

Dear Co-Chairs Senator Kennedy, Representative Albis and the esteemed members of the Environment Committee,

We the undersigned would like to express our appreciation to Senator Ted Kennedy Jr., Representative James Albis, and the Environment Committee for their efforts to address the global problem of the illegal ivory trade while protecting the artifacts of our historic past.

With Connecticut's distinguished history as an important maritime power beginning in the 18th century, historic artifacts and artworks made and used in our State include significant quantities that feature ivory as a decorative material. Examples are as wide ranging as large pieces of furniture with ivory inlay, delicate miniature portraits painted on thin disks of ivory, small ivory sculpture, flutes made by Asa Hopkins of Litchfield in the 1820s and 1830s and pianos made by Orramel Whittlesey of Salem, between 1830 and 1860.

In addition to elephant ivory, items made with marine mammal ivory would also be regulated by Connecticut's Ivory Legislation. In a state where New London whalers once sailed the globe, it is critical to include protection for this significant part of our cultural heritage. However, the inclusion of 20% or less content requirement would result in a total ban on all scrimshaw engraved whale teeth, walrus tusk and narwhal teeth. This content requirement would also exclude countless ivory sculptures of a variety of origins and ages, including many masterpieces of Medieval European sculpture. In a state with significant public and private collections these treasured works of art must be protected. The 20% or less content requirement appears arbitrary, counterintuitive and would cause the devaluation of countless genuine antiques.

The proposed dateline of 100 years or older also falls short and represents a significant obstruction to the mission of both public and private collectors. We support a bright line of February 26, 1976, the day on which the African elephant was deemed an endangered species. A constructive approach would support the long-standing legal market for antique worked ivory and keep trade out of illegal underground markets. This would reduce the opportunity for the speculation that fuels the illegal hunting and poaching in Africa.

Under HB 5578, the hearing process for those accused of a violation includes an extensive, and likely expensive, administrative appeal process, which "need not be conducted in accordance with the rules of evidence". This raises strong concerns on the ability of the accused to defend themselves and would result in an attitude of fear among law abiding citizens of Connecticut.

We the undersigned urge the Legislators of the State of Connecticut to reject the Ivory Ban legislation, HB 5578, protecting both our distinguished history and the endangered species of today.

Sincerely,

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