



IADAA NEWSLETTER FEBRUARY 2025

The World Customs Organisation 2023 Illicit Trade Report

The World Customs Organisation (WCO) finally seems to have all but given up when it comes to an accurate and detailed analysis of trafficking and the art market, if this latest report is anything to go by. Several wild claims of trafficking worth billions are not only unsupported by evidence or any reliable sources – they even contradict each other. Added to this is the WCO's insistence on the art market being a haven for money laundering while quoting reports that say the opposite. Even its most important anti-money laundering initiative, Project Tentacle, demonstrates that the art market has little to do with what is going in this sphere of crime.

Most intriguing of all is that while it claims a 15% uptick in cultural goods trafficking in 2023, it produces no statistics whatsoever to demonstrate this. Also, unusually, no graphs, graphics or tables are included to demonstrate the problem despite many appearing for every other risk category covered in the 250-page plus report.

When it comes to cultural goods, the report is almost a data-free zone.

As the introduction on page 11 tells us, data for the 2023 WCO report comes chiefly from the Customs Enforcement Network (CEN), but this is supplemented by other sources: official government media outlets; international organisations; member surveys and open-source analysis. While these might be helpful, they also increase the risk of misinformation and propaganda. As IADAA has discovered on numerous occasions, official reports are not necessarily robust when it comes to the reliability of their data.

Seizures under Project Tentacle, carried out in partnership with Interpol and the Financial Intelligence Units across multiple countries, amounted to \$22 million worth of gemstones, currency and precious metals in 2023. The WCO details seizures in this area as follows:

Gold: 116 seizures – 266.3 kilos of gold bars, 153 gold coins and 122 pieces of jewellery

Currency: 153 seizures – US\$3.36 million



Wildlife: 1 seizure – 69 Toucans and Macaws

Trade-Based Money Laundering: 1 case connected to high-duty consumer goods and alcohol

Watches: 29 including 4 Rolexes

Meanwhile, Ukraine understandably dominates reporting when it comes to Cultural Goods trafficking.

Of all the statistics published, the WCO's priority list is perhaps the most interesting. It categorises each of the 11 risk categories for its priority status among WCO members: Essential, High, Moderate, Neutral, Somewhat, Low and Not a Priority. It presents an average priority score for each category, the highest being 5.06 for drugs, and the lowest 3.41 for Cultural Goods.

Despite this, the WCO claims that the annual global value of trafficked Cultural Goods is in the tens of billions of euros. It gives no source for this but seems to be confusing the figure with the value of the legitimate global art market in 2023, which it puts at \$65 billion, using the Art Basel Report as a source.

The tens of billions claim also clashes with another claim, which reiterates the long debunked figure of \$6 billion reported in the 2016 UNODC report as the value of the global "underground market" in Cultural Goods.

"As we will see below, the market has naturally attracted criminals, organized crime groups, and terrorists who seek to launder proceeds of crime and fund their activities," the introduction to this section states – a claim not held up by what follows at all, especially as it immediately excuses the "low figures" for seized Cultural Goods as under reporting by WCO members as they have other priorities. The report says that although reported seizures of Cultural Goods are low, they have been "consistently trending upwards since 2019", with a 15% increase year on year in 2023. What the actual figures are, we are not told.

The WCO quotes the IMF and the Financial Action Task Force (FATF February 2023 report) in damning the art market as a higher risk sector for money laundering than other sectors, even though studies such as the US Treasury Report of 2022 concluded it to be lower risk. The FATF report, a seriously flawed and heavily redacted piece of work, largely used case studies that, while involving art, did not involve the art market. In fact, the FATF report acknowledged that the art market was not attractive to money launderers, is regulated by AML laws as well as self-imposed compliance and "In addition, a large part of the transactions carried out in the sector are routed through the banking system, which generally has mature and long-standing AML/CFT controls."

The WCO ramps up the rhetoric against the art market by quoting the case of Lebanon-based Nazem Said Ahmad, a man with suspected linked to Hezbollah, whose property was seized from storage near Heathrow in London in 2019 and became the subject of a major investigation. The WCO puts a value of \$160 million on the seizures although the figure reported at the time was \$1.3 million. How much this case had to do with the art market is unclear. Certainly at least one auction house, Phillips, was involved, but had frozen Ahmad's artworks and banned him from doing business with them in 2019. The WCO does not name the nine co-conspirators who were charged in 2023, nor whether any of them were part of the art market.

