

Ivory and Its Place in Museum Collections

Long used as a material for artistic creations, ivory has increasingly become a source of controversy. While the material has been used to create beautiful works of art, issues relating to the endangerment and possible extinction of the animals that are the source of ivory have caused legislation to limit trade in the material. For people working in museum collections, it is crucial to know what the legislation concerning ivory and other materials relating to endangered species does and does not allow. Beyond that, it is also important to consider the implications of museum-sanctioned collecting in regard to ivory. To better understand the difficulties surrounding ivory in museum collections, this paper will provide background about the collection and use of ivory historically, explain the legislation currently affecting ivory trade in the United States, and discuss the ethical dilemmas associated with ivory in museum collections.

The first step to understanding ivory in museum collections should be to identify precisely what the term means. The word "ivory", while often used to describe elephant tusks, actually covers a much broader array of materials. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), the major international agreement which limits the trade in ivory, defines it as, "Any mammalian tooth or tusk of commercial interest which is large enough to be carved or scrimshawed."¹ Ivory can be sourced from the tusks of many mammals, including walrus, narwhal and mammoth tusks. Some animals also possess teeth suitable for ivory trade, including hippopotami, sperm whales and killer whales. Although animals are often killed before ivory is collected, ivory can be taken from living animals. Today,

¹ Edgard O. Espinoza and Mary-Jacque Mann, *Identification Guide for Ivory and Ivory Substitutes*, (Washington, D.C.: World Wildlife Fund, TRAFFIC, in Cooperation with the CITES Secretariat, 1992), 4.

much of the discussion surrounding the ivory trade is focused on elephants, as the animal has been and continues to be hunted specifically for its tusks and their use as ivory. Once removed from the animal, ivory is often carved or otherwise shaped. While ivory has historically been selected for many purposes, it is most often a decorative choice, a material selected for its aesthetic appeal.

The origins of ivory use and trade extend far beyond written record. Carl W. Bishop, a scholar and a former Associate Curator at the Freer Gallery of Art (in the Smithsonian), argues that since Paleolithic times, ivory has been, "one of the principal media for the expression of aesthetic impulses of the artist".² While this trading would likely have passed ivory from one nomadic tribe to another, the establishments of large civilizations of people in Africa, Southern Europe and Asia provide later examples of ivory and its trade on a large scale. Written records detail Egyptian kings being brought Asian elephants and having them killed for their ivory. Along the Mediterranean, the Greeks used ivory, especially in many of their cult statues. Famously, the Athena Parthenos, a massive statue of the goddess which once stood in the Parthenon in Athens, was constructed of ivory and gold. Although the chryselephantine statue has been missing for many centuries, several accounts describe the use of ivory for Athena's face and arms. Perhaps the most famous producer of ivory goods is China. For thousands of years, Chinese artisans have been producing works of ivory which include elegant hair pins, combs and cups.

While these are only a few examples of the ancient uses of ivory, it is important to note that the material has long been used for artistic expression and has carried with it a sense of

² Carl W. Bishop, "The Elephant and Its Ivory in Ancient China". *Journal of the American Oriental Society* 41. American Oriental Society (1921): 290.

prestige. Ivory was historically provided to the ruling class, used in ornate religious expression, and carved as a decorative art. Ivory continues to be viewed as having a high value and allure. Because of the continued appeal of ivory, artists with a high degree of skill have historically opted to work with ivory. For many centuries, skilled carvers have been producing works of art crafted out of ivory. As such, many museums have pieces of ivory in their collections in either fine or decorative art pieces. While the contemporary issues associated with ivory, namely the endangerment of several species of animal, make the material less appealing today, it should be recognized that ivory has been used in many works of art and in objects with great material value.

