

Six proposals have been submitted with respect to African Elephants (*Loxodonta africana*)

Prop. 12.6 (Botswana): Amend Annotation 604 for the elephant population of Botswana to allow:

a) trade in hunting trophies for non-commercial purposes; b) trade in live animals for commercial purposes to appropriate and acceptable destinations (and as determined by the national legislation of the country of import); c) trade in registered stocks of raw ivory (whole tusks and pieces) of Botswana origin owned by the Government of Botswana for commercial purposes only to CITES approved trading partners who will not re-export ivory. No international trade in ivory to be permitted until 18 months after the adoption of the proposal (May 2004). Thereafter an initial amount of not more than 20,000 kg of ivory may be traded, followed by annual export quotas of not more than 4,000 kg from the year 2005 onward; d) trade in hides; e) trade in leather goods for non-commercial purposes; and f) trade in ivory carvings for non-commercial purposes.

Prop. 12.7 (Namibia): Amend Annotation 604 for the elephant population of Namibia to allow:

a) trade in hunting trophies for non-commercial purposes; b) trade in live animals for non-commercial purposes to appropriate and acceptable destinations (as determined by the national legislation of the country of import); c) trade in hides; d) trade in leather goods and ivory carvings for non-commercial purposes; and e) trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin owned by the Government of the Republic of Namibia to trading partners that have been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory will not be re-exported and will be managed according to all requirements of Resolution Conf. 10.10 (Rev.) concerning domestic manufacturing and trade. No international trade in ivory to be permitted until 18 months after the adoption of the proposal (May 2004). Thereafter, an initial amount of not more than 10,000 kg of ivory may be traded, followed by annual export quotas of not more than 2,000 kg of ivory, from the year 2005 onwards.

Prop. 12.8 (South Africa): Amend Annotation 604 for the elephant population of South Africa to allow:

a) trade in hunting trophies for non-commercial purposes; b) trade in live animals for re-introduction purposes into protected areas formally proclaimed in terms of the legislation of the importing country; c) trade in hides and leather goods; d) trade in Government-owned stocks of raw ivory (whole tusks of any size, and cut pieces at least 20 cm in length and one kilogram in weight) originating from the Kruger National Park. An initial stockpile of 30,000 kg is proposed and a subsequent annual quota of 2,000 kg accumulated each year through annual mortalities and management practices. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

Prop 12.9. (Zambia): population transfer from Appendix I to Appendix II to allow:

a) trade in raw ivory under a quota of 17,000 kg of whole tusks owned by Zambia Wildlife Authority (ZAWA) and obtained from management operations; and b) live sales under special circumstances.

Prop 12.10. (Zimbabwe): Amend Annotation 604 for the elephant population of Zimbabwe to allow:

a) trade for commercial purposes in registered stocks of raw ivory (whole tusks and pieces) of Zimbabwean origin owned by the Government of the Republic of Zimbabwe, to trading partners that have been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory will not be re-exported and will be managed according to all requirements of Resolution Conf. 10.10 (Rev.) concerning domestic manufacturing and trade. No international trade in ivory to be permitted until 18 months after the adoption of the proposal (May 2004). Thereafter, an initial one-off quota of not more than 10,000 kg of ivory may be traded, and a subsequent annual quota of not more than 5,000 kg of ivory; b) trade in hunting trophies for non-commercial purposes; c) trade in live animals for non-commercial purposes to appropriate and acceptable destinations; d) trade in hides and leather goods; and e) trade in ivory carvings for non-commercial purposes.

Prop. 12.11 (Kenya and India) List all African elephant populations in Appendix I.

SSN VIEW: Support Adoption of Proposal 12.11 and Oppose Adoption of Proposals 12.6, 12.7, 12.8, 12.9, and 12.10

- African and Asian elephants remain at serious risk from ivory poaching.
- A minimum of 1059 African elephants are reported to have been poached for their ivory¹ between January 2000 and June 2002, but field reports indicate that the figure is significantly higher.
- A minimum of 14,648 worked ivory pieces, 2,563 ivory tusks and 6.2 tonnes of raw ivory are reported to have been seized between January 2000 and June 2002.

