

Written evidence submitted by Edric van Vredenburg (IVB18)

Dear Mr Chairman

My name is Edric van Vredenburg I have been an antiques and art dealer and collector of 55 years standing now retired for some time only collecting. I think I have a reasonable knowledge in the area under discussion; I have served on several Vetting Committees officiating at Art and Antiques Fairs, in various countries [Switzerland, Belgium , The United States and the United Kingdom] .

I have taken the trouble to read the Ivory Bill and the Committee minutes with great care. I fear that the committee has not been given enough information and was misled on several points.

The most important I feel is that no one has said that elephants lives will be saved directly by this bill. That is rightly first and foremost what we all wish to do.

Like any illegal substance one can't deny that there is some modern ivory in the United Kingdom but by comparison to ivory pre UNESCO Convention it is an extremely small amount.

What you are doing by this Bill /Act is putting in jeopardy a whole tranche of Art & Artefact, history of the largest Empire that the world has ever known, you may or may not be proud of that empire and the domination that it had but you sit in these chambers because that empire was able to withstand the forces of Germany on two occasions and Japan with help from that empire, I think we sometimes forget how close Nazi Germany was to invading the United Kingdom. I digress but not totally.

Peoples from our United Kingdom travelled extensively and brought back furniture and Art from every continent that is why the United Kingdom has such a large depository of Antiques that is also why it has a great deal of ivory. It is therefore not surprising that when we look at DEFRA's figures for export of 7000 pieces a year between 2010 and 2015, it has to be noted each piece had CITIES therefor had to be Old Ivory. These figures seem to have been distorted to look like it was new ivory that is being exported, As it has been illegal to import New raw ivory in tusk or worked form any pieces recently imported would have had to have import CITIES I do not believe that DEFRA would give a certificate but if it did it would have been in exceptional circumstances. I appreciate it may be difficult for the Border Force and other agencies to police this so on that point with limited resources I would think that even the policing on sales of old ivory will not be easy.

Regarding the point of bovine being sold on the Internet maybe a direct request to Ebay to not to use either ivory or bovine may do as much good as policing it.

On the point of policing the trade has been criticised, I know that at least one occasion when an auction house was reported. The BADA reported to the Wildlife Crime Unite small auction house in St James's London with so I understand approximately 20 modern pieces, the police visited but did not prosecute. If the police were in any doubt they should have returned to the BADA for further information. If nothing is done when reported that has hardly created the right atmosphere for further reporting particularly when small quantities are involved therefor the critic is not totally acceptable. I appreciate under the new ideas policing would be far easier when the police are not required to know if a piece is pre 1947 but I pose the question, is that the correct way to go about things.

At this stage I believe neither of the people that represented the area of the antique trade were qualified in this area Mr Browne from BAMF is more involved with the higher areas of the Art

business whereas Mr Dodgson from the BADA is as much as an office manager as anything else and does not have the expertise or experience in this field hence his silence with lack of information.

When it comes to a piece having a percentage of ivory referred to as the *de-minimis* I find this point rather extraordinary that either a piece is genuine and old or it is not therefore it should not be considered under the proposed ban.

It also seems to me that setting the high level "as the rarest and finest pieces" in the way it has been worded it is only exempting objects that can only be owned by the very rich, if this acceptable to the committee, I don't think it should be.

I have suggested in the past that it would be better to have committees vetting individual pieces, giving each piece a passport as it were, each certificate should have a photograph and a charge should be levied at 50% of that should go to wild life conservation groups. In addition to this a tax of 10% should be levied on a sale in the same way as Droit de Suite is collected [this would mean that each time a certificated piece of ivory is sold a charge would be levied]. I do not think it would be that complicated to collect this tax on a monthly or quarterly VAT forms by just adding two boxes, the first for the selling price the second for the tax. One hears that the Government wants to see the bill adopted by other countries were it to give you an example at a recent Art Fair in Europe on the first day on one stand alone 17th century ivory antique Works of Art was sold for ten million euros that would generate 1,000,000 in tax revenue.

