safe I can write 'bone' on the receipt."



[REDACTED]

VISITED 22 APRIL 2018
REFERENCE NUMBER 33

The seller advised that "Its fine after 1947 you can buy or sell. You can tell its old by the colour its obvious." Commenting that "It's the Chinese that are the problem it's a shame."



[REDACTED]

VISITED 22 APRIL 2018
REFERENCE NUMBER 34

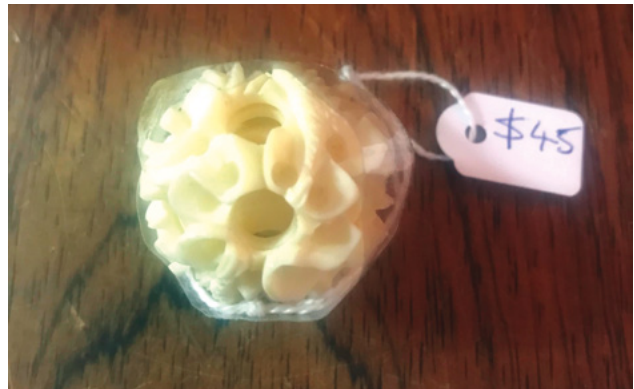
When asked about proof of age, the seller advised investigator "It's got a stamp on it saying it's 100 years old that should be OK but I'm not sure." The seller advised investigator "best to put in your luggage, don't carry with you."



[REDACTED]

VISITED 22 APRIL 2018
REFERENCE NUMBER 35

A Chinese devil or puzzle ball, made of four concentric carved ivory balls. The seller told investigator "it should be OK as it's pre-1975 but I don't have a certificate or anything."



VISITED 21 APRIL 2018
REFERENCE NUMBER 36

The seller advised to "plead the Fifth" and that "ignorance is best policy." The seller advised investigator to "put (earrings) in jewellery box and say they are 'ivorine' and cost \$20. The worst they can do is confiscate them and give you a slap on the wrist," going on to say, "actually, let's rewind this conversation, ask me again 'Can I take back to the UK?' "Yes absolutely they're ivorine."



VISITED 22 APRIL 2018
REFERENCE NUMBER 37

The seller admitted to not having any provenance documentation so didn't want to sell it to investigator as it "wasn't worth getting confiscated." The seller said "I used to buy lots of ivory but it's illegal to buy it now so I can't bring it into the country."



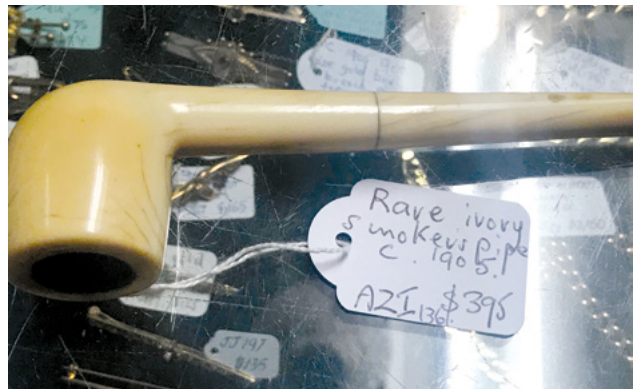
VISITED 20 APRIL 2018
REFERENCE NUMBER 40

The seller told the investigator that her boss brings ivory from the UK so "it should be OK to take it back." Her boss "just wear it, its only scrimshaw that customs are worried about, not pre-made jewellery."



VISITED 21 APRIL 2018
REFERENCE NUMBER 41

The seller advised investigator to "just wear it (ring)" and that there was "no problem, no need for proof."



VISITED 22 APRIL 2018
REFERENCE NUMBER 42

None of the items were clearly labelled ivory but looked very much like it. The seller confirmed that the elephant pendant was ivory when asked. "It's very old 100 years old, anything pre-1970 is fine. I can give you one of my business cards to prove it's antique." The seller advised investigator to "Just wear it, say you think its plastic, just don't say anything don't declare it."



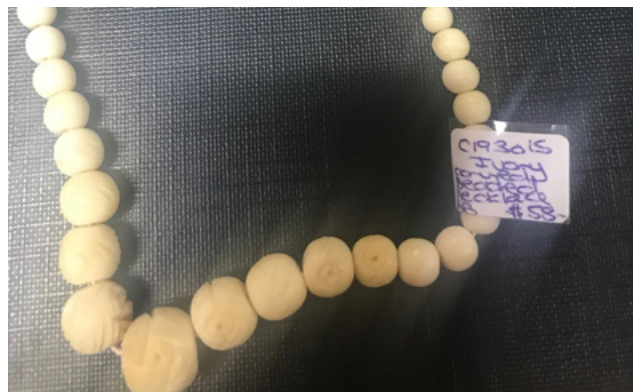
VISITED 22 APRIL 2018
REFERENCE NUMBER 44

The seller advised investigator that "It's fine to take back with you it's before 1940s. You don't need anything." "I wouldn't even declare it just pop in your luggage it's so small no-one will find it."



VISITED 22 APRIL 2018
REFERENCE NUMBER 45

The seller advised investigator "I don't see why you can't take it (necklace) back to UK, its antique, I'll leave label on and I'll give you a receipt."



SUMMARY

- Fourteen out of 20 antique shops visited had ivory items for sale
- Items ranged in price from \$30 to \$1,595
- Not one seller provided correct export advice, referenced CITES or mentioned the need for a Wildlife Statutory Declaration
- Thirteen out of the 14 sellers gave some sort of illegal export advice
- One dealer advised the investigator to claim that the item was bone and that he would write 'bone' on the receipt
- One advised to say it's plastic, another to say it's 'ivorine'
- Six sellers advised to hide in luggage

ADELAIDE: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
27	[REDACTED]	Antique furniture shop	22/4/18	No	N/A	N/A	N/A
28	[REDACTED]	Antique shop	21/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory necklace (\$1,595) - Small ivory bangle (\$125) - Large ivory bangle (\$165) 	Yes	Seller advised that the ivory necklace was "very old, 100 years."
29	[REDACTED]	Antiques and Collectables	22/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory glove stretchers (\$150) - Ivory necklace (1920s) (\$200) - Ivory napkin holder (Price unknown) 	Yes	<ul style="list-style-type: none"> - Necklace 1920s - Glove stretchers Birmingham UK 1915
30	[REDACTED]	Antiques	21/4/18	No	N/A	N/A	N/A
31	[REDACTED]	An antique stall in a large market	22/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory cocktail sticks (\$175 for six) - Puzzle ball on stand (Price unknown) - Elephant ivory brooch and earrings (\$98) - Brooch (suspect ivory) (Price unknown) - Ivory letter opener (\$175) - Ivory book mark (\$128) 	Some	On enquiry about the cocktail sticks, seller didn't know where they were from but said that they were old, adding "They are coloured so you can tell they're not modern."

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller was unsure and had to check with owner re taking back to UK. Owner said "No you can't take it back you would need a CITE certificate." When asked what that was and can he provide me with one and he replied "No I can't give you one, I don't have one." The seller interjected "Then why are you selling it then?" To which he replied "What kind of question is that?!"	Yes	CORRECT Seller said that it wasn't possible to take necklace back to the UK without a 'CITE' (sic) certificate.	Seller went on to say "you could just wear it and hide under your clothes." Shop assistant advised to "put in jewellery box but they might confiscate it."		Yes: – Part of whale tooth (\$285)
No documentation No paperwork	Seller advised "It's old (necklace) so OK. There is a cut-off date but I can't remember what it is."	No	INCORRECT Seller said "I can just write a receipt saying 1900 to be safe. Just put in your luggage you'll be fine."	Seller advised that a receipt would be sufficient evidence to export it and advised to just put in luggage.		Yes: – Victorian tortoiseshell and ostrich feather fan (\$210)
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller said that "it's only modern ivory that's not allowed. These (cocktail sticks) are coloured so you can tell they aren't modern." When asked how old it has to be, seller replied "I don't know, just modern, just wrap them up in your luggage and I'll write you a note to say they are 100 years old it will be fine."	No	INCORRECT Seller advised to "just wrap them up in your luggage and I'll write you a note to say they are 100 years old it will be fine."	Seller advised to "just wrap them up in your luggage and I'll write you a note to say they are 100 years old it will be fine."		No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
32	[REDACTED]	Antique stall in market	22/4/18	Yes - worked	<ul style="list-style-type: none"> - 2 ivory netsukes 1900 (\$275 and \$215) - 2 ivory puzzle ball necklaces (\$65 and \$45) - Ivory ring (\$24) 	Yes	<ul style="list-style-type: none"> - The netsukes were labelled 1900 - The jewellery didn't have dates
33	[REDACTED]	Antique stall in market	22/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory flower earrings and brooch - Ivory water carrier brooch - Ivory ball earrings - (\$40-70) 	No	Not labelled
34	[REDACTED]	Antiques and Collectables	22/4/18	Yes - worked	- Antique ivory cutthroat razor (\$42)	Yes	Seller advised that it was over 100 years old. Wasn't sure where its from.
35	[REDACTED]	Antique shop	22/4/18	Yes - worked	- 1 carved ivory puzzle ball (\$45)	No	Seller said its pre-1975
36	[REDACTED]	Antiques shop	21/4/18	Yes - worked	<ul style="list-style-type: none"> - 1970s silver and ivory earrings (\$108) - Mini ivory rule measure (\$120) 	Yes	Earrings were labelled as 1970s, ruler not.
37	[REDACTED]	Antique shop	22/4/18	Yes - worked	<ul style="list-style-type: none"> - Vintage ivory earrings (\$75) - Selection of ivory elephant ornaments (\$45 each) - Ivory cross (\$140) - Ivory bangle (\$160) - Ivory necklace (\$130) - Ivory letter opener (Price unknown) - Ivory and glass necklace (\$75) - Ebony elephants with ivory tusks (\$165) - 3 ivory snuff bottles (\$350 each) - 3 ivory netsukes (\$230 one netsuke, others price unknown) 	Yes	On enquiring about vintage necklace, seller wasn't sure of its age.
38	[REDACTED]	Antique and auction dealer	21/4/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised that "it's pre-1947 so OK. It's only modern stuff they worry about and burn, and fair enough. To be safe I can write 'bone' on the receipt."	No	CORRECT Seller said it had to be pre-1947 to export to UK but no mention of need for documentation. INCORRECT Seller offered to write bone on the receipt to be safe.	Seller offered to write bone on the receipt to be safe.		No
No documentation No paperwork	Seller advised that "Its fine after 1947 you can buy or sell. You can tell its old by the colour its obvious."	No	CORRECT Seller advised correct 1947 date but didn't mention need for documentation. INCORRECT Seller advised "No problem at all you can take back to UK or sell it." She advised to "just wear it" through customs.	Seller advised to "just wear it " through customs.	Seller said "It's the Chinese that are the problem it's a shame."	No
No documentation No paperwork	When asked about proof of age, seller advised "Not sure its got a stamp on it saying its 100 years old that should be OK but I'm not sure."	No	INCORRECT Seller advised "best to put in your luggage, don't carry with you."	Seller advised "best to put in your luggage, don't carry with you."		No
No documentation No paperwork	Seller was aware that item needed to be pre-1975 to sell it at all. He admitted that he didn't have a certificate or any proof.	No	INCORRECT Seller said "It should be OK as it's pre-1975."	Seller said it should be OK as its pre-1975.		No
No documentation No paperwork		No	INCORRECT Seller advised to "plead the Fifth" and that "ignorance is best policy."	"Seller advised to ""put in jewellery box and say they are ivory and cost \$20. The worst they can do is confiscate them and give you a slap on the wrist."" He went on to say "Actually, let's rewind this conversation, ask me again 'Can I take back to the UK', Yes absolutely it's ivoryine."		No
No documentation No paperwork	Seller said "I used to buy lots of ivory but it's illegal to buy it now you can't bring into the country. "	No	CORRECT Seller said that he didn't have anything to prove it's age or provenance so didn't want to sell to me if I was taking out of the country as it "wasn't worth getting confiscated."	N/A	Seller admitted that he didn't want to sell to me as he didn't have anything to prove it's age.	No
N/A	N/A	N/A	N/A	N/A	N/A	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
39	[REDACTED]	Antique furniture shop	22/4/18	No	N/A	N/A	N/A
40	[REDACTED]	Antiques	21/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory handled fork (\$95) - Ivory brooch (\$18) - Ivory bangle (\$135) - Ivory and silver pendant (\$95) - Ivory and tortoiseshell jewellery box (\$135) 	Yes	On enquiring about ivory bangle and pendant, seller said she didn't know how old it was and didn't know how to date it. She said her boss brings it from the UK so it "should be fine to take back."
41	[REDACTED]	Antiques	21/4/18	Yes - worked	<ul style="list-style-type: none"> - Set of 6 Chinese ivory napkin rings (\$350) - Rare ivory smoker's pipe c1905 (\$395) - Pair of ivory carved Chinese 'Dogs of Fo' Antique (\$295) - c1930's carved ivory whale (\$235) - Carved Indian ivory brooch (\$125) - 14ct gold and ivory ring (\$125) - Ivory file (\$45) - Horseman figurine with ivory sword (<5% ivory) (\$4250) - Ivory and rosewood crucifix (\$350) - Ivory shoe horn and button hook (Price unknown) - Ivory-handled pens and tools including a Ruling Pen Middleton Engineer c1900 (\$85-\$125) - Indian ivory figurine and peacock c1920's (\$350) 	Yes all items labelled ivory	Asked about ivory ring and seller advised it was 1940s but wasn't sure where it's from.
42	[REDACTED]	Antique shop	22/4/18	Yes - worked	<ul style="list-style-type: none"> - Ivory elephant pendant (\$95) - Ivory 'mystery' ball (unlabelled) - Ivory elephant statue (\$65, mislabelled 'Mystery ball') 	No although the seller confirmed the elephant pendant was ivory when asked.	The seller said that the elephant pendant was "Very old, 100 years it has a stamp." But I couldn't see the stamp.
43	[REDACTED]	Antique furniture shop	22/4/18	No	N/A	N/A	N/A
44	[REDACTED]	Antique shop	22/4/18	Yes - worked	- 2 ivory elephant on tortoiseshell paperweights (\$60 each)	Yes	Not sure of age or origin
45	[REDACTED]	Antique Centre	22/4/18	Yes - worked	<p>Lots of ivory items including:</p> <ul style="list-style-type: none"> - c19th ivory & silver plate cutlery service (\$345) - 1890s Ivory handled bone holder (\$80) - Ivory crocodile carved fountain pen (\$75) - 1930s ivory carved beaded necklace (58) - c19th ivory knife (\$95) - Ivory napkin ring c19th (\$48) - 1900s ivory, ebony Indian jewellery box (\$475) - Vintage ivory carved beads and earrings - Some ebony elephants with suspected ivory tusks 	Yes	Mostly c18th or c19th, varying origins
46	[REDACTED]	Antiques and Vintage décor	21/4/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork		No	INCORRECT The seller said that her boss brings ivory from the UK so it should be OK to take it back. She asked her boss and he advised to "just wear it, its only scrimshaw that customs are worried about, not pre-made jewellery."	Seller advised to just wear item.		Yes: – Taxidermy crocodile – Buffalo horn
No documentation No paperwork	No understanding – seller advised there was "no problem, no need for proof."		INCORRECT Seller advised there was "no need for proof " and to "just wear it." (ring)	Seller advised there was "no need for proof " and to "just wear it." (ring)	N/A	No
No documentation No paperwork	Seller said that "anything pre 1970 is fine. I can give you one of my business cards to prove it's antique."		INCORRECT Seller advised "Just wear it, say you think its plastic, just don't say anything don't declare it."	Seller advised "Just wear it, say you think its plastic, just don't say anything don't declare it."	N/A	Yes: – Seahorses (\$35 each) – Taxidermy crocodile
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller advised that "It's fine to take back with you it's before 1940s."		INCORRECT Seller advised there was no need for documentation. "I wouldn't even declare it just pop in your luggage it's so small no-one will find it."	Seller advised there was no need for documentation. "I wouldn't even declare it just pop in your luggage it's so small no-one will find it."	N/A	Yes: – Coral necklaces (\$85)
No documentation No paperwork	No understanding		INCORRECT Seller advised OK to take back to UK and that leaving label on and having a receipt would be sufficient proof of provenance.	Seller advised that leaving label on and having a receipt was sufficient evidence of provenance.	The bazaar was a collection of individual stalls, all unmanned so I only managed to speak to the store manager/receptionist.	Yes: – Shark jaw (\$395) – Taxidermy turtle (\$345) – Taxidermy NT Freshwater crocodile (\$650) – Lots of coral (\$30-\$145)
N/A	N/A	N/A	N/A	N/A	N/A	No