- In addition, in July 2002, it was reported that a single shipment of 6 tonnes of ivory that originated in Zambia, destined for Japan, was seized in Singapore, after arriving by ship via South Africa.
- The system for Monitoring the Illegal Killing of Elephants (MIKE) will be unable to provide any meaningful data for COP12, as reported at a MIKE meeting in May 2002.
- MIKE is unable to definitively identify the cause(s) of any changes in elephant poaching trends.
- MIKE does not have baseline data from the period prior to COP10 (1997) that can be used to make comparisons between elephant poaching trends before and after some populations of African elephants were transferred to Appendix II and the subsequent ivory auctions.
- Ivory from legal and illegal sources cannot be distinguished from one another.
- Potential importing countries are unlikely to have sufficient trade controls in place to prevent the illegal importation of ivory.
- Few, if any, African or Asian elephant Range States have sufficient enforcement capacity to prevent the export of illegal ivory shipments or sufficient resources to ensure that resumed trade in elephant products does not negatively affect elephant populations.
- The wide-ranging nature of these proposals is tantamount to a *permanent re-opening of trade* in elephant products from these countries. It is highly unlikely that the CITES Secretariat has the resources to inspect and monitor future ivory auctions at the same level as was undertaken in 1999.
- Recent reports show that the retail ivory trade in many South- and South-east Asian nations is very significant, and that large amounts of ivory are being imported illegally into the EU and the USA by tourists. Most of the ivory illegally imported into Thailand comes from Africa.
- Further legalised ivory trade is likely to confuse consumers even more and to encourage them to believe that all international ivory trade is now legal.

BACKGROUND

Following a 50% reduction in African elephant populations between 1979 and 1989 — mainly as a result of poaching for the ivory trade — the Parties to CITES COP7 (1989) listed the African elephant on Appendix I. Since then, there have been proposals to transfer certain African elephant populations to Appendix II or to trade ivory internationally at every COP.

In 1997 (COP10), the Parties agreed to allow the transfer to Appendix II of the elephant populations of Botswana, Namibia and Zimbabwe, and a subsequent auction of raw ivory to buyers from Japan. The adoption of these proposals was supported by a commitment to establish a monitoring system capable of detecting any negative impacts of the downlistings and trade.

In 2000 (COP11), the elephant population of South Africa was transferred to Appendix II, but no further ivory trade was agreed. Further proposals for ivory trade from Botswana, Namibia and Zimbabwe were withdrawn.

CURRENT THREATS TO ELEPHANTS

It has become clear that elephant poaching remains a serious threat to elephants. Reports indicate that very large numbers of elephants are being poached for their ivory¹ both in Africa and in Asia.

Between January 2000 and June 2002, reports — mainly from the global media — indicate that 1,059 African and 39 Asian elephants have been poached for their ivory¹, while 14,648 worked ivory pieces, 2,563 ivory tusks and 6.2 tonnes of raw ivory are reported to have been seized during that period. Noting that most of this information on poaching and illegal trade originated from press articles, it is inevitable that many more such incidents have gone unreported. For example, anecdotal reports indicate that 200 elephants were poached in the Central African Republic last year and that this year's total for CAR currently stands at approximately 30. The Government of Zimbabwe has recently admitted that poaching is "rampant" in the re-settled areas, and that 78 elephants were poached during 2000 and 2001, although this was not mentioned in their proposal. As the situation worsens in Zimbabwe and the number of areas where conservationists are excluded increases, accurate elephant poaching figures for 2002 are almost impossible to obtain.

In addition, large numbers of Zambian elephants have been poached in recent years. A report by USAID in December 2000 indicated that between January and September 2000, 156 elephants had been poached in a survey area covering parts of Kafue National Park Central, Mumbwa GMA West and Namwala GMA West. The report surmised that, since the survey area was only a part of the entire range, many more elephants were likely to have been killed. A report by the Zambian Wildlife Resource Monitoring Unit estimated that the elephant population of Kafue National Park had fallen from 4,500 in 1996 to fewer than 2,000 in the year 2000.

In July 2002, it was reported that a single shipment of 6 tonnes of ivory that had originated in Zambia was seized in Singapore. The Lusaka Task Force, which investigated the incident, stated that the ivory was moved from Zambia to Malawi and from there to South Africa for shipment. The final destination was Japan.