The appeal of ivory continued through the 19th century, and the impact of the ivory trade was clearly evidenced in the demise of the African elephant population. In 1800 there were approximately 26 million African elephants. During the century that followed, this number steadily decreased. In an increasingly materialistic world, ivory continued to be valued and used in a growing number of ways. By 1900 the number of African elephants dropped to 10 million, a number which fell further as a craze for the African safari sparked further poaching of African elephants. Throughout the 20th century the African elephant population persistently declined, in large part because of the popularity of ivory. Eventually, pressures which the trade put on the African elephant population led to U.S. legislation.³

Federal legislation relating to endangered species began in the United States in 1900. It should be noted that although ivory trade is a global issue, museum professionals in the United

³ Elaine Larson. "The History of the Ivory Trade." *National Geographic*. February 25, 2013. education.nationalgeographic.org/media/history-ivory-trade.

States should be especially concerned with the domestic legislation and international agreements which this country supports. The first federal bill regarding conservation was passed in 1900 and is commonly called the Lacey Act, as it was written by Iowa congressman, John F. Lacey. This fairly comprehensive law set the tone for U.S. regulation of fish, wildlife and plants. The Lacey Act specifically makes it illegal to: "import, export, sell, acquire, or purchase fish, wildlife or plants that are taken, possessed, transported, or sold: 1) in violation of U.S. or Indian law, or 2) in interstate or foreign commerce involving any fish, wildlife, or plants taken possessed or sold in violation of State or foreign law."⁴ As there were no foreign or domestic laws prohibiting the trade in ivory at the time, this law did not prevent ivory trade in the United States. Accordingly, ivory continued to be a popular material for many products, including billiard balls, combs, statues and figurines, and piano keys. The trade of ivory in the United States continued to prosper until the 1970s.

In 1973, the United States passed the Endangered Species Act (ESA, 16 U.S.C. 1531). Today, the ESA limits the trade of African elephant ivory through the addition of an international trade agreement. As mentioned above, the Convention on International Trade of Endangered Species of Wild Flora and Fauna (CITES) is an international agreement with the aim of preventing any trade which threatens the survival of plant or animal species. In a meeting in Washington, DC in 1973, the text was agreed upon by 80 nations.⁵ Two years later, in 1975, the United States became an official party to the agreement and implemented CITES under the ESA.

⁴ "Lacey Act." *Fish and Wildlife Service*. <http://www.fws.gov/international/laws-treaties-agreements/us-conservation-laws/lacey-act.html>.

⁵ "What Is CITES?" *CITES*. <https://www.cites.org/eng/disc/what.php>.

Since its inception, CITES has grown and there are now 182 participating countries resulting in a near world-wide ban on this type of trade.

The actions of the United States to diminish the ivory trade were furthered with the 1977 passage of the African Elephant Conservation Act.⁶ This act functions with the CITES Ivory Control System to further protect African elephants as the species is especially vulnerable to and damaged by the ivory trade. Additionally, administrative actions, by way of Director's Order No. 210 from the Department of the Interior, U.S. Fish and Wildlife Service, provide regulations for the implementation of these laws. As recently as July 6, 2016, the ESA regulations concerning African elephant ivory were revised to provide additional protections for these increasingly endangered species.⁷ The intent of this legislation is not to outlaw all ivory, but to protect the endangered animals from which some ivory is sourced.

As not all ivory trade is illegal, museums need to know what is legally permitted concerning both importation and domestic trade. It is important to note that almost all U.S. legislation concerning ivory trade limits only the trade in African elephant ivory and not ivory from other species. In discussing the restrictions on this trade, the term, *ivory*, will be used to mean African elephant ivory, and not the material generally.

Regarding the importation of ivory, there are a number of regulations and exemptions of which museums need to be aware. First, it is currently illegal to import African elephant ivory for commercial purposes. This regulation means that with few exceptions museums are not allowed to purchase works containing ivory outside of the United States and import them into the

⁶ Rebecca Buck and Jean Gilmore. *Museum Registration Methods*. (Washington, DC: AAM Press, 2010), 332.

