



SSN comments on SC54 Doc. 26. (Rev.1) on MIKE Baseline Information

SSN concludes that the baseline information – as defined at SC49 and clarified at SC53 - is not complete. Therefore, no decision on ivory sales can be taken at SC 54.

Doc. 26.2 raises several questions concerning the quality, integrity and usefulness of the baseline data presented:

- Clearly, the MIKE baseline data are not yet complete (Annex 2, Status of sites). The geographical scope of the baseline information required before stockpile sales can be approved covers Africa and Asia (SC49 Doc. 11.2 (Rev. 1)). However, instead of the 18 Asian sites agreed at SC53, the baseline is reported achieved (all parameters “green”) for only 12 sites (67%). Of the 45 sites agreed for Africa, the baseline is reported achieved (all parameters “green”) for only 39 (87%). “Possible alternate” sites - 6 for Africa and one for Asia - have been presented. If these are included the total number of “green” sites for Africa comes to 45. However, the original proposal for establishing MIKE (Doc. SC41.6.3 Annex), which provides the basis for the agreed sites, states “it should be noted that taking one of these alternative sites may disturb the overall balance of the sample” (emphasis added). These “possible alternate” sites should therefore not be included in the baseline information. If taking just one alternate site could disturb the balance, what will the inclusion of seven do?
- Excluding possible alternate sites, only 51 out of the total 63 sites (81%) are reported as “green”. Even including possible alternates, only 58 (92%) are reported as “green”. **Thus, the baseline information required has not yet been delivered.**
- The selection of MIKE sites is **strongly biased towards protected areas**. All but 4 of the 47 African MIKE sites for which levels of illegal killing are reported appear to be areas managed for wildlife conservation (protected areas). Much of the range of the species outside protected areas is excluded; therefore the MIKE results cannot be considered representative for elephants throughout their range.
- The data presented originate from different time periods between January 2000 and August 2006 (Table A3.1.1). Meanwhile, population estimates have been collected by 8 different methods (aerial sample count, aerial total count, line transect dung count, individual recognition, ground total count, genetic dung count, ground sample count and informed estimate). **Thus the data from different sites are not equivalent and cannot be properly compared.**
- **For 18 (38%) sites in Africa data coverage is only up to 2004 at the latest** and data from three of these sites are only up to 2003. (Table A3.1.1). The data from Namibia - which wants to sell its stockpile and which received CITES approval for non-commercial sales of “ekipas” in November 2004 -- only goes up to 2004. It is possible that the baseline has changed since then, particularly considering the large seizures, indicating increased poaching, that have been made in the last two years. It should be noted that for 14 African and three Asian sites the population surveys presented were conducted over three years ago (Table A3.2.2). This would have disqualified them from the baseline data before the “clarification” - proposed by the CCU – was agreed at SC53 that population surveys dating back to 2000 could be used.
- In the data analysis, up to **six different scores of 29 “influencing factors”** are attributed to each site. It is not comprehensible from the document how variables have been applied and processed; the data as presented are almost impossible to interpret. SSN is further concerned that this process lacks objectivity. CITES decisions (Variable 30) have been omitted as an

influencing factor as no data were said to be “currently available”. The CCU states that it would be “cumbersome” to include a descriptive report on influencing factors for each site, but given the potential effects on elephants of the decision to be made on the basis of this data – whether to allow stockpile sales – ignoring such an important consideration and cutting corners in this way is not justifiable.

- The data on illegal killings in Zambia are lower than those published in the proposal to downlist Zambia’s elephant population presented at CoP12 in 2002.
- The **assumptions on which the analysis is based on are debatable** and should not be accepted without question. We specifically question assumptions that: 1) it is always possible to distinguish whether a carcass results from illegal killing or other mortality; and 2) the probability of detection of a carcass remains constant within a site. SSN notes that, even with these questionable assumptions, the report acknowledges that the levels of illegal killing (Table A3.6.1) are “subject to considerable uncertainty”, borne out by the wide confidence limits for most of the sites.
- SSN is concerned that the MIKE report hypothesizes that an increase or decrease in illegal killing can be ascribed to certain causal factors. The Standing Committee should take a precautionary approach in this respect, noting the general acknowledgement that **a causal link between CITES decisions and illegal activity cannot be proven**.
- **The total number of carcasses counted by MIKE over nearly 6 years is 2,343** (bearing in mind that sites began data delivery in different years). The SSN seizure database records 28,961 kg of ivory and 360 tusks seized since just December 2004. Using an average tusk size of 3.45kg (Hunter, Martin and Milliken, 2004) and 1.8 tusks per elephant, seized ivory alone over less than 2 years equates to 4,863 dead elephants. If a 10% seizure rate is assumed, **a total of more than 48,000 could have been illegally killed in less than 2 years**. This begs the question whether the MIKE process with all its problems (as identified in this paper) is portraying a true picture of the levels of illegal killing of elephants.

Lack of Oversight by the Subgroup and TAG

- SSN is concerned that the MIKE-ETIS Subgroup (which is tasked with overseeing, on behalf of the Standing Committee, further development, refinement and implementation of MIKE) has not been involved in recent financial and administrative decisions.
- We understand that neither the Subgroup, nor the TAG (Technical Advisory Group) nor the range States involved were consulted on the full baseline report before its publication.

Other concerns

- SSN is concerned about the **long term economic sustainability** / viability of MIKE, given the considerable budgetary requirements and gaps in funding that occurred in the past. (Several million US\$ have been spent on MIKE so far, resulting in incomplete baseline data of questionable use.) At SC53 continuation of MIKE was enabled only through an advance from the CITES Trust Fund up to a maximum of US\$199,000, designed to keep the process on track, while the Secretariat secured further external funding. This “bridging fund” was controversial, particularly given the increasing financial constraints faced by CITES. It should be noted that all efforts are supposed to have been made to repay the Trust Fund by SC54, however 74,000 US\$ have not been reimbursed.
- The European Commission has pledged to support MIKE with a further 10 million EUR until 2011. However, long term funding has not been secured for Africa and the funding for the MIKE programme in Asia is expected to finish by the end of 2006. **This could lead to the burden of implementation falling on the involved range States**.
- Failure to address the issue of longterm funding could lead to the partial or even total collapse of MIKE after just 10 years of activity and after expenditure of many millions of dollars.