

**Written evidence to the House of Commons Public Bill Committee on the Ivory Bill  
by Wildlife and Countryside Link**

**June 2018**

Wildlife and Countryside Link (Link) brings together 48 environment and animal protection organisations to advocate for the conservation and protection of wildlife, the countryside and the marine environment. Link is the biggest coalition of environmental and animal protection organisations in England. Our members practice and advocate environmentally sensitive land management and high welfare standards for livestock and wildlife. They encourage respect for and enjoyment of natural landscapes and features, the historic and marine environment and biodiversity. Taken together we have the support of over eight million people in the UK and manage over 750,000 hectares of land.

This response is supported by the following organisations:

- Born Free Foundation
- Environmental Investigation Agency
- Four Paws UK
- International Fund for Animal Welfare
- Naturewatch Foundation
- RSPCA
- Whale and Dolphin Conservation

*This submission is made on behalf of Wildlife and Countryside Link's Wildlife Crime and Trade Working Group. Note that a number of Link member organisations have also provided oral and/or written evidence to the Public Bill Committee, either individually or collectively.*

1. We welcome the Government's Ivory Bill as a positive commitment to addressing the scourge of poaching which continues to devastate elephant populations and threaten the very future of this iconic species. The Bill represents a strong response following overwhelming calls from wildlife organisations, politicians and the wider public for the UK to take decisive action on this issue of global importance.
2. We urge the Committee to ensure that the Bill will bring an end to all commercial trade in elephant ivory to, from and within the UK, with any exemptions being limited to circumstances that could not possibly have a negative impact on elephants. As such, exemptions need to be very limited, clearly defined, easily identified and tracked, and readily enforced.
3. We strongly recommend a highly precautionary approach to any commercial imports and exports of ivory items, or online trade which is very difficult to regulate.
4. The onus should fall on owners of items that may fall within exemptions who wish to sell them, to provide documentary proof of their legal acquisition and provenance, and to ensure items are clearly and individually identified on exemption certificates to prevent any possibility of laundering or misuse of certificates. APHA should be tasked with scrutinising all applications for registration of exempt items, which should not prove onerous since such items should be small

Wildlife and Countryside Link  
89 Albert Embankment  
London  
SE1 7TP

T: 020 7820 8600  
F: 020 7820 8620  
E: [enquiry@wcl.org.uk](mailto:enquiry@wcl.org.uk)

'Wildlife and Countryside Link is a unique coalition of voluntary organisations concerned with the conservation and protection of wildlife and the countryside.'

Chair: Dr Hazel Norman    Director: Dr Elaine King

A company limited by guarantee in England & Wales  
Company No. 3889519    Registered Charity No. 1107460



in number, particularly those identified in Section 2 of the Bill which should be limited to the “rarest and most important” items of their type.

5. The Bill should clearly specify that all trade in raw ivory is banned (i.e. raw ivory cannot be sold under any of the exemptions).
6. If possible the Bill should be enacted before the IWT conference in October 2018, and should take effect as soon as possible, in order to ensure the UK will be in a strong position to send a powerful message to other countries at that meeting.
7. While recognising the importance of securing a ban on elephant ivory, the Committee should be minded to ensure provisions are made to prevent perverse consequences for other ivory-bearing species such as hippo, narwhal and walrus.
8. Adequate resourcing of licensing and enforcement authorities, including the APHA, National Wildlife Crime Unit, and Border Force CITES team, and raising awareness of the new rules, will be critical to the effectiveness of the legislation.
9. With regard to sanctions, we note that the bill follows the modern process of allowing offences to be dealt with by civil sanction or through the criminal courts. The agency(ies) responsible for investigating offences under this Bill, and imposition of civil sanctions, need to be clearly identified, with a clear mandate for such offences to be given a high priority.
10. Any guidance accompanying the Bill will be critical and stakeholders should have the opportunity to provide input into its development. Wildlife and Countryside Link stands ready to provide further information and participate in guidance development.

**Contact:** Zoe Davies (Policy and Campaigns Manager, Link) e: [zoe@wcl.org.uk](mailto:zoe@wcl.org.uk) t: 0207 820 8600