⁷ Endangered and Threatened Wildlife and Plants; Revision of the Section 4(d) Rule for the African Elephant (*Loxodonta africana*). 81 FR 36387. July 6, 2016

country.⁸ Additionally, museums should be wary of accepting objects through gift or bequest which may have once been illegally imported. A hypothetical ivory figurine may have been brought into the United States for commercial use before being offered as a donation to a museum. Provenance information would be necessary to ensure that this work was not illegally imported.

Works of ivory of non-commercial use may be imported if they meet one of several exemptions. The exemptions which are most pertinent to museums include: musical instruments, scientific specimens, traveling exhibitions and antiques. Objects in the first three categories must have been legally obtained prior to February 26, 1976, the date on which the African elephant was listed under CITES. Additionally, objects must be accompanied with a certificate of pre-CITES status and documentation of legal export. Thorough documentation is key for the legal importation of works of ivory.⁹

Antiques works of ivory require even more documentation. In order to qualify for this exemption, items must be more than 100 years old, and must not have been modified with any new ivory since December 27, 1973. That is to say that if a work was repaired using newly sourced ivory in the 1980s, the work would no longer be exempt. But if the piece has had no ivory added since the African Elephant Conservation Act was passed and it is currently over 100 years old, it can be imported. Ivory of this status must also be accompanied by the proper documentation to certify that it does meet the standards necessary for exemption.¹⁰ Pieces of ivory, for which the antique status is claimed, must enter the country through one of the

⁸ Kevin P. Ray. "U.S. Criteria for the Antique Exception to the Ivory Ban." December 1, 2014.

⁹ "What Can I Do with My Ivory?" U.S. Fish & Wildlife Service. <https://www.fws.gov/international/travel-and-trade/ivory-ban-questions-and-answers.html>

¹⁰ Rebecca Buck and Jean Gilmore, *Museum Registration Methods*, (Washington, DC: AAM Press, 2010), 333.

country's thirteen specially designated ports. Initially this exemption applied to both commercial and non-commercial uses of ivory, but in recent years the restrictions have been tightened on ivory imports. It is important to note that ivory legislation is still changing and will likely continue to change as governments struggle to find the most effective way of preserving African elephants and the other species which will be impacted by the ivory trade.

The trade of ivory domestically, across state lines has also changed within recent years. The commercial use of ivory is allowed within a state as long as the work can be proved to have been legally imported. Often, this means a pre-CITES certificate and import documents. While the commercial use is generally allowed, some states develop additionally laws regulating ivory which should be studied. Previously, the sale of ivory across state lines was similar to the regulations concerning sales within a state. However, changes to the law have made interstate sale more difficult. Now, if the sale of ivory crosses state lines, one or more of the import exemptions described¹¹ above must be met.

As legislation is likely to continue to change regarding ivory, it is important for museum professionals, especially those working in collections management, to remain informed so as to avoid any potential legal complications. One pressing way this legislation will impact museums is the acquisition of new objects. Before a museum acquires anything new, the objects should be carefully considered. Best practice in collections management requires that museums evaluate each object that they intend to accession in order to determine whether the object fits into the scope and mission of the collection. Often an investigation into the history and provenance of an object is necessary to make this determination. While museums should be sure that the objects

¹¹ "What Can I Do with My Ivory?" U.S. Fish & Wildlife Service. <https://www.fws.gov/international/travel-and-trade/ivory-ban-questions-and-answers.html>

they acquire fit their mission, at the very least, museums need to be sure what they acquire is legal.

Knowledge of ivory legislation may prevent museums from acquiring works illegally. Museum professionals who are knowledgeable about these laws will also know the documentation necessary to prove the legality of an object and can request the pre-CITES certification from the seller. Smugglers of illegal ivory have adopted a practice of "aging" ivory, or coloring and marking ivory in such a way as to make it appear as though it meets the antiquities exemption of CITES. Museum professionals must be aware of modern ivory that is being passed off as legal through this guise. Obviously, museums should avoid acquiring any fraudulent works. Purchasing a disguised piece of ivory would not only be a waste of funds but also illegal.