A recent report by Martin and Stiles² revealed that, across eight Asian countries, over 105,000 pieces of ivory were found to be on sale, and that significant quantities of ivory in Thailand had been imported from Africa. European tourists — mainly from Germany, France and Italy — were the most frequent buyers. Reports have shown that tourists are also buying significant quantities of ivory in African countries. Clearly, a major consumer re-education programme, such as that carried out in the 1980s, is urgently required in Europe. This task will be made far more difficult in the face of a legal ivory trade from certain countries, particularly since some of the proponents are now requesting that they be allowed to export unlimited amounts of ivory for "non-commercial purposes", such as jewellery and carvings, which are the mainstay of the tourist market.

Furthermore, the current proposals are not solely for a "one-off" sale, as they were in 1997, but for ongoing annual quotas. Allowing a permanent legal supply will cause a dangerous shift in the attitudes of illegal ivory traders and poachers. Although the proposals are nominally restricted to five countries, it is highly likely that, in the eyes of the criminal fraternity, as well as ivory consumers, they will be

seen as tantamount to a general – and permanent - re-opening of the international ivory trade. Even now enforcement controls in most Range States are inadequate to prevent poaching and illegal trade and they cannot meet increased enforcement costs resulting from ivory trade. Two of the countries proposing trade in ivory (Zimbabwe and South Africa) have been widely criticised for their inability to control poaching or illegal wildlife trade. Furthermore, South Africa has thus far failed to adopt national legislation to implement CITES as required in Resolution Conf. 11.18.

THE “EXPERIMENT” WITH NO RESULTS

Many key questions remain unanswered regarding the decisions made at COP10:

The ivory auctions following the 1997 transfer of the elephant populations of Botswana, Namibia and Zimbabwe to Appendix II were described as an “experimental” sale. The understanding at that time was that the Monitoring of the Illegal Killing of Elephants (MIKE) program would provide the Parties with a means by which to assess the effects on elephant poaching levels of this experiment. It has since transpired - most recently at the May 29th 2002 meeting of the MIKE Technical Advisory Group - that there will be no meaningful data from MIKE for COP12 and that there are, in any case, insufficient baseline data from the period prior to COP10 with which to make comparisons between the poaching situation before and after the COP10 decisions were implemented. In effect, this means that the mandate of MIKE – to assess the impacts of the decisions taken at COP10 – will never be fulfilled. In addition, it was admitted that MIKE will not be able to provide definitive proof regarding the effects of CITES listings on elephant poaching trends.

At the 18th meeting of the CITES Animals Committee (8th-12th April 2002) it was noted that MIKE is not operating as intended and that “national implementation of MIKE still ranges from total non-compliance to serious commitment” (AC 18 Doc. 5.1 (Rev.1) African Regional Report). With regards to the Elephant Trade Information System (ETIS) the African Regional Report also notes that only three African countries (Cameroon, Egypt, Namibia) have submitted official data and that “overall, the region is failing to respond adequately” which is “especially worrying for countries with significant elephant populations, ongoing ivory seizures and accumulating stockpiles, which may themselves serve as sources of illegal ivory”.

Furthermore, there have been no official reports on the “benefits” to elephant conservation resulting from the funds generated by the ivory auctions, which was one of the principal justifications for the COP10 downlisting and ivory trade proposals. Although the Secretariat, in Doc. 11.31.1, gave details of proposed conservation expenditures using revenues from the ivory sales, there has been no follow-up documentation providing a breakdown of the funds raised by each country, or of the uses to which the funds have been put. Neither has there been any explanation of how the claimed benefits to elephant conservation were measured.

With regard to the decisions taken at COP10, the Parties are therefore in a position of having carried out an “experiment” with no way of ascertaining the results.

For all these reasons, we believe that it would be premature and harmful to wild elephant populations for CITES to permit any further trade in ivory or other elephant products, or to downlist any further elephant populations.

¹ This does not include elephants shot on problem animal control or elephants killed in human-elephant conflict

² *The South and South East Asian Ivory Markets*, Esmond Martin and Daniel Stiles; London, 2002