In none of the limited number of cases of Cultural Goods trafficked from Ukraine mentioned in this report does the WCO mention any links to the art market.

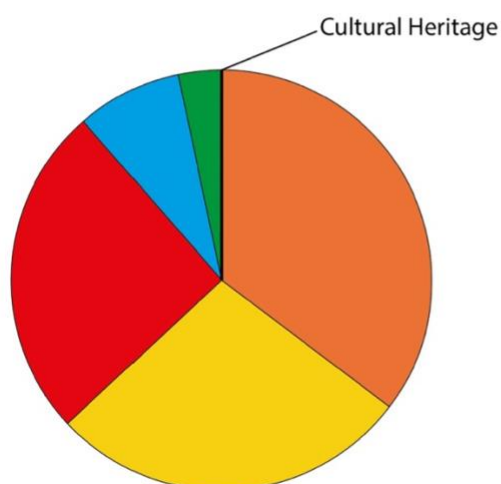
This report comes across as little more than a piece of anti-market propaganda. The failure to publish any hard statistics other than those that are wrong or have no source displays a degree of cynicism, while conflicting bogus claims as to the size of trafficking – \$6 billion or tens of billions of dollars – show a lack of care or incompetence that simply undermines the WCO's credibility.

Yet again, we are faced with an authority that appears to have a pre-set political agenda when it comes to the art market, making claims it cannot support with

evidence, then acknowledging that the evidence isn't there, then excusing this shortcoming by blaming 'under reporting'. As figures from previous years have shown – and the pie charts of 2019 figures here demonstrate – by a very long way Cultural Goods make up the smallest contribution to trafficking by every measure. This is not just true for the number of cases and seizures, but also for the volume and value of items seized of any risk category. In the decade or so since such figures have been reported, this has always been the case, and this fact is supported by every other study published into the subject.

We have written to the WCO asking for the source of its figures and challenging its position on cultural goods, and received a response just before going to press with the newsletter informing us that the officer in charge of drafting this section of the illicit trade report no longer works for the WCO. The other points raised have been forwarded to the team in charge of the next Report. That team has also confirmed that no data from the CEN can be shared with external shareholders – so we just have to take their word for it. This contradicts their publication of such figures in earlier reports. We have now asked them, once more, to confirm the source of their figures and to provide evidence of the 15% uplift claimed.

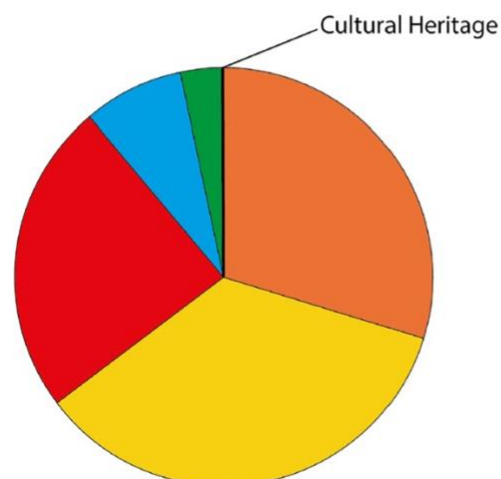
Share of cases by risk category



Number of cases	
Total:	102,214
Drugs:	36,264 (35.48%)
IPR + H&S:	28,203 (27.59%)
Revenue:	26,285 (26.72%)
Security:	8,190 (8.01%)
Environment:	3,045 (2.98%)
Cultural Heritage:	227 (0.22%)

Drugs	—
IPR + H&S	—
Revenue	—
Security	—
Environment	—
Cultural Heritage	—

Share of seizures by risk category



Number of seizures	
Total:	133,453
Drugs:	40,017 (29.98%)
IPR + H&S:	46,386 (34.76%)
Revenue:	32,426 (24.30%)
Security:	10,469 (7.84%)
Environment:	3,884 (2.91%)
Cultural Heritage:	271 (0.20%)

Above: Figures from the WCO 2019 Illicit Trade report

Online Artifacts Auction Bust: A Suspenseful Tale of Antiquities Trafficking

Devdiscourse: January 31: News that a woman has been arrested in Athens after attempting to sell looted antiquities online. The foreign nationals is said to have been “orchestrating online auctions to sell ancient Greek artifacts internationally, including to the United States, Britain, Canada, Australia, and Italy”.