Similarly, museums should carefully examine their collections to ensure that the objects therein were legally obtained and are currently legally held. During the last twenty years museums have become increasingly interested in examining the legality of their collections. In the 1990s, the passage of the Native American Graves Protection and Repatriation Act (NAGPRA) forced any museum which receives federal funding (excluding the Smithsonian which has its own legislation) to examine its collection and repatriate certain Native American cultural objects. Similarly, in the 1990s there was an increased interest in identifying Nazi era looted art and cultural property generally. Museums were increasingly aware of the need to examine their collections and ensure that the objects they held complied with all legislation. Likewise, museums should search their collections for ivory and other CITES regulated materials to ensure the legality of these objects.

Unlike the objects identified through NAGPRA or those which have been uncovered as having bad title due to Nazi era looting, works of illegal ivory cannot be returned to a rightful owner. Elephants are nearly always killed in the process of obtaining ivory and even if these animals were living, there would be no reasonable need or way to return their tusks. Instead, ivory determined to be illegal is turned over to the government, in the case of the United States, to the U.S. Fish and Wildlife Service (FWS). When in the possession of the FWS, illegal ivory will either be stored out of public view or destroyed. Because the works will not be enjoyed by the public or used for interpretive or educational purposes, some museum professionals may be reluctant to identify and inform the FWS of illegal ivory. However, there are several lines of argumentation as to why the forfeiture of these objects by the museum to the government is important.

The first is most simply that museums should be in compliance with all legislation. Additionally, museum collections are held in the public trust and museums serve the public. While some museum professionals feel as though it is their duty to the public to protect the illegal objects, a better view of the subject would indicate that it is the duty of the museum to protect the collection as a whole. That is to say that museums should not prioritize the safety of the illegal objects in their collection over the ability of the museum to care for the collection as a whole. If a museum has purchased a work of illegal ivory it could be argued that the organization was knowingly participating in the illegal ivory trade. Such knowledge could diminish public esteem for and trust in the museum. The ivory trade is a contentious issue and the museum could quite easily find itself in the midst of a scandal. Not only could financial contributions from the

public be affected, attendance may also fall. If a museum cannot garner the support of the public, it will be difficult for the organization to survive.

Further, by reporting illegal ivory in collections, museums may be able to contribute to preventing future illegal trade. Identifying illegal objects within collections will cause museums to reexamine those people from whom they purchased the objects. If someone knowingly sold the museum an illegal work, the museum should know not to purchase from that person again. Also, the museum can report the seller and possibly assist the government in uncovering illegal ivory trade routes. Even if the work was not known to be illegal, the museum should consider whether or not that seller can be trusted to know the provenance of objects in future purchases. Museums cannot be complicit in holding illegal ivory.

Another pressing implication of ivory legislation for museums is the contracting of international loans. The loaning of objects is an important way for museums to share their collection with audiences they would otherwise not reach and for museums to be able to display and interpret objects to which they otherwise would not have had access. Both international and domestic loans of objects containing ivory have become increasingly complicated with recent regulations. The museums involved in the loaning process must know the import/export policies of the countries involved as well as state laws. Because ivory is increasingly being regulated, museums must coordinate to have the proper documentation to ensure that the works are legal to cross international and state boundaries. Additionally, the proper documentation will not always result in the speedy processing of ivory objects at customs. Museums should recognize that even if legislation does not prevent the importation of certain types of ivory for non-commercial purposes, it may take longer for objects made of or adorned with ivory to pass through customs

as these objects and their associated paperwork must be carefully examined. All parties involved in the loan agreement should know that the international or interstate lending of ivory objects may encounter additional difficulties and be prepared for these situations.