HOBART: Key findings from investigation

28 – 29 April 2018

OVERVIEW

- Out of 15 shops visited, 11 sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale observed was a minimum of 60 lots
- Prices ranged from \$45 for a napkin ring to \$8,995 for a piano with ivory keys
- The overall estimated price of items observed was \$26,400*

ADVICE GIVEN

- Overall, when asked about the possibility of taking ivory back to the UK, the sellers gave very different recommendations. It would be fair to say that no seller ever disclosed the fully correct requirements for a buyer wanting to take an item overseas. Not one seller referred to CITES in conversation.
- One seller did say that he thought the laws had changed or were changing soon and that there would be a need to authenticate ivory items to export, but he wasn't sure of the details and didn't mention CITES by name. (Ref 50)
- One seller advised "I wouldn't risk taking back to the UK, I wouldn't be able to bring it into the country from the UK." When asked why, she replied "We're all part of an international treaty against ivory trade. I could get a certificate to try to prove its age but I don't know for sure how old it is and certificates are really expensive." She then went on to say, "You could just pop in your luggage." (Ref 53)
- Another seller advised of the need for a certificate to export but admitted "I don't have one, you have to buy it and I think it's expensive. It's all become very strict and complicated. It's a shame, I won't be buying ivory anymore." (Ref 51)
- One seller had the impression that all ivory exports were banned worldwide and that no ivory can be exported, not even with a certificate. (Ref 56)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
- In some cases, recommendations were given on how to get around export regulations.
- Only one seller advised investigator to declare item. (Ref 59)
- Six of the 11 ivory sellers gave some sort of illegal export advice, among which:
 - One seller advised to say it's plastic or resin. (Ref 61)
 - Four sellers advised to hide in luggage (Refs 49, 50, 52, 53)
 - One admitting "I bring all my whale bone and ivory stuff over in my suitcase the Brits don't care it's the US that's the problem." (Ref 49)
 - Three sellers offered to provide a receipt or document stating that the item was antique. All claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 47, 58, 59)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.

ITEMS ON SALE

Elephant ivory

- Jewellery included bracelets, bangles, earrings, brooches, necklaces and pendants.
- Other items included Japanese okimonos, sewing kits and instruments, cocktail sticks, a painting on ivory, picture frames, note pad, letter opener, page turner, cigarette holder, page turner, clothes brush, crucifix, napkin rings, ebony elephants with ivory tusks, a bowl, cutlery, parasol handles and an ivory wax seal.
- The investigator also found a piano with ivory keys and a selection of rattles with suspected ivory handles.

Other wildlife species found for sale:

- Tiger claw Rajasthan c 1860s 'very rare' price unknown not marked (Ref 58)
- Whale bone (Refs 49, 58)
- Porcupine quills (Ref 50)
- Coral (Refs 50, 51)
- Tortoiseshell ladies cigar case (Ref 56)

HOBART: Overview of ivory items found in antique stores

28 – 29 April 2018

██████████
VISITED 28 APRIL 2018
REFERENCE NUMBER 47

The seller told investigator "I think its fine to bring in but no idea about taking it out I think it's only new ivory that's a problem and this is old...I'm not sure how old but it's in an antique shop so it must be old. I can write a receipt for you." The seller said "its not as if elephant has been killed for it. Animals are protected now."



██████████
VISITED 28 APRIL 2018
REFERENCE NUMBER 48

Ivory cocktail sticks, not clearly labelled. When asked if they were ivory, the seller said "I assume so at that price."



██████████
VISITED 29 APRIL 2018
REFERENCE NUMBER 52

No age marked on this ivory wax seal. The seller admitted she didn't know about export laws and that investigator should check, but suggested it should be fine putting in luggage.



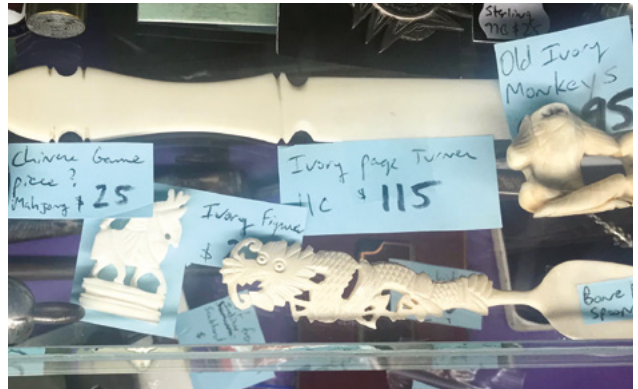
██████████
VISITED 28 APRIL 2018
REFERENCE NUMBER 49

The seller said of ivory cigarette holder "It should be fine, just pop in your luggage, don't declare it. I bring all my whale bone and ivory stuff over in my suitcase. They are talking about banning sales in all ivory that would be a shame as it would destroy history. It's not as if animals are being killed now."



██████████
VISITED 28 APRIL 2018
REFERENCE NUMBER 50

The seller initially advised investigator of the clothes brush that "It shouldn't be a problem if you just take in your luggage." The seller checked with owner who said that "laws were changing soon or may have already changed." As he couldn't authenticate the item he advised "perhaps don't risk it but it would probably be ok."



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VISITED 29 APRIL 2018
REFERENCE NUMBER 51

The seller advised investigator "I think the laws have changed...You need to get a certificate. I don't have one, you have to buy it and I think it's expensive. "It's all become very strict and complicated. It's a shame I won't be buying ivory anymore."



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VISITED 29 APRIL 2018
REFERENCE NUMBER 53

The seller advised investigator "I wouldn't risk taking back to the UK, I wouldn't be able to bring it into the country from the UK. We're all part of an international treaty against ivory trade." I could get a certificate to try to prove it's age but I don't know for sure how old it is and certificates are really expensive."



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VISITED 29 APRIL 2018
REFERENCE NUMBER 56

The seller advised investigator: "No you can't take back to the UK or anywhere." You used to be able to if it's past a certain age but they've just bought in a new rule banning all ivory exports worldwide. It's a shame. Not even with a certificate. You can buy here but you can't take overseas."



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VISITED 28 APRIL 2018
REFERENCE NUMBER 58

Lots of ivory for sale. The seller advised that a receipt and a stamp would be sufficient documentation and to call if any problems but that it "was so small (pendant), it shouldn't be a problem."



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VISITED 28 APRIL 2018
REFERENCE NUMBER 59

The seller advised investigator "it's very old (bowl) not sure how old." The investigator was advised to "carry in hand luggage and probably safest to declare it to customs. You'd have to call customs and check as I'm not sure. I can write you a letter and give you a business card."



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VISITED 29 APRIL 2018
REFERENCE NUMBER 61

The seller told investigator "I've no idea how old they (napkin rings) are or if you can take back to the UK, I'll google it." After looking online, she advised "I would just say they are plastic or resin."