Egyptologists raise ‘mismanagement’ concerns after worker seen hammering at Great Pyramid of Giza

Art Newspaper: February 3: “A video apparently showing a worker using a hammer and chisel to chip at the stones of the Great Pyramid of Giza, a Unesco World Heritage site and only remaining Wonder of the Ancient World, has sparked outrage,” this article reports.

The video came to light in November and the debate surrounding its emergence has now reached the Egyptian parliament.

It is the latest controversy to attract criticism from Egyptologists such as Monica Hanna, who also cited the project to restore ancient cladding on the pyramid of Menkaure, a project cancelled last year after causing an outcry.

The Art Newspaper notes the competing interest of historic preservation and the tourist dollar: “As the government forges ahead with an ambitious programme of development and infrastructure building, the balance between attracting tourist dollars crucial to the economy and safeguarding historic sites is more delicate than ever. Infrastructure projects include a new high-speed rail line under construction from the north of the country to Aswan that will cut through important sites like Abydos, as well as a highway that will impact the pyramids at Dahshur, another Unesco World Heritage site.”

Benin and Beyond

History Reclaimed: February 4: As an increasing number of [articles continue to ignore the context of the Benin bronzes](#) in arguing for their return, historian David Abulafia redresses the balance by reminding us of what might prove uncomfortable truths for some.

Particularly in Abulafia’s sights here is Dan Hicks, curator of the Pitt-Rivers museum in Oxford and author of *The Brutish Museums: The Benin Bronzes, Colonial Violence and Cultural Restitution*. Hicks, a high profile academic much covered by the media, presents the Kingdom of Benin as pure victim and the British and the West in general as entirely at fault in this controversy, centring on the 1897 punitive mission and seizure of the bronzes.

Complicating the narrative now is news that one of Hicks champions, Swedish academic Staffan Lundén – whom Hicks thanks in his acknowledgements for the book – has attacked Hicks and his efforts.

Abulafia highlights the critique: “Lundén says: ‘The Brutish Museums has all the outward characteristics of being a well-researched and solid academic work, but a closer look reveals that it is not. The numerous errors and systematic misreading of sources resulting in wholly unsubstantiated claims about British violence and Edo casualties call its status as a scholarly work into question.’”

Hicks is not guilty of mischievously trying to rewrite history, says Abulafia, but “he is guilty of the fault that far too many historians make: of deciding what he wants to demonstrate before mastering the data, for it is on evidence alone that conclusions can be built.”

As subscribers will know, anti-trade rhetoric and research is awash with bogus statistics that are often promoted as a result of confirmation bias. Academics and others finding ‘evidence’ that supports their view often do not check its rigour and so fall into the trap of promoting propaganda rather than fact.

Abulafia notes the collusion of the Church of England in airbrushing inconvenient facts: “Hicks emphasises colonial violence while the mass enslavement and large-scale human sacrifice practised by the Oba, or king, in his palace in Benin is quickly dismissed. Following the suppression of the slave trade by the British navy, the transatlantic market for slaves shrank, and surplus captives from the Oba’s wars were put to death in gruesome, bloody rituals. British suppression of these acts was conveniently ignored when St Paul’s Cathedral, advised by Hicks, proudly placed a memorial to the Oba by the Nigerian artist Victor Ehikhamenor in the crypt.” In the case of the bronzes, the Nigerian government’s decision to hand them over to the current Oba – direct descendant of one of history’s most bloodthirsty slave traders – complicates matters further, as does the US courts’ decision to dismiss the views of the descendants of those sold into slavery by the Oba. There is some hope, however: “Amid all this confusion, it feels like the tide might be turning on the case for restitution. There is an intellectual danger too: that by returning objects, they lose their power to speak to the wider public about the civilisations from which they hail.” Despite the political onslaught, the great museums have been admirably resistant to being denuded, argues Abulafia, who goes on to challenge accepted thought on restitution and other matters.

Archaeologists Unearth London’s First Roman Basilica in ‘Amazing’ Discovery

Artnet: February 14: Archaeologists have unearthed what appears to be one of the most important Roman finds ever discovered in London. The remains of the city’s first basilica came to light during work to demolish an office building.

Part of a wall has been dated to 70-80AD.