As has been stated, it is important for museum professionals to understand and comply with all legislation regarding the illegal ivory trade. However, some museum professionals wonder if complying with laws is enough of an effort toward ending the trade in illegal ivory. In November 2015, the American Institute for Conservation of Historic and Artistic Works (AIC) published a position paper on the impact of U.S. legislation on African elephant ivory in relation to cultural property. Generally, AIC outlines that they are concerned with cultural heritage property and in fact act as its advocate even when it is comprised of materials from endangered species, but that the organization supports efforts to protect endangered animals. They write, "We believe that respecting the cultural, legal, and ethical issues regarding the conservation of the African elephant is not mutually exclusive from preserving historic and artistic examples of ivory cultural heritage."¹² Because AIC believes that the preservation of ivory pieces is not necessarily at odds with ending the illegal ivory trade, they propose that conservators and other professionals trained to work with cultural property be brought into the discussion and process of deciding what to do with ivory. AIC would like ivory to be identified by species when possible. Most legislation limiting ivory trade is related to species which are already endangered, and AIC is less concerned with prohibiting trade of ivory from non-endangered species. Also, the institute would like objects to be dated through, "written and photographic records, documentation, and

¹² American Institute of Conservation Position Paper, "The Preservation of Cultural Property with respect to U.S. Government Regulation of African Elephant Ivory", 3

history," to establish whether the ivory is legal to acquire. The implication of this is that AIC is willing to use whatever sources possible to prove an object to be legal.

AIC would also like to see cultural heritage experts consulted before ivory objects are destroyed as part of a crush-and-burn initiative. Just five months before AIC released their policy paper, the United States Fish and Wildlife Service hosted a highly publicized ivory crush in New York City's Times Square. The large scale, public destruction of ivory has become a popular tactic used by several governments to denounce the trade of illegal ivory. While some organizations opt to crush the ivory into small and monetarily worthless pieces, others have set fire to large piles of ivory as another means of destroying the material. The first U.S. crush took place in Colorado in 2013 and destroyed six tons of elephant ivory. The ivory in this crush had been seized by officials over a period of year and had been stored with other illegally transported wildlife material. Similarly, the crush in NYC was of ivory seized by government officials. While there are concerns about the efficacy of crushes on impacting ivory trade, AIC's worry is that there may be materials in these crushes that are legal and of historic or artistic value. They recommend that cultural heritage workers be brought on to review the materials before a crush takes place.

While the policy outlined by AIC does not seem too controversial, it does raise a few important questions for museum professionals to consider. First, AIC Code of Ethics states, "While recognizing the right of society to make appropriate and respectful use of cultural property, the conservation professional shall serve as an advocate for the preservation of cultural

property."¹³ Like members of AIC, museum professionals also advocate for the preservation of cultural property. But is this the same as being advocates for pieces of cultural property? It could be argued that not all cultural property is preserved at the same rate or even to the same degree. This issue is highlighted when it comes to the question of ivory. Legal works of ivory in museum collections are works of cultural property that are cared for, preserved, interpreted, displayed and used for educational purposes. Works of ivory that may have been made just a year later or works which are older but which have been altered are not preserved but are slated for destruction. Few in the museum field seem to doubt the obligation to care for legal works of ivory of historic, artistic and scientific value. But there is less consensus about whether these later and illegal works of ivory could also be deemed pieces of cultural property. If so, museums and others working with cultural property should consider whether there is an obligation to illegal ivory as cultural property or if museums have a greater obligation to elephants as a living piece of cultural heritage.

If museums recognize an obligation to preserve the species involved in the ivory trade, they must also recognize whether or not museums contribute to destructive behavior. Currently, the Association of American Art Directors and the American Alliance of Museums have published very little regarding the implications of the display of ivory in museums. Much of their publication on the subject of ivory has been encouraging museums to comply with legislation

¹³ American Institute of Conservation Position Paper, "The Preservation of Cultural Property with respect to U.S. Government Regulation of African Elephant Ivory", 2

and helping explain that process.¹⁴ However, there seem to be other ways in which museums may involve themselves in the ivory trade beyond buying and selling illegal pieces.