SUMMARY

- Eleven out of 15 shops visited sold items made of elephant ivory
- Six of the sellers gave some sort of illegal export advice
- One seller advised to say it's plastic or resin
- Three sellers advised to hide in luggage
- Three dealers offered to provide a receipt to say the item was antique
- All claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired



HOBART: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
47	[REDACTED]	Antique Centre	28/4/18	Yes - worked	Ivory bookmark/paperclip (\$75)	Yes	Unsure
48	[REDACTED]	Antiques	28/4/18	Yes - worked	Ivory cocktail sticks (\$185)	No	Not sure not labelled
49	[REDACTED]	Antiques	28/4/18	Yes - worked	– Ivory cigarette holder – Ivory handled serving set (\$95)	Yes	Seller said the cigarette holder was old and from the UK.
50	[REDACTED]	Antiques	28/4/18	Yes - worked	– Ivory page turner (\$115) – Solid ivory clothes brush (\$55) – Carved ivory letter opener (\$175) – Ivory figurine (\$200?) – Old ivory monkeys (\$95) – Ivory button hook (\$115) – 4 ivory monkeys (\$65)	Yes	On enquiring about the clothes brush, one seller said that it was about 100 years old. Not sure where its from.
51	[REDACTED]	Antiques and Collectables	29/4/18	Yes - worked	– Victorian ivory carving set in case (\$750) – Ivory napkin ring (\$45) – Stirling silver and ivory pistol grip knives and forks (\$950) – c19th ivory bangle (\$485) – Ivory and steel knives (\$175) – Ivory handled knives (\$245) – Ivory parasol handles (\$585)	Yes	Unsure

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised that she had no idea if it was OK to take back to UK saying "I think its fine to bring in but no idea about taking it out I think it's only new ivory that's a problem and this is old I'm not sure how old but its in an antique shop so it must be old. I can write a receipt for you."	No	INCORRECT Seller offered to write a receipt as provenance documentation.	Seller offered to write a receipt as provenance documentation.	Seller said "It's not as if an elephant has been killed for it. Animals are protected now."	No
No documentation No paperwork	Seller said "I have no idea how old they are, I assume you'd be able to take back, the owners would know but they are at the markets. "	No	INCORRECT Seller said she assumed it would be OK to take back to UK, but said that owners would know but they weren't there.	Seller didn't categorically provide illegal advice she just said that she assumed it would be OK to take back and didn't mention any need for documentation.	The seller wasn't sure if the item was ivory, assumed so at the advertised price.	No
No documentation No paperwork		No	INCORRECT Seller advised not to declare item and to put in luggage.	Seller advised not to declare item and to put in luggage, admitting " I bring all my whale bone and ivory stuff over in my suitcase the Brits don't care it's the US that's the problem."	Seller said "They are talking about banning sales in all ivory that would be a shame as it would destroy history. It's not as if animals are being killed now."	Yes: – Lots of whale bone items
No documentation No paperwork	When asked if any proof was required, the seller replied "I don't think so I'll just check." She called someone who wasn't sure as "laws were changing soon or may have already changed."	No	CORRECT Owner advised that laws were changing soon and there was a need to authenticate ivory to export.	Before I asked if I needed proof, seller initially advised to "just put in luggage."	N/A	Yes: – Porcupine quills (\$25)
No documentation No paperwork	Seller advised "I think the laws have changed. It's OK for 20% figures and portraits on ivory but not these (bangles). You need to get a certificate. I don't have one, you have to buy it and I think it's expensive."	No	CORRECT Seller advised about the need for a certificate.		The seller said "It's all become very strict and complicated. It's a shame I won't be buying ivory anymore."	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
52	[REDACTED]	Antique stationary	29/4/18	Yes - worked	- Ivory wax seal (\$235)	Yes	Seller wasn't sure of its age.
53	[REDACTED]	Antiques	29/4/18	Yes - worked	- 2 ivory bracelets (\$165) - 2 child's ivory bracelets (\$48) - 2 Victorian ivory picture frames (\$235) - Ivory carved crocodile (\$65) - Ivory pendant (\$110)	Yes	On enquiring about the bracelet, seller said "It has a fair bit of age as it's yellowed. Not sure about other items - Picture frames were Victorian
54	[REDACTED]	Antiques	28/4/18	No	N/A	N/A	N/A
55	[REDACTED]	Antiques	29/4/18	No	N/A	N/A	N/A
56	[REDACTED]	Antiques	29/4/18	Yes - worked	- Late c17th oval plumbeago box in turned ivory (\$450) - Late Victorian circular ivory box British c1900 (\$230) - 2 antique ivory long beads from Naga people NE India c19th (\$240) - Assortment of antique rattles with suspected ivory handles (not labelled ivory) (\$275-\$285)	Yes apart from the rattles	Plumbeago box c17th not sure where from Circular box British c 1900 Beads c19th NE India

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller said "I know it has to be a certain age for us to be able to sell it but I can't remember, I'll google it." On looking online she said "Ah the date isn't as old as I thought, its 1978, I reckon this (seal) is 1900 so fine."	No	INCORRECT Seller admitted she didn't know about export laws and that I should check, but suggested it should be fine putting in luggage.	Seller suggested putting in luggage, but also suggested that I check UK laws.		No
No documentation No paperwork	Seller advised "I wouldn't risk taking back to the UK, I wouldn't be able to bring it into the country from the UK."	No	CORRECT Seller advised that it's illegal to import or export without a certificate proving it's age.	After explaining the legalities, the seller said "you could just pop in your luggage."	Seller had a general idea about legality of trade but not specific. Also went on to say that: "We are all part of an international treaty against ivory trade. I could get a certificate to try to prove its age but I don't know for sure how old it is and certificates are really expensive. You could just pop it in your luggage."	No
N/A	N/A	N/A	N/A	N/A	The store didn't have any ivory items on display. However, the Lauder and Howard stall at the AAADA antiques fair in Melbourne (visited 6 May) had a few items of ivory (Ref 105).	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller advised "No you can't take back to the UK or anywhere. You used to be able to if it's past a certain age but they've just bought in a new rule banning all ivory exports worldwide. It's a shame." When asked "not even with a certificate?" He replied "No not even with a certificate. You can buy here but you can't take overseas."	No	INCORRECT Seller had impression that all ivory exports were banned worldwide and that no ivory can be exported, not even with a certificate.			Yes: – Tortoiseshell ladies cigar case (\$125)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
57	[REDACTED]	Large market with a few antique stalls	28/4/18	No	N/A	N/A	N/A
58	[REDACTED]	Antiques	28/4/18	Yes - worked	<p>Lots of ivory items for sale including:</p> <ul style="list-style-type: none"> - Ivory 'palanquin' (litter) carving (\$790) - Ivory tatting shuttle 1830s (\$225) - Ivory sewing clamp mid 1800s - Antique Palais Royale Mother of pearl and ivory sewing kit 1869 (\$1,375) - Fan (think ivory but not labelled) (\$225) - c18th painting on ivory (\$675) - Georgian (1820s) ivory desk seal (\$475) - Japanese ivory Okimono wood cutter (\$690) - 1860s ivory note pad (\$265) - 1940s Japanese ivory Okimono (\$300) - Carved figurine of a woman - Tortoiseshell and ivory box from Colonial British India (\$1,290) - Ivory and gold elephant pendant (\$175) 	Yes	Enquired about elephant pendant. Seller said "I'm not sure at all, I'm not sure how you tell how old it is." He called his boss who said it was definitely 1940s.
59	[REDACTED]	Piano and antiques	28/4/18	Yes - worked	<ul style="list-style-type: none"> - Piano with ivory keys 1908 (\$8,995) - Indian bowl with ivory stems (\$750) 	Yes	Piano 1908 Bowl India over 100 years old
60	[REDACTED]	Vintage, Antiques and Collectables	29/4/18	No	N/A	N/A	N/A
61	[REDACTED]	Antiques and Collectables	29/4/18	Yes - worked	<ul style="list-style-type: none"> - Casuarina and ivory crucifix (\$475) - Ivory napkin rings (\$145) - Ebony elephants with suspected ivory tusks (not labelled) (\$35-\$65) 	Some	On enquiring about the napkin rings, the seller replied "I have no idea how old they are." Other items not labelled.

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller had no understanding of provenance and had to call his boss who advised that "Anything pre-1942 is OK worldwide. I can write a receipt with a stamp on it and any problems call us."	No	CORRECT The boss was aware of 1940s date (she thought 1942) INCORRECT Seller advised that a receipt and a stamp would be sufficient documentation and to call if any problems but that it was so small it shouldn't be a problem.	Seller advised that a receipt and a stamp would be sufficient documentation and to call if any problems but that it "was so small it shouldn't be a problem."		Yes: – Tiger claw Rajasthan c1860s 'very rare' – c19th whale bone boot hook (\$275)
No documentation (bowl). Didn't enquire about piano. No paperwork	Seller said "its very old not sure how old." She advised to "carry in hand luggage and probably safest to declare it to customs. You'd have to call customs and check as I'm not sure."	No	CORRECT Seller advised to call customs and declare item at customs. INCORRECT Seller didn't offer any provenance documentation, just a letter and a business card.	Seller advised that a letter and a business card would be sufficient provenance documentation.		No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller had "no idea if you can take back to the UK I'll google it." After looking online, she advised "I would just say they are plastic or resin."	No	INCORRECT Seller advised to say ivory napkin rings were "plastic or resin."		Seller had no idea of age or need for provenance documentation.	Yes: – Colonial Whalebone knitting needle (\$345) – Lots of coral

CANBERRA: Key findings from investigation

28 – 29 April 2018

OVERVIEW

- Out of nine shops visited, four sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale observed was a minimum of 11 lots
- Prices ranged from \$40 for a puzzle ball pendant to \$1,800 for a carved ivory puzzle ball on stand
- The overall estimated price of items observed was \$3,881*

ADVICE ON EXPORTING IVORY

- Overall, when asked about the possibility of taking ivory back to the UK, the sellers gave very different recommendations.
- Only one seller provided the fully correct requirements for a buyer wanting to take an item overseas (Ref 62):
 - Stating categorically that, in order to take ivory back to the UK "You would need to get a CITES certificate this end from the Wildlife Department, that usually takes three months and would have to be accompanied by a letter from us saying that, to the best of our knowledge, it's pre-1975."
 - Adding: "Then you would have to get some kind of certificate that end. The dates are different, the UK is 1945 and here is 30 June 1975. The UK made the date earlier so people can't make up bullshit stories and the item speaks for itself."
 - Concluding: "You could just put in your luggage but probably not worth the risk."
- Another seller said "I wouldn't advise taking back to the UK. You would need documentation and I don't have anything to prove its age. It's just one of those things these days with ivory, you can't export or import it. Customs would probably take it off you and burn it." (Ref 64)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.

- Two of the four ivory sellers gave some sort of illegal export advice, among which:
 - One seller told investigator "We think they (rings and pendants) are pre-1973 but it's impossible to prove. Just don't say anything, wear it. And, if asked, just say its plastic, that's the euphemism that the Americans have created for ivory so that they can sell it on eBay etc. Everyone knows what it really means." (Ref 63)
 - One seller offered to provide a letter and receipt stating that the item was antique. He claimed that this would be enough evidence for customs to know that the ivory was not illegally acquired. When questioned whether this would be sufficient he replied, "Yes of course, I'm a registered antiques dealer so it's obviously antique." (Ref 68)

ITEMS ON SALE

Elephant ivory

- Jewellery included rings, brooches and pendants.
- Other items included a puzzle ball statue, a Japanese ivory carved statue, a letter opener and a tatting shuttle.

Other wildlife species found for sale

- Large selection of carved mammoth ivory (Ref 67)
- Bone statues (seller thought Buffalo bone) (Ref 70)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.



10/10W
M/98
IVORY ROSE
PENDANT
STERLING
CITRIN



CANBERRA: Overview of ivory items found in antique stores

3 May 2018

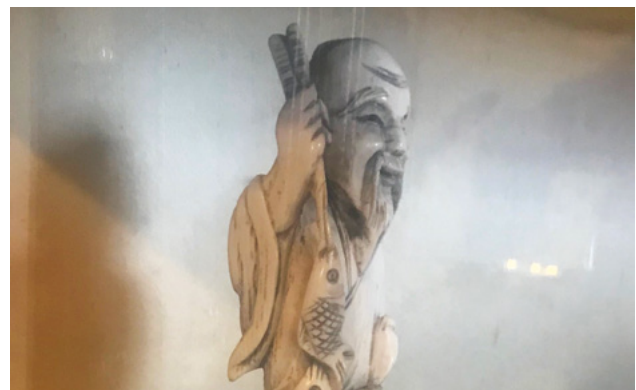
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VISITED 3 MAY 2018
REFERENCE NUMBER 67

The shop had a large array of carved mammoth ivory items. The seller sources the raw fossil mammoth tusks from Siberia & Alaska and sends to Bali for carving. The seller said "I've been doing this for 20 years trying to encourage people that, if they like the look of ivory, to buy mammoth ivory instead. Even Michelle Obama wears it."