“The forum housing the basilica is believed to have been located on a high point in the city to emphasize the government’s power and authority. Spanning the size of a soccer field, it served as a venue for administration and commerce and housed a courtyard that hosted community activities, it has been reported.

Cleveland Museum of Art will return looted Greco-Roman bronze to Turkey

Art Newspaper: February 17: News that the Cleveland Museum of Art has dropped its legal action against the Manhattan District Attorney’s office over an ancient headless bronze sculpture and agreed to return it to Turkey.

This was a high-profile case being watched with interest because it was a rare instance of an institution refusing to give in to the Manhattan DA’s Antiquities Trafficking Unit’s attempts to seize an item and return it to the country of origin. Subscribers will know that while objects that have indisputably been trafficked have been seized and returned in this way, many other items have been seized controversially, while their status as illicit has never been clearly or otherwise demonstrated. The unit, under the command of Assistant DA Matthew Bogdanos has proved highly controversial and has been openly accused of overreach in its activities, apparently driven by political rather than legal considerations.

Initially the Cleveland Museum resisted the approach of the unit because, as its director, William Griswold is quoted as saying, the DA’s claim and evidence “was not utterly persuasive”. The change of heart has come following scientific tests that were reported as having found a match between the statue and the site in Bubon, Turkey, where the statue was thought to have come from decades ago.

Meanwhile, according to Artnet News, the Metropolitan Museum of Art in New York is returning the bronze head of a griffin to Greece. Dating to the seventh century, it was originally acquired from an Athens dealer in 1936 and then sold in 1948 by the Joseph Brummer Gallery to Walter C. Baker who bequeathed it to the Met in 1972, where it has been on display ever since.

According to Artnet News, “The Greek ministry of culture provided a report detailing how the piece was found in the Kaledios riverbed in the small Greek town of Olympia in 1914 by the curator of the local archaeological museum. It was stored in the museum’s library but was not properly recorded before its disappearance in the 1930s, though surviving documentation reviewed by the Greek ministry and the Met showed it could not have left legitimately.”

This is the first repatriation made under the appointment last year of former Sotheby’s specialist Lucien Simmons as head of an expanded provenance research team.

Archaeologists may have found pharaoh’s second tomb

BBC News: February 23: A joint team of British and Egyptian archaeologists believe that they have found the second tomb of Pharaoh Thutmose II (c.1493-1479BC) days after finding the first one empty – the first royal tomb discovery since that of Tutankhamun in 1922.

If so, it will be the last missing tomb of the kings of the Eighteenth Dynasty. The tombs have proved so elusive because they were not found where expected in the Valley of the Kings but in the Western valleys near Luxor.

What is thought to be the mummy of Thutmose II has been on display in the National Museum of Egyptian Civilization for years. It is thought that it was removed from the first tomb only six years after interment when the tomb flooded.

However, a competing theory is that the mummy is not that of Thutmose, and the archaeologists are hopeful that they may find the king in the second tomb.

The first discovery was initially thought to have been the tomb of a royal woman as it was found in the area where they were traditionally buried, but decoration found within – a blue-painted ceiling with yellow stars (as illustrated *below* courtesy of the Ministry of Tourism and Antiquities) – was only used for the pharaoh.

Thutmose II was the husband of Queen Hatshepsut, one of the very few female pharaohs.



Ancient Coin Collectors Guild back reintroduced Bill in support of collectors

ACCG: A reintroduced Bill introduced in Congress aims to facilitate the lawful trade in collectors’ coins.

“Ever increasing numbers of overlapping import restrictions on common collectors’ coins have made the legislation necessary,” reports the ACCG. “For twenty-five years after the Cultural Property Implementation Act (CPIA) was passed, there were no import restrictions on ancient coins. This should be no surprise because it is hard to link coins—which by their very nature are instruments of exchange—to one modern nation state. Indeed, when the CPIA was being negotiated, Mark Feldman, one of the State Department’s top lawyers, assured Congress that “it would be hard to imagine a case” where coins would be restricted.”

That changed in 2007 when the State department imposed restrictions on the trade in Cypriot coins and “the misled the public and Congress about it in official government reports”.

Other restrictions have been applied since covering more than 20 countries statutory limitations. Provenance issues arise with coins at least as often as with antiquities because of the lack of documentation, which no one would have expected to accompany them in the first place but is now demanded.

The ACCG is seeking co-sponsors for the Bill. Read more about its efforts via the [embedded link](#).