There is a belief that museum professionals should not display their own objects in an exhibition because in associating the object with the museum they may increase the value of the object. This same idea that the display of an object in a museum may make it more valuable is implied in several best practice prohibitions. If the display of an object in a museum increases its value, if museums are as influential as museum professionals believe them to be, then museums are inadvertently contributing to the ivory trade simply by displaying ivory goods. The act of exhibiting ivory may make it appealing and could be contributing to the perpetuation of the ivory trade.

If displaying ivory does add value to the material, museums can combat their role in the ivory trade through education. There are many natural history and science museums that are using their platform to educate the public on the harms of the ivory trade and the devastation of the African elephant population. Pieces from U.S. FWS crushes are distributed to museums and other educational organizations expressly for the purpose of educating the public about the ivory trade. Slightly outside the scope of these types of museum, the National Postal Museum used wildlife stamps to broach this same discussion. The Crime Museum hosted an exhibit about wildlife trafficking, including ivory, before it closed.¹⁵

¹⁴ "Oversight Hearing on 'The U.S. Fish and Wildlife Service's Plan to Implement a Ban on Commercial Trade in Elephant Ivory'" Presentation, Association of Art Museum Directors, June 24, 2014.

¹⁵"Ivory, Tortoise Shell & Fur: The Ugly Truth of Wildlife Trafficking." Crime Museum. June 2015. <http://www.crimemuseum.org/temporary-exhibits>.

While there are museums discussing illegal ivory and the harms of the trade, few art and history museums are participating. If displaying ivory in a museum can increase its value, these institutions seem to be the most influential in determining market value. Works of fine and decorative art which are made of or use ivory and are displayed in art and history museums may influence the purchase of other works of ivory from illegal markets. Many exhibits which include ivory or are exclusively about works of ivory, do not broach the subject of the illegal ivory trade and its implications. However, there are a few exhibitions which use the display of ivory as a talking point not only for the craft and artistry of ivory carving but also to discuss the harmful effects of the ivory trade. To give just one example, in 2015 the World Chess Hall of Fame put on an exhibit titled, *Encore! Ivory Chess Treasures from the Jon Crumiller Collection*. The exhibit showed ivory chessboards and pieces from one collection while also discussing the complexity and difficulties surrounding the ivory trade and the debates about how best to preserve the species involved.¹⁶

Although it is encouraging to see museums use ivory to interpret the current issues surrounding the material, ivory will likely continue to be an issue both in museums and in its impact on a larger global scale. The illegal ivory trade harms the species involved and the people who contribute to the trade are often part of larger smuggling rings which also participate in trafficking drugs, arms and enslaved humans across international borders. As such, museums need to carefully evaluate what role they play in the illegal ivory trade. This role may be one of knowingly buying into the system by purchasing or harboring illegal ivory. It may be one of

¹⁶ Bailey, Shannon, and Emily Allred. "Encore! Ivory Chess Treasures from the Jon Crumiller Collection." World Chess Hall of Fame. May 14, 2015. <http://www.worldchesshof.org/exhibitions/exhibit/encore/>.

unintentional encouragement by displaying ivory and thus perpetuating its status as a luxury good. Or museums may play a role in diminishing the impact of the ivory trade globally by educating the public on the dangers of purchasing modern ivory. Whatever the role of the museum in this trade it is important for collections professionals to have a working knowledge of both the history and the current status of the ivory trade. Ivory legislation will continue to be important to museums, not only because it will likely keep changing, but also because ivory is an important substance in artistic, historic and scientific works and will likely remain in museum collections for many years to come.