████████████████████
VISITED 3 MAY 2018
REFERENCE NUMBER 68

A government-approved antique home business. The seller advised investigator that these items are from around 1900 and would be fine to take back to the UK. He said that he would write a signed letter and that would be sufficient, adding "I'm a registered antique dealer so its obviously antique."



████████████████████
VISITED 3 MAY 2018
REFERENCE NUMBER 62

Various stalls in this antique centre sold ivory. The seller (appraiser) said categorically that it was illegal to take ivory back to the UK: "You would need a CITES certificate this end from the Wildlife Dept - that usually takes three months and would have to be accompanied by a letter from us saying that, to the best of our knowledge, it's pre-1975."



████████████████████
VISITED 3 MAY 2018
REFERENCE NUMBER 64

An ivory letter opener, not clearly labelled but the seller confirmed it was ivory. There was no documentation to prove its age but thought it was 80 or 90 years old. The seller advised investigator not to take the item back to the UK as "customs would probably take it and burn it."



████████████████████
VISITED 3 MAY 2018
REFERENCE NUMBER 63

The seller thought items are pre-1973 but says "it's impossible to prove." The seller advised investigator: "just don't say anything, wear it. If asked, say its plastic, that's the euphemism the Americans have created for ivory so they can sell it on eBay etc. Everyone knows what it really means."



SUMMARY

- Four out of nine antique shops visited sold ivory items.
- Varying levels of export advice given, including two sellers providing illegal advice.
- Only one seller provided correct export advice and need for CITES documentation.
- Not one seller specifically mentioned the need for a Wildlife Statutory Declaration.

CANBERRA: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
62	[REDACTED]	Antiques Centre with lots of vendors, none individually attended. One store manager.	3/4/18	Yes - worked	<ul style="list-style-type: none"> - 1930s or 1940s Indian elephant ivory letter opener (Shop #5 Needlewitch) (\$68) - 1880's tatting shuttle (Shop #5 Needlewitch) (\$95) - Ivory fish brooch (Shop #27 Ellavale Collectables) (\$45) - Ivory rose pendant (Shop #10 Possessions) (\$95) 	Yes	I asked about rose pendant. The owner of the stall wasn't present so I asked one of the managers (he was actually an appraiser). He said he wasn't sure where it was from but most ivory was from Japan or China.
63	[REDACTED]	Antiques, Art and Collectables	3/4/18	Yes - worked	<ul style="list-style-type: none"> - 1950s ivory ring (\$70) - Pre-1973 carved ivory pendant (\$50) - Pacific Islands pre-1973 ivory pendant (\$60) - Pre-1973 ivory puzzle ball pendant (\$40) 	Yes	Seller said "we think they are pre-1973 but it's impossible to prove."
64	[REDACTED]	Antiques and Collectables	3/4/18	Yes - worked	Ivory letter opener (\$58)	No	Seller thought it was 80 or 90 years old.
65	[REDACTED]	Antiques Shop	3/4/18	No	N/A	N/A	N/A
66	[REDACTED]	Oriental Antique Furniture	3/4/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	The seller turned out to be an appraiser, who had a high level of knowledge on provenance and legal requirements. He categorically stated that it was illegal to take ivory back to the UK.	Yes	CORRECT The seller said categorically that it was illegal to take ivory back to the UK. "You would need to get a CITES certificate this end from the Wildlife Dept that usually takes three months and would have to be accompanied by a letter from us saying that, to the best of our knowledge, it's pre-1975. Then you would have to get some kind of certificate that end. The dates are different, the UK is 1945 and here is 30 June 1975. The UK made the date earlier so people can't make up bullshit stories and the item speaks for itself."	He said "You could just put in your luggage but probably not worth the risk."	Appraiser was very knowledgeable. He inspected pendant with a magnifying glass and said that he suspected that it wasn't in fact ivory, but bone. He offered to call the seller and "tell her its bone and she might take \$50 off but I doubt it. "	No
No documentation No paperwork	Seller advised: "We think the items are pre-1973 but it's impossible to prove."	No	INCORRECT Seller advised "Just don't say anything, wear it. And, if asked, just say its plastic, that's the euphemism that the Americans have created for ivory so they can sell it on eBay etc. Everyone knows what it really means."	Seller advised to not say anything and, if asked, say it's plastic.		No
No documentation No paperwork	Seller said "I wouldn't advise taking back to the UK. You would need documentation and I don't have anything to prove it's age. Its just one of those things these days with ivory, you can't export or import it. Customs would probably take it off you and burn it."	No	CORRECT Seller advised that I would need documentation to prove its age and that customs may confiscate it.			Yes: – Bone pendant
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
67	[REDACTED]	Gemstones & Jewellery	3/4/18	No	- An array of carved mammoth ivory items ranging from pendants to large statues (\$100-\$1,000)	Yes - Mammoth ivory	The seller advised that he obtains the raw fossil mammoth tusks from reputable sources in Siberia and Alaska. They are then sent to Bali, for carving.
68	[REDACTED]	Government-licensed home antique business	3/4/18	Yes - worked	- Carved ivory Puzzle ball on stand (\$1,800) - Japanese ivory carved statue (\$1,500)	- Yes - puzzle ball - No - Japanese statue	Seller, when asked how old the puzzle ball was, said "its around 1900, I thought I had labelled it. Its very old and before the cut off date but I can't remember when that is."
69	[REDACTED]	Antique Asian Furniture Shop	3/4/18	No	N/A	N/A	N/A
70	[REDACTED]	Collectables, Antiques and Recycling	3/4/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
Yes documentation Yes paperwork – seller provided a leaflet of authentication, confirming the origin and the differentiation between elephant ivory (Schreger lines)	Seller advised me that the sale of mammoth ivory was completely legal all over the world and that they are 'just fossils'	No	CORRECT Seller advised that I could legally export to the UK.		The seller was very well-informed. When asked if people might think its elephant ivory and it could muddy waters he responded: "It's all about education. We have used and carved mammoth ivory for centuries we are not harming anything. I've been doing this for 20 years trying to encourage people that, if they like the look of ivory, to buy mammoth ivory instead. Even Michelle Obama wears it." He showed me a raw mammoth tusk and pointed out the lines and how they differed to elephant ivory.	Yes: – An array of carved mammoth ivory, items ranged from pendants to large statues.
No documentation No paperwork	Seller looked up a similar puzzle ball in an antiques book to prove its age. He confirmed that it was "definitely antique I'm one of the only genuine antiques dealers left in Canberra." He said that it "would be fine to take back with you I would write you a certificate and you can declare it." When I asked what that certificate was, he replied that it would be a signed letter with his business name on it. When I asked if that would be sufficient he replied "Yes of course, I'm a registered antiques dealer so its obviously antique."	No	CORRECT He did advise that I declare it but didn't offer sufficient provenance documentation. INCORRECT That a signed letter from him would be sufficient authentication.	That a signed letter from him would be sufficient authentication.		No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	Yes: – 6 carved buffalo bone statues on display (\$145)

BRISBANE: Key findings from investigation

4 – 5 May 2018

OVERVIEW

- Out of 19 shops visited, 15 sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale observed was a minimum of 225 lots
- Prices ranged from \$45 for ivory toothpicks to \$7,000 for a large ivory statue
- The overall estimated price of items was \$131,615*

ADVICE GIVEN

- Overall, when asked about the possibility of taking ivory back to the UK, the sellers gave very different recommendations.
- One seller initially advised "you can probably put in your luggage or wear it, but I don't want to give you the wrong advice and you get into trouble." (Ref 73)
 - On further questioning, and after the seller consulted his colleague and they looked up the laws online and informed investigator that "it's a bit of a grey area, the UK is apparently clamping down in the last year and you would need a CITES certificate."
- Another seller said "I wouldn't advise taking back to the UK as I would need proof that its pre-1948. They are definitely older than that, but I don't have proof. They are quite funny about bringing ivory into the country and rightly so, but I've never taken ivory back to the UK so I'm not sure. You would have to declare it at customs." A colleague then interjected to say "There's never anyone at UK customs if you go through Nothing to Declare. You could always say its bone we could write on receipt." To which, she replied "No we wouldn't want to do that." (Ref 89)
- Another seller of a large collection of ivory turned out to be an Oriental Specialist and accredited government valuer. She was well informed about the need for provenance documentation. She advised "Just don't declare it (netsuke). It's too much trouble. Just put in your luggage, it's so small you're just asking for trouble if you declare it." (Ref 85)
 - Not one seller specifically stated the need for Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
 - In some cases, recommendations were given on how to get around export regulations.
 - Twelve out of the 15 sellers gave some sort of illegal export advice, among which:
 - Two sellers advised the investigator if questioned, to claim that the item was "bone". (Refs 79, 89)
 - One seller advised investigator to claim the item was plastic. (Ref 81)
 - Four sellers offered to provide a letter and receipt stating that the item was antique and that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 74, 78, 82, 86)
 - Five sellers advised investigator to hide in luggage. (Refs 73, 74, 76, 83, 85)
 - One seller's items were blatantly mislabelled as "bone", although on questioning, he confirmed that they were in fact ivory. So, although this seller didn't specifically give illegal advice, because the items were mislabelled, anyone buying them to take overseas is being misled. (Ref 84)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.

ITEMS ON SALE

Elephant ivory

- Jewellery included bracelets, bangles, rings, earrings, brooches, necklaces and pendants.
- Other items included a range of carved statues, chess sets, cigarette holders, cutlery, toothpicks, a hat pin, ebony elephants with ivory tusks.
- The investigator also found a wide selection of netsukes, puzzle balls, okimonos, Buddhas and snuff bottles.

Other wildlife items for sale

- Taxidermy turtle \$750 (Ref 80)
- Taxidermy crocodile (Ref 80)
- Range of tortoiseshell items (cutlery, jewellery, card case) \$55 – \$525 (Refs 76, 80)
- Taxidermy snake and mongoose \$195 (Ref 77)
- Walrus tusks raw not priced (Ref 85)
- Walrus ivory netsuke of octopus c18th \$1,192 (Ref 79)
- Range whale teeth carvings (Ref 79)
- Two modern scrimshaws \$350 and \$225 (Ref 78)
- Scrimshaw \$1,445 (Ref 79)

BRISBANE: Overview of ivory items found in antique stores

4 – 5 May 2018

████████████████████
VISITED 5 MAY 2018
REFERENCE NUMBER 74

The seller advised investigator that he had no idea how old the beads were, saying "It's almost impossible to tell with ivory." The seller advised "just put them in the middle of your suitcase, they'll never know. I can write on receipt Victorian or vintage." A colleague advised "Oh, I would just wear them."



████████████████████
VISITED 4 MAY 2018
REFERENCE NUMBER 75

The seller advised investigator that she didn't know whether pendant was bone or ivory and had no idea if it could be taken to UK, advising "just google it."



████████████████████
VISITED 5 MAY 2018
REFERENCE NUMBER 76

On enquiring about the age of an ivory bust, the seller said "I have no idea how old it is it's impossible to tell." The seller suggested to investigator "I would just wrap up in your pyjamas and put in your suitcase."



██████████
VISITED 5 MAY 2018
REFERENCE NUMBER 78

One seller advised "No problem at all taking (bangle) back to the UK. No need for documentation, just leave tag on that's enough." His colleague added "As long as it's over 30 years old it's OK just wear it, no-one is going to ask 'Is that ivory madam?' A third colleague said "No, the UK is 1940's but it's before then so it's fine."



██████████
VISITED 5 MAY 2018
REFERENCE NUMBER 79

The seller advised that the ivory bangle had no documentation and that they "can't prove the age of a lot of this stuff. "You definitely can't take (bangle) back to the UK, as it's the UK that is driving the ban so you would probably get it destroyed. They are pretty much destroying everything so there is no desire for it. You could say it's bone but that's the risk you take."



The seller added "I'm just being honest with you, we probably shouldn't be selling a lot of this stuff as it's post-1947 and basically illegal and we have no proof."

Adding "I try and avoid it if I can I have ivory beads at home and I hide them."



██████████
VISITED 4 MAY 2018
REFERENCE NUMBER 81

The seller advised investigator, when asked about taking a letter opener back to the UK, "Simple, just say it's plastic."