My attitude is that the past should pay for the future, but the attitude that I hear is that the past is a dirty word and should be allowed over a period of time to disappear into the rubbish dumps of time.

We hear a great deal about teapot handles and knobs but are the Committee members aware of large numbers of Christian sculptures made in ivory from India, the Philippines, France [particularly Dieppe] Germany and Flanders. Over time you will see their iconoclasm demise by default one can see a direct reflection in Islamic State and the Taliban here. The United Kingdom is still considered a Christian Country.

Some of you may have heard of the book *The Hare with the Amber Eyes*. A story about a collection of Netsuke which begins in the 19th century continued during the 1939 -45's war and up to the present day, in itself the story is fascinating but it also reflects the story of many pieces that you are proposing to let fall on the rubbish dumps of time [if you have not read the book you would have a better understanding of what you are about to do I would take the time to read it because it reflects a very important aspect of ivory and history]

One of the other things I noted was the substitution of Narwhale and perhaps Sperm Whale tooth as a cover Elephant ivory I cant say hand on heart it is probably not impossible but I have never seen it in my whole career, In Hawaii after the islands were visited by whaling ships during the 19th century walrus tusk was some times used rather than sperm whale tooth as no doubt at the time it was easier to obtain but that does not have a reflection on today in any way.

I bring this up because putting a ban on these antique ivory pieces you would cut out large areas of what is called Ethnic Artefacts, the kind of thing that James Cook and many famous and less famous British explorers brought to these shores from the days of Enlightenment until the 20th century, many pieces still residing in houses, attics and cellars of our land, Is it right that this knowledge should be allowed to disappear?

May I also say that the Experts from the museums are put in an impossible position by the Committee and they were not asked questions about the Art History point only whether it would be possible to qualify pieces. By there very positions they are not able to give an opinion on this whole question.

Tools from the Arctic made by Inuit peoples [previously called Eskimos] are predominantly made of Narwhal and Walrus and can date back over a thousand years being preserved in the Permafrost. Equally the Islanders of Fiji, Cook Islands, The Sandwich Islands, Hawaii and the Marquesas were famous for making personal ornaments from whale tooth. I recently purchased two ear ornaments catalogued as African, but were in fact made of whale tooth from the Marquesas Islands and very possibly 18th century pre western contact. These small pieces may seem insignificant but were they to go onto the rubbish dump of history something in this area of history and knowledge would be lost, have we got to the age of Philistines, I hope not yet.

Although the purpose of this bill is very honourable it is being rushed through for the October Conference, Bad Law is hurried and Good Law is thought out and the consequences of a bad law will be disastrous to the Art History and the cultural heritage of our country and will not suffice to do the job it is intended for.

If I may say so Government and experts do not always get things right for years we were been told that we should drive cars with diesel fuel, now we are being told the contrary. This bill will lead to destruction and not serve the elephants we all wish to save.

If I may be bold enough to make some criticism, I have been looking at the ivory position for sometime somewhere in the region of two years now with growing interest and obviously growing information I have the very strong impression that there are people in the NGO's and even in DEFRA that take the position that there should be NO ivory of any type on the market for sale. As humans have used it in one form or another for stoneware in the region 3000 years I find that it is a very bias way of looking at the situation and wonder if someone with that attitude should be giving advice to the Government on this issue.

Having said that I have no qualms about either using the date of pre 1947 UNESCO Convention or possibly 1918 as the a cut off date, and possibly destroying anything post the date.

I appreciate that were The Committee & Secretary of State to reflect on these words and change in some ways the direction of the act they and he would reflect a stronger personality than just rushing through with an ill-informed Act [all be it with good intention]. I am sure that he is a man of such personality, intelligence and foresight that he may have the understanding of the importance of what I am trying to say and what is best for the elephants and the United Kingdom.

OBSERVATION



Purchased two ear ornaments catalogued as African, but were in fact made of whale tooth from the Marquesas Islands, extremely rare and of historical importance. Certainly not easy to recognise but should not be lost to the History of the United Kingdom The World and Art history.

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