Bibliography

- Bailey, Shannon, and Emily Allred. "Encore! Ivory Chess Treasures from the Jon Crumiller Collection." *World Chess Hall of Fame*. May 14, 2015.
<http://www.worldchesshof.org/exhibitions/exhibit/encore/>.
- Bishop, Carl W.. 1921. "The Elephant and Its Ivory in Ancient China". *Journal of the American Oriental Society* 41. American Oriental Society: 290–306.
- Buck, Rebecca, and Jean Gilmore. 2010. *Museum Registration Methods*. Washington, DC: AAM Press.
- Cutlip, Kimbra. "Where Do Important Ivory Artifacts Fit in the Race to Save Elephants from Poaching?" *Smithsonian Magazine*, June 18, 2015.
- "Director's Order No. 210." U.S. Fish & Wildlife Service.
<https://www.fws.gov/policy/do210.html>
- Espinoza, Edgard O., and Mary-Jacque Mann. 1992. *Identification Guide for Ivory and Ivory Substitutes*. Washington, D.C.: World Wildlife Fund, TRAFFIC, in Cooperation with the CITES Secretariat.
- Fish and Wildlife Service. "Endangered and Threatened Wildlife and Plants; Revision of the Section 4(d) Rule for the African Elephant (*Loxodonta Africana*)." *Office of the Federal Register*. 81 FR 36387. July 6, 2016.
https://www.federalregister.gov/documents/2016/06/06/2016-13173/endangered-and-threatened-wildlife-and-plants-revision-of-the-section-4d-rule-for-the-african?utm_campaign=subscription+mailing+list&utm_medium=email&utm_source=federalregister.gov
- "Ivory." Victoria and Albert Museum. <http://www.vam.ac.uk/page/i/ivory/>.
- "Ivory, Tortoise Shell & Fur: The Ugly Truth of Wildlife Trafficking." *Crime Museum*. June 2015. <http://www.crimemuseum.org/temporary-exhibits>.
- Jones, Jonathan. "Ivory: The Elephant in the Art Gallery." *The Guardian*, May 15, 2014.
- Gaiimo, Cara. "Burn It? Crush It? The Historic Problem of Seized Ivory." *Atlas Obscura*, June 25, 2015.
- "Lacey Act." *Fish and Wildlife Service*. <http://www.fws.gov/international/laws-treaties-agreements/us-conservation-laws/lacey-act.html>.

- Larson, Elaine. "The History of the Ivory Trade." *National Geographic*. February 25, 2013.
education.nationalgeographic.org/media/history-ivory-trade.
- Narula, Svati Kirsten. "Crush and Burn: A History of the Global Crackdown on Ivory." *The Atlantic*, January 27, 2014.
- Neme, Laurel. "One Country Will Destroy Its Ivory -and Pray for Elephants." *National Geographic*, January 25, 2016.
- "Oversight Hearing on 'The U.S. Fish and Wildlife Service's Plan to Implement a Ban on Commercial Trade in Elephant Ivory'" Presentation, Association of Art Museum Directors, June 24, 2014.
- Phelan, Ben. "An Overview of Current Ivory Law." *PBS*. September 11, 2014.
<http://www.pbs.org/wgbh/roadshow/stories/articles/2015/06/22/ivory-law>.
- Ray, Kevin P. "Collateral Damage: Ivory Ban's Effects on Collectors, Museums, Musicians and the Art Trade." *Art Ban, Stolen Art*, November 24, 2014.
- Ray, Kevin P. "Qualifying for the Antique Exception to the Ivory Ban." *The National Law Review*, December 2, 2014.
- Ray, Kevin P. "U.S. Criteria for the Antique Exception to the Ivory Ban." *Art Ban, Stolen Art*, December 1, 2014.
- "Revisions to the Endangered Species Act (ESA) Special Rule for the African Elephant Questions and Answers." U.S. Fish & Wildlife Service.
<https://www.fws.gov/international/pdf/questions-and-answers-african-elephant-4d-final-rule.pdf>.
- "U.S. Ivory Crush Questions and Answers." U.S. Fish & Wildlife Service.
<https://www.fws.gov/international/pdf/factsheet-ivory-crush-qa.pdf>
- "What Can I Do with My Ivory?" U.S. Fish & Wildlife Service.
<https://www.fws.gov/international/travel-and-trade/ivory-ban-questions-and-answers.html>
- "What Is CITES?" *CITES*. <https://www.cites.org/eng/disc/what.php>.