VISITED 5 MAY 2018
REFERENCE NUMBER 82

The seller advised investigator "If you were American I would say no as they've banned all imports...but the UK's no problem at all I'll give you a receipt and you can also get tax back."



VISITED 4 MAY 2018
REFERENCE NUMBER 83

The seller advised investigator "The UK is OK as there is so much of it (ivory) there anyway. It's the Yanks that have a problem they've even banned rosewood.. Just put in your luggage will be fine." The seller added that he tries not to buy ivory anymore as its getting "too difficult."



VISITED 5 MAY 2018
REFERENCE NUMBER 82

A pawnbroker in Fortitude Valley, with lots of ivory items for sale but mislabelled as 'bone'. The owner confirmed that it was in fact ivory.

When asked why they were marked as bone, he replied "I think it's just easier."



VISITED 5 MAY 2018
REFERENCE NUMBER 85

Lots of ivory items for sale, including large selection of netsukes. The seller advised "Just don't declare it too much trouble just put in your luggage it's so small you're just asking for trouble if you declare it." The seller is an Oriental Specialist and accredited government valuer.



████████████████████
VISITED 4 MAY 2018
REFERENCE NUMBER 86

The seller admitted to investigator "I don't know, you would need some kind of proof from me saying how old I think it is and would probably be OK. I've taken ivory back to the UK they're a bit funny about imports in last six months ...they just want to be sure you're not trafficking new ivory, but it's antique so they don't worry about that. It's also VAT exempt if it's antique."



████████████████████
VISITED 4 MAY 2018
REFERENCE NUMBER 87

The seller advised investigator "Oh absolutely fine to take it (bracelet) with you to the UK you just can't take it to the US." The seller advised the bracelet came with a valuation certificate but the certificate wasn't displayed.



████████████████████
VISITED 5 MAY 2018
REFERENCE NUMBER 72

The seller had a very different response from that of it's sister store. He said categorically "No you can't take back to the UK. It's fine for us to sell it but you can't transport across borders." I've heard of people getting teapots with small ivory bands getting confiscated. We don't buy ivory anymore for that reason."



████████████████████
VISITED 5 MAY 2018
REFERENCE NUMBER 73

Lots of ivory on sale including statues and jewellery. The seller said "I'm not sure about the UK but you definitely can't take to the US or China, they will destroy it. You can probably put in your luggage or wear it...that's what I'd do." The seller then looked online and informed investigator that a CITES certificate is required for the UK.



VISITED 4 MAY 2018
REFERENCE NUMBER 89

The seller said "I wouldn't advise taking back to the UK as you would need proof that its pre-1948 and I don't have proof. You would have to declare it at customs." Second seller suggested "We could always say its bone we could write on receipt." The original seller said "No we wouldn't want to do that."



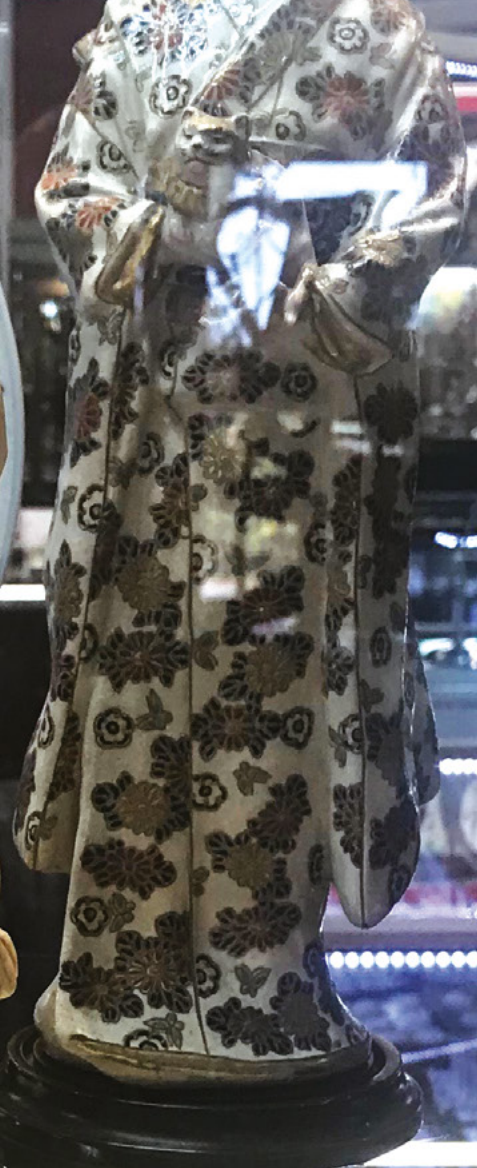
SUMMARY

- Fifteen out of 19 shops visited, sold items made of elephant ivory.
- Twelve out of the 15 ivory sellers gave some sort of illegal export advice:
 - Two dealers advised the investigator to claim that the item was 'bone', one to claim the item was plastic.
 - Five sellers advised investigator to hide in luggage.
 - One seller's items were blatantly mislabelled as 'bone', although in fact ivory.
- Not one seller specifically mentioned need for a Wildlife Statutory Declaration.



Description: Chinese Yongzheng Period porcelain plate; famille rose; perfect condition; circa 18th century

Price: \$1000



Description: Japanese ivory netsuke of a figure in a kimono; signed Shosha; circa 18th century

Price: \$4150



Description: Japanese Satsuma vase by Kinkozan; fine quality millefleur decoration; signed; circa 1900

Price: \$1032

Stock No.: 5



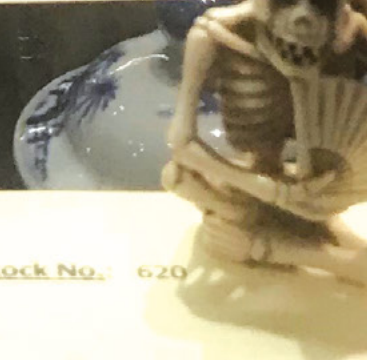
Description: Japanese marine ivory (walrus) netsuke of Ashinaga and Tenaga with an octopus; circa 18th century

Price: \$1192



Description: Japanese marine ivory netsuke of a seated Fukurokuju alongside a table with peaches; signed; circa Edo Period (1850s)

Price: \$1376



Stock No.: 620

BRISBANE: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
71	[REDACTED]	Antiques and Auctions	5/5/18	No	N/A	N/A	N/A
72	[REDACTED]	Antiques	5/5/18	Yes - worked	<ul style="list-style-type: none"> - Large ivory statue (\$7,000) - Ivory carved dish (\$5,000) - 3 ivory necklaces - Selection of ivory rings - 5 ivory bangles - 2 pairs of ivory earrings - 2 ivory brooches (\$1,200 and ?) 	Yes	When asked how old the jewellery was, seller replied "I'm not sure how old a lot of this is it's so hard to tell."
73	[REDACTED]	Antiques	5/5/18	Yes - worked	<p>Lots of ivory jewellery and ornaments including:</p> <ul style="list-style-type: none"> - 7 ivory necklaces (\$680) - Approx. 20 ivory bangles (\$340 and \$375) - Ivory and jade bangle (\$1,200) - 2 ivory pendants - 3-4 ivory rings - A few pairs of ivory earrings - 2-3 brooches - Ivory frog keyring (\$250) - 2 letter openers - 3 carved statues - The drunken poet' Chinese ivory carving (c19th) - Chinese ivory puzzle ball on stand c1900 - Carved dragon on stand (\$850) - Carved ivory tray - Ming Dynasty carved ivory figure (\$3,750) - Two carved ivory figures on timber (\$1,500) - Male Buddhist lion on lotus throne carved of ivory (\$2,800) 	Yes	<p>On enquiry about the ivory jewellery, seller said most of it was 'very old'. A couple of the bracelets were 1950 or 1970 though.</p> <p>Seller said that most of ivory was sourced from the US.</p>

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller had a very different response from that of it's sister store. He said categorically: "No you can't take back to the UK. It's fine for us to sell it but you can't transport across borders. "I've heard of people getting teapots with small ivory bands getting confiscated. We don't buy ivory anymore for that reason."	No	INCORRECT Seller advised that it was totally illegal to transport across borders, didn't mention any requirement for provenance documentation.		Note: Lighting made it very hard to take photographs in this store	No
No documentation No paperwork	Seller didn't know about UK laws. He said "I know that you can't take to the US or China, definitely not, they will destroy it."	Yes	CORRECT When looking up laws online, seller advised that I would need a CITES certificate.	Seller suggested that I could put in luggage or wear it (as he would probably do), but that he wouldn't want to take responsibility for giving me wrong advice if I get into trouble.	On further questioning, the seller consulted his colleague and they googled the laws and informed me that "its a bit of a grey area, the UK is apparently clamping down in the last year and you would need a CITES certificate." I asked whether it was my responsibility to obtain the CITES certificate or his, he replied "ooh I think we would have to get it but it would take too long so overall, it's maybe not worth the risk of buying it. Which is a real shame I mean it's not as if we are going out killing elephants." Seller said that "ivory is very controversial so we try to hide it away a bit and not put it on central display which is a shame as it's so beautiful. I wear it."	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
74	[REDACTED]	Antique Centre	5/5/18	Yes - worked	<ul style="list-style-type: none"> - Ivory letter opener (\$350) - 2 ivory pill boxes (\$195 each) - 3 ebony elephants with ivory tusks - 1 ebony and ivory elephant arch (\$225) - Long vintage ivory beads (\$895) 	Yes	<p>Seller had ""no idea"" how old the vintage beads were, saying ""its impossible to tell with ivory, probably 1930s or 1940s based on their length.""</p> <p>He wasn't sure of their origin as they were on a Sydney dealer's stall."</p>
75	[REDACTED]	Antique Centre	4/5/18	Yes - worked	<ul style="list-style-type: none"> - Vintage ivory oriental boat (\$475) - Antique oriental ivory buddhas (set of 6) (\$300) - Vintage African ivory elephant stools (\$125 each) - Ivory or bone heart pendant \$395) 	Yes but pendant labelled 'bone or ivory.'	Pendant was from France, seller not sure how old it is but marked 'very old'
76	[REDACTED]	Antiques	5/5/18	Yes - worked	<ul style="list-style-type: none"> - Ivory bust (\$225) - Ivory handled berry spoon (\$95) - Ivory cigarette holder (\$145) 	Yes	On enquiring about age of ivory bust, seller said "I have no idea how old it is it's impossible to tell."
77	[REDACTED]	Antiques and Collectables	5/5/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised that he had no idea how old they were.	No	INCORRECT Seller advised to "just put them in the middle of your suitcase, they'll never know."	Seller advised to not declare it and "just put them in middle of suitcase. I can write on receipt Victorian or vintage." His colleague advised "Oh just wear it."	The centre had individual, independent stalls, with a store manager. The necklace was on a Sydney dealer's stall. The store manager said "There are stupid rules with ivory you're not allowed to export it. But it's hardly as if you're carrying 30kg and going to carve it into something!"	No
No documentation No paperwork	Spoke to shop manager as stalls in centre were unattended. She said she didn't know whether pendant was bone or ivory and had no idea if it could be taken to UK, advising "just google it."	No			Individual stalls in antique centre weren't attended by sellers so I just spoke to the store manager who had no idea of provenance or export law.	No
No documentation No paperwork	Seller suggested "I would just wrap up in your pyjamas and put in your suitcase." When I asked if I needed any proof he replied "Not as far as I know."	No	INCORRECT Seller suggested "I would just wrap up in your pyjamas and put in your suitcase." When I asked if I needed any proof he replied "Not as far as I know."	Seller advised to hide in luggage and that there was no need for documentation.		Yes: – Tortoiseshell card case (\$525)
N/A	N/A	N/A	N/A	N/A	N/A	Yes: – Taxidermy snake and mongoose (\$195)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
78	[REDACTED]	Antiques Centre	5/5/18	Yes - worked	<p>A large selection of ivory ornaments and jewellery including:</p> <ul style="list-style-type: none"> - African ivory chess set and board 18 or 1950s \$1,285) - Ivory ring - Ivory carved elephant (\$145) - 3 Japanese netsukes (\$495 each) - Carved ivory happy Buddha sitting (\$595) - Carved ivory happy Buddha standing - Vintage carved ivory wagon c1920 (\$4,500) - Ebony and ivory dominoes (\$75) - Carved ivory tiger early c20th (\$120) - Ivory beads c1910 (\$325) - Ivory salt and pepper pots c1920 (\$125) - Second pair of salt and pepper pots (\$200?) - Japanese netsuke (\$400) - Carved ivory pendant - Ivory and silver bangle c1930 (\$450) - Indian ivory perfume bottle (\$395) - 2 carved ivory Chinese figurines (\$325) - Chinese ivory Mandarin and wife on puzzle balls c1900 (\$1,200) - Signed Chinese puzzle ball c1900 (\$850) - Ivory Chinese figure of a drunken man (\$170) - Japanese ivory figure c 1900 (\$400) - 2 ivory bead necklaces c1920 (\$295 and ?) - Japanese carved ivory trinket box (\$450) - Carved elephant seal c20th (\$170) - Japanese carved ivory pendant 18ct gold c1900 (\$395) - Ivory and gold bangle 1900s (\$450) - Chinese carved ivory shoe horn c1890 (\$595) - Set of 8 carved ivory horses c1930 (\$2,000) - Small carved ivory camel - Ivory buttons 1900 (\$450) 	Yes	Noted on description of item where marked

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	There were three sellers and my question about taking an ivory item back to the UK started a team discussion - with differing advice, ranging from it being no problem, to the item having to over 30 years old. With an final comment confirming pre-1940s.	No	<p>CORRECT Third seller gave the correct 1940s date for the UK</p> <p>INCORRECT All the sellers agreed that it would be fine to just wear it and that a receipt and leaving that tag on would be sufficient.</p>	All the sellers agreed that it would be fine to just wear it and that a receipt and leaving that tag on would be sufficient.	Most of the ivory items for sale in this centre were from Lynzay Antiques http://www.lynzayantiques.com	Yes: – 2 modern scrimshaws (\$350 and \$225)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
79	[REDACTED]	Antiques Centre	5/5/18	Yes - worked	<ul style="list-style-type: none"> - Japanese ivory cherry branch netsuke c19th (\$784) - Japanese ivory warrior netsuke c1900 (\$920) - Japanese ivory okimono of a fan maker c1900 (\$1,880) - Japanese ivory page turner (late c19th) (\$1,832) - Ivory elephant (\$1,280) - Ivory stamp (\$1,184) - Chinese ivory bottle (\$552) - Netsuke of man standing c1900 (\$1,080) - Netsuke of man chasing fox priest 19th C (\$1,080) - Ivory figure of man playing lire on wooden tablet (\$1/2160?) - Japanese early netsuke of Sennin early c18th (\$1,112) - Various other okimono and netsukes (\$504) (dragon fish netsuke) - Bronze elephant with ivory tusks c1900 (\$1,800) - Large bronze elephant ivory tusks signed Mitsumoto c1890s (\$6,760) - Japanese ivory netsuke street dancers c19th (\$1,160) - Japanese ivory netsuke chicks in nest c1900 (\$1,032) - Japanese ivory okimono family Shosu signed c1880s (\$3,912) - Japanese ivory okimono wood worker c1900 (\$1,432) - Japanese ivory okimono fisherman (\$1,576) - Japanese ivory netsuke horse c1920s - Chinese miniature ivory dog of Foo seal c18th (\$4,184) - Japanese ivory netsuke horse late c18th - Rare Japanese ivory Rantei netsuke (\$2,152) - Ivory daily diary c19th (\$392) - Chinese ivory sewing threads c1930s (\$232) - Japanese ivory netsuke monkey late c18th/ early c19th (\$792) - Japanese ivory netsuke of a sparrow c19th (\$1,384) - Chinese ivory Foo dog toggle c18th (\$792) - Chinese ivory toggle of lotus late c18th (\$792) - Japanese ivory netsuke of a rat late c18th (\$1,176) - Japanese okimono/netsuke of group under tree c1900 (\$792) - Chinese ivory seal block c19th (\$1,192) - Chinese ivory figure of a sage c19th (\$4,632) - Japanese ivory netsuke of a priest c1930s (\$584) - Japanese ivory netsuke of a crab catcher c19th (\$2,320) - Japanese okimono of a peasant c19th (\$2932) - Carved Japanese fisherman figure (date?) - Chinese ivory snuff bottle early c19th (\$952) - Ivory magnifying glass - Buddha netsuke mid c19th (\$1,850) - Okimono Meiji period (\$1,900) - 3 okimono/netsukes - Ivory four monkeys (\$220) - Ivory and silver bangle 1930s (\$250) - Ivory earrings 1930s (\$85) - Ivory twist necklace (\$75) - 2 ivory bead necklaces - Ivory pendant on gold chain (\$295) 	Yes	<p>Most of the netsukes were c18th and c19th Japan and China</p> <p>Jewellery 1900s</p>

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation (bangle) No paperwork	Seller advised that the bangle had no documentation and that they "can't prove the age of a lot of this stuff". She said "I'm just being honest with you, we probably shouldn't be selling a lot of this stuff as it's post 1947 and basically illegal and we have no proof."	No	CORRECT Seller advised I couldn't take back to the UK as there is no provenance documentation and its likely post 1947. Seller didn't want to recommend that I buy it.	Seller did suggest that "you could just say its bone but that's the risk you take."	It was an antique market with lots of individual stalls and I spoke to the store manager. She admitted to me that a lot of it was "probably illegal." She was very aware of the debate and controversy around ivory sales and admitted that she doesn't wear ivory anymore herself and that she had an ivory necklace at home which she "hides in her bottom drawer and never wears as she doesn't feel comfortable wearing it. She said there was "a lot of debate on the Antiques Roadshow and at the Museum about the ban and whether they should destroy 17th Century stuff."	Yes: – A selection of Marine ivory netsukes including: – Walrus ivory netsuke of octopus c18th (\$1,192) – Marine ivory netsuke of seated Fukorokuju with peaches c1850s (\$1,376) – Japanese marine ivory (whale tooth) rat netsuke c19th (\$1,192) – Japanese marine ivory netsuke of a goose (\$1,032)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
80	[REDACTED]	Antiques	4/5/18	No	N/A	N/A	N/A
81	[REDACTED]	Antiques	4/5/18	Yes - worked	<ul style="list-style-type: none"> - Some ivory carvings (\$950 one carving) - A fan - A letter opener 	Some	
82	[REDACTED]	Antique Jewellery	5/5/18	Yes - worked	<ul style="list-style-type: none"> - 2 pairs of ivory earrings - Ivory bead necklace (\$1,995) - Ivory bangles (\$995) 	Yes	Seller advised they were Victorian
83	[REDACTED]	Antiques	4/5/18	Yes - worked	- 10 ebony elephants, some with ivory tusks intact (\$260)	Yes	Seller advised elephants were probably from Ceylon but wasn't sure of their exact age
84	[REDACTED]	Pawnbrokers	5/5/18	Yes - worked	<ul style="list-style-type: none"> - 7 ivory bangles (\$325, \$625, \$265, \$425, \$625, \$785) - Pair of dragons (\$3,250) - Various carved statues (labels not visible) 	No	Not clear

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
N/A	N/A	N/A	N/A	N/A	N/A	Yes: – Taxidermy turtle (\$750) – Taxidermy crocodile unpriced – Range of tortoiseshell items (cutlery and jewellery) (\$55-\$395)
No documentation No paperwork		No	INCORRECT Seller advised to "just say its plastic."	Seller advised to "just say its plastic."	Seller was very offhand and wanted to close up his shop early, so I didn't have time to take many photos or ask questions.	No
No documentation No paperwork	On asking their age the seller said "they are Victorian I know how old they are I've been going 40 years." In reply to me asking if I could take back to the UK, she said "If you were American I would say no as they've banned all imports. But the UK no problem at all I'll give you a receipt and you can also get tax back."	No	INCORRECT Seller advised that there was no problem exporting to UK and no need for any additional documentation other than a receipt with age on it.	Seller advised that there was no problem exporting to UK and no need for any additional documentation other than a receipt with age on it.	Seller cited an American lady that had wanted to buy the jewellery and take back to the US and she told her she couldn't and she was "so disappointed."	No
No documentation No paperwork	Seller advised that "They have age to them so OK. The UK is OK as there is so much of it there anyway. It's the Yanks that have a problem they've even banned rosewood."	No	INCORRECT Seller advised to "just put in luggage."	Seller advised to "just put in luggage." No documentation offered.	Seller added that he tries not to buy ivory anymore as its getting "too difficult."	No
No documentation No paperwork	When I asked about export seller replied "They are definitely legal to sell as they are pretty old but I'm not sure about taking across borders I wouldn't want to give you wrong legal advice."	No	CORRECT Seller checked with boss who confirmed they were ivory. But he wasn't sure how old they were or what the export laws were so didn't want to give me incorrect legal advice. INCORRECT Items were mis-labelled 'bone'. Only after questioning did seller confirm they were in fact ivory.	Items were mislabelled 'bone'. Only after questioning did seller confirm they were in fact ivory. Anyone buying them is being misled and could therefore inadvertently act illegally if they tried to export them.		Yes: – Scrimshaw (\$1,145)

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
85	[REDACTED]	Antique Dealer and Valuations	5/5/18	Yes - worked	<p>Lots of ivory items including:</p> <ul style="list-style-type: none"> - Selection (4-5) of ivory statues - Carved ivory dragon and flower arc (\$1,250) - Selection of netsukes (around 16) (\$85, \$245, \$295, \$395, \$395 - \$980) - Carved arc shaped ivory tusk with reticulated carving of scenes (\$2,450) - Second ivory ark tusk shape - Ivory chess set with carved Egyptian pieces (\$980) - Ivory chess set with carved oriental pieces (\$125) - 2 ivory embroidery awls - Ivory cigarette holder (\$175) - 3 ivory tooth picks (\$45) - Ivory chess pieces 	Yes	Enquiring about netsukes, the seller said one was mid-century (\$295) the other was 'very old' (Japanese \$980)
86	[REDACTED]	Antiques	4/5/18	Yes - worked	- Ivory hat pin (\$125)	Yes	Seller advised it was from 1900s, wasn't sure where its from, probably UK.
87	[REDACTED]	Antiques	4/5/18	Yes - worked	<ul style="list-style-type: none"> - Ivory needle case (\$75) - Ebony and ivory elephant (\$55) - Ivory bangle 1930 (\$1500) 	Yes	The bangle the seller advised was from France and had "a fair bit of age to it, probably around 1850 or 1900" (although label said 1930)
88	[REDACTED]	Antiques	5/5/18	No	N/A	N/A	N/A
89	[REDACTED]	Antiques	4/5/18	Yes - worked	-2 ivory puzzle ball statues - one small and one larger (\$450 and \$950)	Yes	Seller advised it was from 1900s, not sure where its from.

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised "Just don't declare it too much trouble just put in your luggage its so small you're just asking for trouble if you declare it."	No	INCORRECT Seller advised categorically to not declare it and just put in luggage, not worth the trouble to declare such a small item. She said that she could put age on receipt but too much trouble to declare.	Seller advised to not declare item and to hide in luggage.	The seller was obviously very knowledgeable about ivory and the need for provenance documentation, but still gave illegal advice. With further investigation she was an oriental specialist and government accredited valuer.	Yes: – Walrus tusks
No documentation No paperwork	Seller admitted "I don't know, you would need some kind of proof from me saying how old I think it is and it would probably be OK."	No	CORRECT Seller advised that I would need some provenance documentation, but didn't know exactly what that entailed. INCORRECT Seller advised that a note from him saying how old he thinks the item is would probably be sufficient provenance documentation.	Seller advised that a note from him saying how old he thinks the item is would probably be sufficient provenance documentation.		No
Seller didn't present valuation documentation as she didn't have to hand.	Seller said it came with documentation but when I asked to clarify what that was, she said it was a valuation so I'm not sure if this constituted provenance documentation. "	No	INCORRECT Seller advised that it would be absolutely fine to take it back to the UK	Seller advised absolutely fine to take it back to the UK and there was no need for any documentation.	Seller did mention certification but, on further discussion, it was clear this was a valuation and she didn't have to hand, so I'm not sure whether this constituted provenance documentation.	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller said that she "wouldn't advise taking back to the UK as you would need proof that its pre-1948. They are definitely older than that but I don't have proof. You would have to declare it at customs."	No	CORRECT Seller advised that I would have to declare it and would need some provenance documentation.		Colleague interjected to say "There's never anyone at UK customs if you go through Nothing to Declare. You could always say its bone we could write on receipt."	No

AAADA ANTIQUES FAIR MELBOURNE 3 - 6 MAY 2018: Key findings from investigation

6 May 2018

OVERVIEW

- Out of 31 stalls visited, 15 sold elephant ivory
- All items found were made of worked ivory
- The number of items for sale observed was a minimum of 119 lots
- Prices ranged from \$85 for ivory counters to \$17,500 for a pair of ivory ladles
- The overall estimated price of items was \$143,752*

ADVICE GIVEN

As the circumstances of this situation differed to the rest of the investigation (all of the sellers being in very close proximity), in order to remain covert, it was only possible for the investigator to talk to eight out of the 15 ivory sellers.

- Overall, when asked about the possibility to take the ivory to the UK, the sellers gave very different recommendations.
- Not one seller provided the absolute correct requirements for a buyer wanting to take an item overseas. Two sellers advised the investigator that ivory was a 'prohibited item' and that it couldn't be exported or imported. (Refs 106, 113)
- Two sellers mentioned the need for a certificate, but not a CITES certificate, a CENAS (sic) certificate. (Refs 100, 108)
- Not one seller specifically stated the need for the Federal Department of the Environment and Energy's, Wildlife Statutory Declaration.
- In some cases, recommendations were given on how to get around export regulations.
- Seven out of the eight sellers, gave some sort of illegal export advice, among which:
 - Two sellers advised the investigator if questioned, to claim that the item was "bone". (Refs 108, 116)
 - One seller initially advised investigator to post the item and write bone on the package and that she would write bone on the receipt. (Ref 108)
 - Two sellers offered to provide a letter and receipt stating that the item was antique and that this would be enough evidence for customs to know that the ivory was not illegally acquired. (Refs 92, 93)
 - Two sellers advised investigator to hide in luggage. (Refs 107, 108)
 - One advised investigator to wear the item. (Ref 112)

* This is a very conservative estimate as the price of many of the items wasn't visible or marked.

ITEMS ON SALE

Elephant ivory

- Jewellery included bracelets, bangles, earrings, brooches, necklaces and pendants.
- Other items included a large range of Japanese netsukes and okimonos, a large selection of ivory tools and instruments, a pair of carved tusks, ivory ladles, chess sets, statues, candlesticks, parasol handles, ivory inlaid boxes, notebooks, page turners, a crucifix and snuff boxes.

Other wildlife items for sale

- Tiger claw necklace India c1840 \$8,000 (Ref 102)
- Trophy necklace Red Deer eye teeth Bavaria c1870 \$2,500 (Ref 102)
- Five convict whale bone spoons TAS c1880 \$1,750 (Ref 102)
- Hippo tusk photo frame English c1900 \$1,750 (Ref 102)
- Killer whale teeth c1866 \$6,500 (Ref 102)
- Pair of sperm whale teeth 1950 \$1,150 (Ref 99)
- Otter penis bone \$285 (Ref 99)
- Tortoiseshell items (Ref 116)
- Walrus ivory seam 1820, whale bone seam 1779 and sailors fids (Ref 101)

AAADA ANTIQUES FAIR: Overview of ivory items found in antique stores

6 May 2018

██████████
VISITED 6 MAY 2018
REFERENCE NUMBER 90

A few ivory items for sale including netsukes, a letter opener and a crucifix. Investigator didn't talk to the seller



██████████
VISITED 6 MAY 2018
REFERENCE NUMBER 92

The seller simply told investigator "I don't think you'll have a problem taking back to the UK, it's antique.

A receipt from me will be OK."



██████████
VISITED 6 MAY 2018
REFERENCE NUMBER 94

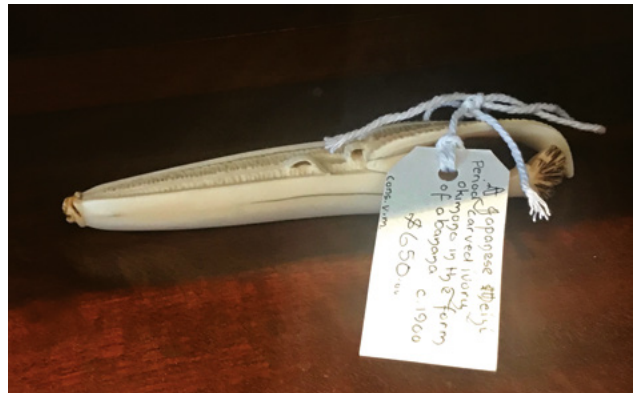
'Vintage carved ivory earrings' \$1,690.

Investigator didn't talk to seller.



████████████████████
VISITED 6 MAY 2018
REFERENCE NUMBER 93

The seller told investigator that she would need to declare the item but that a receipt would be sufficient documentation saying "I can write 10 years older on receipt if you like."



████████████████████
VISITED 6 MAY 2018
REFERENCE NUMBER 99

Items included a pair of 1900 ivory candlesticks \$1,600 and a pair of sperm whale teeth 1950 \$1,150. Investigator didn't talk to seller.



████████████████████
VISITED 6 MAY 2018
REFERENCE NUMBER 100

He advised to check UK rules and that investigator may need a "a CENA (sic) Certificate...it's an antique dealers' thing" adding "It's too much trouble to go to really." He said he sold \$4k worth of ivory to a Chinese person last week and that "if he gets caught taking it into China its six years in prison."



████████████████████
VISITED 6 MAY 2018
REFERENCE NUMBER 101

A wide range of ivory tools and instruments. All dated c18th - c19th but not priced. Investigator didn't talk to seller.



VISITED 6 MAY 2018
REFERENCE NUMBER 102

Investigator didn't talk to seller. A pair of ivory ladles c1790 priced at \$17,500, the most expensive item found. Other wildlife products for sale, included a hippo tusk photo frame, a tiger claw necklace and 1866 killer whale teeth priced at \$6,500.



VISITED 6 MAY 2018
REFERENCE NUMBER 106

Ivory items included a pair of ivory carved tusks pre 1940 African origin \$350 and \$495. Silver and ivory paper knife Birmingham c1905 priced at \$395. Hand carved Chinese 1900 vase priced at \$125.

Investigator didn't talk to seller.



VISITED 6 MAY 2018
REFERENCE NUMBER 105

Investigator didn't talk to seller. When she visited their new store in Hobart none of this ivory was on display.



VISITED 6 MAY 2018
REFERENCE NUMBER 108

One seller advised investigator "There are issues with ivory, that's why they are cheap. Just post them and say they are 'bone' on the package. I can write bone on receipt. It's fine before 1950." A second seller came back to investigator later, having looked up the laws on ivory to advise a 'CERAS' (sic) Certificate but this couldn't be organised at short notice, admitting "I need to do a bit of research around this actually."



VISITED 6 MAY 2018
REFERENCE NUMBER 107

The seller advised investigator "There are big rules around ivory now. I would just wrap them (netsukes) in a bundle in your luggage and don't say anything."



VISITED 6 MAY 2018
REFERENCE NUMBER 110

A substantial selection of ivory items. Investigator didn't talk to seller.



VISITED 6 MAY 2018
REFERENCE NUMBER 112

The seller advised investigator that the beads were "pre-1947 so OK, I can write on receipt, no need for anything else, just wear them that's what I do."



VISITED 6 MAY 2018
REFERENCE NUMBER 113

The seller advised investigator "You can't take it back with you it's a prohibited item." He suggested that the investigator say the item is plastic or bone if asked. "I wouldn't personally risk it as I could lose my licence but as an individual for personal use you could."



VISITED 6 MAY 2018
REFERENCE NUMBER 116

The seller advised investigator "Just don't say anything. Say it's bone we could write it up for you."



VISITED 6 MAY 2018
REFERENCE NUMBER 117

The seller advised investigator "You aren't allowed to bring ivory in or out of the country, you can only buy and sell here." I know they are clamping down because of killing elephants but its not as if items like this have an impact."



VISITED 6 MAY 2018
REFERENCE NUMBER 119

Ivory items included a 19th century snuff box, a Roccoco ivory figure c1740 and two okimono Japanese fisherman 1880 (\$5,500). Investigator didn't talk to seller.



SUMMARY

- Fifteen out of 31 sellers visited, sold items made of elephant ivory.
- Seven out of the eight retailers spoken to gave some sort of illegal export advice:
 - Two antique dealers advised the investigator to claim that the item was bone.
 - Two sellers offered to provide a letter or receipt stating that the item was antique and that this would be enough evidence for customs to know that the ivory was legal.
 - Two sellers advised investigator to hide in luggage, one to wear the item.
- Not one seller mentioned CITES or the need for a Wildlife Statutory Declaration.



Ivory

Vintage well
carved ivory
kangaroo, with
Joey in pouch

#17449

\$825

AAADA ANTIQUES FAIR: Detailed table of findings

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
90	[REDACTED]	Antiques	6/5/18	Yes - worked	<ul style="list-style-type: none"> - Late c17th Spanish carved ivory crucifix c1690 (\$5,950) - Japanese Meiji period ivory immortal figure c1880 (\$695) - Japanese Meiji period signed cabbage netsuke c1890 (\$295) - Japanese Meiji period signed rat netsuke c1910 (\$495) - Japanese Meiji period signed ivory boar netsuke c1910 (\$395) - Indian carved ivory elephant letter opener c1910 (\$795) 	Yes	Dates and origin marked in description of item if labelled.
91	[REDACTED]	Antiques	6/5/18	No	N/A	N/A	N/A
92	[REDACTED]		6/5/18	Yes - worked	Carved ivory rose pendant c1930s (\$3,500)	Not on stall but in brochure yes	1930s
93	[REDACTED]		6/5/18	Yes - worked	<p>Large collection of ivory including: Selection of approx 20 netsukes and 5 large okimono/ statues, including:</p> <ul style="list-style-type: none"> - Netsuke man with fan c1930 (\$495) - Banana netsuke c1900 (\$650) - Netsuke man with fish c1910 (\$1,450) - Netsuke shamen c1940 (\$660) - Rare figural netsuke c19th C (\$3,000) - Japanese lady and flower okimono c1930 (\$2,950) - Carved statue of lady on lotus flower (\$77,00) - Buddha (\$560) - Ivory okimono lady (\$3,800) - Netsuke wild boar 1960 (\$440) - Netsuke two children c1900 (\$2,000) - Netsuke shoki w large hat (\$2,200) - Bimiko (\$850) - Portugese warrior 1950 (\$565) - Dragon netsuke 1940 (\$440) - Dragon netsuke 1960 (\$475) - Demon netsuke signed 1920 (\$900) - Indian ivory carving 1940 (\$560) - Indian Vishnu Indian Ganesh c1860 (\$895) <p>Other items included:</p> <ul style="list-style-type: none"> - Ivory chess set African origin c1950 (\$680) - Ivory carved statue c1950 (\$440) - Ivory and bone mystery ball 1950 (\$990) - Ivory figure c1920 (\$440) - Ivory card case c1920 (\$780) - Japanese ivory brush pot c1880 (\$2,950) - Carved box (\$695) - Fan (\$440) 	Yes	<p>Dates and origin marked in description of item if labelled.</p> <p>Some items marked 1960.</p>

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
Didn't talk	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller simply said "I don't think you'll have a problem, it's antique. A receipt from me will be OK."	No	INCORRECT Seller advised that a receipt would be sufficient documentation.	Seller advised that a receipt would be sufficient documentation.	Seller was very off hand and matter of fact, as if she had never really thought about it.	No
No documentation No paperwork	Seller said "you would have to check what your country's rules are. You would need to declare it. I can write 10 years older on receipt if you like."	No	CORRECT Seller advised that I would need to declare it and to check UK rules. INCORRECT Seller advised that a receipt would be sufficient documentation.	Seller advised that a receipt would be sufficient documentation and offered to write that it was ten years older than it was as that was the margin for estimates.	Large selection of ivory on sale online, some items dated c1960 http://vintagebazaar.com.au/search-results/keyword/ivory+/search-in/product/cat-in/all/search-other/product	No

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
94	[REDACTED]		6/5/18	Yes - worked	Vintage carved ivory and coral earrings (\$1,690)	Yes	No date just 'vintage'
95	[REDACTED]		6/5/18	No	N/A	N/A	N/A
96	[REDACTED]		6/5/18	No	N/A	N/A	N/A
97	[REDACTED]		6/5/18	No	N/A	N/A	N/A
98	[REDACTED]		6/5/18	No	N/A	N/A	N/A
99	[REDACTED]		6/5/18	Yes - worked	Pair of African ivory, blackwood and bronze candlesticks c1900 (\$1,600)	Yes	Africa c1900
100	[REDACTED]		6/5/18	Yes - worked	<ul style="list-style-type: none"> - Ivory bead necklace 1920 (\$895) - Ivory bead necklace 1930 - Antique ivory magnifying glass 1890 (\$495) - Ivory stysil? 1920 - Ivory elephant Japanese 1890 (\$1,090) - c19th ivory 1840 statue (\$2,400) - Ivory carved card case Indian 1920 	Yes	Dates and origin marked in description of item if labelled.

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
Didn't talk	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
Didn't talk	N/A	N/A	N/A	N/A	N/A	Yes: – Pair of sperm whale teeth 1950 (\$1,150) Otter penis bone (\$285)
No documentation No paperwork	Seller advised that there are two dates: 1956 and 1975 but that he "tries to go with older one." He advised to check UK rules and that I "would probably be better off buying it there." He said I would "probably need a CENA (sic) Certificate". When asked what that was, he replied "Oh it's an antique dealers' thing" adding "It's too much trouble to go to really." He said he sold \$4k worth of ivory to a Chinese person last week and that "if he gets caught taking it into China its six years in prison."	No but he referred to another acronym (CENAS (sic)).	CORRECT Seller knew that there was a need for some kind of provenance documentation, he just wasn't sure of the exact details. INCORRECT Seller got the older date incorrect, stating 1956 instead of 1947		Seller was relatively well-informed about the need for provenance documentation and that there were legal implications involved in export. He was aware of the China rules but not the specific UK rules. Perhaps seller meant this organisation https://www.cinoa.org/cinoa/aboutus	No

Trade in elephant ivory and rhino horn
Submission 65 - Attachment 2

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
101	[REDACTED]		6/5/18	Yes - worked	Selection of 20-25 ivory tools including: - Proof rule 1865-1911 London - 2 ivory four fold rules Chipping Norton - Cattle gauge - Parall rule 1817-1836 - Boxwood rule 1859 - Wire and ivory gauge	Yes	N/A
102	[REDACTED]		6/5/18	Yes - worked	- Unknown instrument ivory and gold England c1770 (\$16,000) - Unknown ivory (suspected) instrument (no label) - Ivory handled carving fork English c1820 (\$1,600) - Collection of pipe stoppers, many ivory (\$15,000) - Anglo-Indian ivory ladles c1790 (\$17,500)	Yes	N/A
103	[REDACTED]		6/5/18	No	N/A	N/A	N/A
104	[REDACTED]		6/5/18	No	N/A	N/A	N/A
105	[REDACTED]		6/5/18	Yes - worked	- Carved ivory statue c1900 (\$1,495) - Carved ivory easel watch stand c1870 (\$495) - Art deco period ivory candlestick c1920 (\$985) - Carved ivory Chinese page cutter c1870 (\$795) - Early c19th 'Gentleman's Turning' Ebony and ivory (\$195) - Early c20th Chinese ivory carving (\$2,985)	Yes	N/A
106	[REDACTED]		6/5/18	Yes - worked	- 2 ivory carved tusks pre 1940 African origin (\$495 and \$350) - Silver and ivory paper knife Birmingham 1905 (\$395) - Hand carved Chinese ivory vase c1900 (\$125) - Earrings	Yes	- Tusks Africa pre-1940 - Knife UK 1905 - Vase 1900 not sure of origin

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
Didn't talk	N/A	N/A	N/A	N/A	N/A	Yes: - Walrus ivory seam 1820 - Whalebone seam 1779 - Whalebone sailors fids - Horn?
Didn't talk	N/A	N/A	N/A	N/A	N/A	Yes: - Tiger claw necklace India c1840 (\$8,000) - Trophy necklace Red Deer eye teeth Bavaria c1870 (\$2,500) - 5 convict whale bone spoons TAS c1880 (\$1,750) - Hippo tusk photo frame English c1900 (\$1,750) - Killer whale teeth c1866 (\$6,500)
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
Didn't talk	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	Seller advised of vase, "No you can't take back to the UK it's a non-exportable item."	No	CORRECT Seller said that it was simply a non-exportable item, not that I could export it with the correct provenance documentation. INCORRECT Seller said that it was simply a non-exportable item, not that I could export it with the correct provenance documentation.			No

Trade in elephant ivory and rhino horn
Submission 65 - Attachment 2

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
107	[REDACTED]		6/5/18	Yes - worked	<ul style="list-style-type: none"> - Japanese ivory netsukes 1930-50 (\$475, \$450, \$400, \$450) - Ebony elephant with ivory tusks 	Yes	Japanese 1930 - 1950
108	[REDACTED]		6/5/18	Yes - worked	<ul style="list-style-type: none"> - Ivory beads and earrings c1940 (\$120) - Chinese ivory carved junk boat c1930 (\$1,500) 	Yes	Necklace and earrings are from India 1940
109	[REDACTED]		6/5/18	No	N/A	N/A	N/A
110	[REDACTED]		6/5/18	Yes - worked	<p>Substantial collection of ivory including:</p> <ul style="list-style-type: none"> - Dutch ivory knife handle c1680 (\$760) - Ivory container with numbered Whist counters c1850 (\$85) - Chinese export ivory parasol handle early c19th (\$960) - Plinth (\$1c450) - Ivory disks Chinese export (\$125) - Ivory column with thermometer c1810 - English ivory chess set early c19th London (\$1,450) - Ivory Snuff box with miniature c19th (\$780) - Large Japanese ivory archeress (\$2,400) 	Yes	N/A
111	[REDACTED]		6/5/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised to "just wrap them in a bundle in your luggage and don't say anything." adding "there are big rules around ivory now."	No		Seller advised to put in luggage and not declare.		No
No documentation No paperwork	Seller advised me to "Just post them". She said "There are issues, that's why they are cheap. Just say they are bone on the package. I can write bone on receipt. It's fine before 1950." Other seller later came back to me and said that he had looked up the laws on ivory and found that I would need a 'CERAS' (sic) certificate but that he couldn't organise at short notice. He admitted "I need to do a bit of research around this actually."	No but another acronym (CERAS?) not sure if that's what he actually meant	CORRECT Seller later came and found me and advised me that I would need a certificate to export. He mentioned a CERAS certificate. Not sure if he meant CITES or something else? INCORRECT "Initially seller gave wrong advise and told me to post them and write bone on package and said she could write bone on receipt."	Initial advice was to post them and write bone on package.	He seemed to be aware of the 'big rules' surrounding ivory, but proceeded to get around these by posting the items and saying they are bone. He did his due diligence and researched the rules and advised that I needed documentation and that they couldn't organise in time.	No
N/A	N/A	N/A	N/A	N/A	N/A	No
Didn't talk	N/A	N/A	N/A	N/A	N/A	N/A
N/A	N/A	N/A	N/A	N/A	N/A	No

Trade in elephant ivory and rhino horn
Submission 65 - Attachment 2

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
112	████████		6/5/18	Yes - worked	Substantial selection of ivory including: - 2 carved ivory horses c1900 (\$450 each) - Vintage ivory kangaroo (\$825) - Folding scissors c1880 (\$225) - Carved ivory sewing instrument (no date) (\$115) - Corkscrew (\$95) - Ivory figurine French c1890 (\$650) - Carved ivory parasol handle French c1900? - Carved ivory handle Dieppe c1880 (\$300) - Carved okimono (date not visible) - Ivory tigers and elephant carving c1900 (\$225) - Carved ivory card case French c1820 (\$495) - Long strand of graduated ivory beads (no date on label) (\$600)	Yes	Dates and origin marked in item description if labelled. I enquired about necklace and seller replied "I know they were made in 1900 from the UK."
113	████████		6/5/18	Yes - worked	- c19th silver and ivory creamer 1827 St Petersburg (\$1,250) - 2 other ivory items but not recorded	Yes	1827 St Petersburg
114	████████		6/5/18	No	N/A	N/A	N/A
115	████████		6/5/18	No	N/A	N/A	N/A
116	████████		6/5/18	No	- Ivory and tortoiseshell table box India c1910 (\$695) - Ivory page turner Indian c1900 (\$550) - Sandalwood and ivory jewellery box India c1900 (\$2,000)	Yes	India c1900

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	Seller advised that the beads were "pre-1947 so OK, I can write on receipt, no need for anything else, just wear them that's what I do."	No	CORRECT Seller mentioned correct date 1947 INCORRECT Seller advised that a receipt would be sufficient documentation and to not declare the item.	Seller advised me to wear the beads and not declare them.		No
Not sure about documentation No paperwork	Seller advised "You can't take it back with you it's a prohibited item. You could say it's plastic or bone like everyone on the internet does now, like tortoiseshell is labelled 'faux tortoiseshell'. Seller advised "I wouldn't personally risk it as I could lose my licence but as an individual for personal use you could."	No just said item was prohibited	CORRECT Seller said that it was a prohibited item INCORRECT Seller advised that I couldn't export to the UK, even with documentation			No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
No documentation No paperwork	I enquired about jewellery box and seller advised "Just don't say anything. Say it's bone we could write it up for you." When I asked if that was legal she whispered "No but what they don't know."	No	INCORRECT Seller advised that I shouldn't say anything or declare item and to say it was bone.	Seller knowingly gave illegal advice, saying I shouldn't declare it and to say it was bone, offering to write up for me.		Yes: – Some bone and tortoiseshell items

REF	Retailer	Type of retailer	Date	Seller of Ivory? Raw or worked?	Description of the item and price (\$) where known/visible	Labelled as ivory?	Origin (date/place)
117	[REDACTED]		6/5/18	No	<ul style="list-style-type: none"> - c19th ivory notebook (\$895) - Carved ivory figure (not labelled) - Carved large figurine (not labelled) - Anglo Indian sewing box with ivory inlays c1850 (\$4,500) - Japanese ivory jewelled elephant Meiji period 1868-1912 (\$550) 	Three items labelled, two items not labelled	All labelled items c19th
118	[REDACTED]		6/5/18	No	N/A	N/A	N/A
119	[REDACTED]		6/5/18	Yes - worked	<ul style="list-style-type: none"> - c19th ivory snuff box - Rococo ivory figure c1740 - Two okimono Japanese fisherman 1880 (\$5,500) 	Yes	- Snuff box c19th, Rococo figure 1740, Japanese okimono 1880
120	[REDACTED]		6/5/18	No	N/A	N/A	N/A
121	[REDACTED]		6/5/18	No	N/A	N/A	N/A

Provenance documentation? Paperwork?	Understanding of provenance documentation?	Did the seller mention CITES?	Advice on export: Correct/Incorrect	Illegal advice offered	General comments	Other wildlife on sale
No documentation No paperwork	On enquiring about the elephant, the seller advised "you aren't allowed to bring into the country or out, you can only buy and sell here." Seller wasn't sure about UK laws saying "I'll have to google them. I know they are clamping down because of killing elephants but its not as if items like this have an impact."	No	CORRECT Seller advised that I couldn't take into or out of country and to check UK rules.	Seller said that people "often put in luggage." but didn't actually advise me to.		No
N/A	N/A	N/A	N/A	N/A	N/A	No
Didn't talk	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No
N/A	N/A	N/A	N/A	N/A	N/A	No

RECOMMENDATIONS

Over the years, IFAW has been monitoring auction houses, online market platforms and antique dealers and we can conclusively report that there is a demand and plentiful supply of ivory and other wildlife products here in Australia.

IFAW believes that whilst elephants are still being killed for their ivory, antiques dealers should stop selling ivory items, to prevent the legal market from providing a cover for illegal sales. In the interim, IFAW is calling on the antiques dealers to clean up their act and ensure proper documentation and verbal advice given at the point of sale is legally correct.

IFAW

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