

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

Seventh Meeting of the Conference of the Parties

Lausanne (Switzerland), 9 to 20 October 1989

Consideration of Proposals for Amendment of Appendices I and II

Other Proposals

ELEPHANTS AND IVORY TRADE IN SOUTHERN AFRICA

This document is submitted by Zimbabwe on behalf of several Southern African states.

1. INTRODUCTION

- 1.1 The African elephant has assumed the role of a flagship species for wildlife conservation in Africa. In any discussion of elephant conservation it is important to bear in mind the wider implications that this status carries and it is, therefore, critically important that decisions made on this issue by the international CITES forum should be constructive rather than destructive.
- 1.2 On 1 June 1989, IUCN and WWF made public announcements demanding an immediate ban on the ivory trade. In addition, seven CITES Parties have submitted proposals to transfer the African elephant from Appendix II to Appendix I. These moves were made with virtually no consultation with the majority of the range states involved. Furthermore, several CITES Parties established ivory trade bans without consultation with the range states, thus disregarding Resolution Conf. 6.7 (Interpretation of Article XIV, paragraph 1, of the Convention). These issues were discussed at the second meeting of the African Elephant Working Group (held in Botswana in July 1989), at which meeting the apparent basis for the above-mentioned actions was presented in the form of a report from the Ivory Trade Review Group. Much of the substance of that report and its conclusions are contested.
- 1.3 The aims of this document are:
 - i) to present an objective assessment of the situation;
 - ii) to support the retention in Appendix II of at least the elephant populations of Southern Africa; and
 - iii) to describe the system that is being established by the Southern African states to market their ivory and control its trade.

It must be emphasized that the Southern African states involved would be pleased to receive the approval of the Conference of the Parties for adopting this system, but that such approval is not a requirement for the establishment of the system. Constructive comments on the controls will be welcomed, but no major changes are possible at this stage since the governments involved have agreed to adopt the system as it stands.

2. AFRICA'S ELEPHANT POPULATIONS

- 2.1 Despite statements from various agencies to the contrary, there is little or no evidence to support the claim that the African elephant is threatened with extinction. The Vice-Chairman (Southern Africa) of the IUCN/SSC/African Elephant and Rhino Specialist Group has argued this in a formal review of the proposals to list the species in Appendix I. It is very clear that in some countries/regions the populations are currently secure and/or increasing, in others they are declining and in yet others there is insufficient evidence to judge the situation accurately. It is most disturbing to observe that population "estimates" that are no more than guesses are used as the basis for pronouncements on the elephant's status. It is even more disturbing to discover that the figures used have been manipulated to exaggerate claims and to mislead public opinion.
- 2.2 It cannot be disputed that elephant populations have undergone serious declines in some areas. This cannot logically be used to propose that the species is threatened with extinction when there is equally no dispute that other areas have increasing populations.
- 2.3 The continental population of the African elephant does not qualify for inclusion in Appendix I of CITES. Whether certain geographically separate populations might qualify is another matter.

3. CITES IVORY TRADE CONTROLS

- 3.1 It has been claimed that the CITES ivory trade controls have failed. These claims are at variance with the evidence. The objectives of CITES controls were to reduce the volume of trade and provide information on the volume, patterns and nature of the trade. Both these objectives have been at least partially met.
- 3.2 There has been an apparently consistent and substantial decline in the volume of raw ivory leaving Africa in recent years. Since there are elephant populations that are stable and increasing, and others that are not declining rapidly, this suggests that the CITES controls have begun to have an effect.
- 3.3 Whilst accepting that uncritical use of mean tusk weight data is dangerous and can be misleading, it should be noted that the CITES mean tusk weight data show substantial increases over the last two years (1986 = 4.54 kg, 1987 = 4.86 kg, 1988 = 5.89 kg).
- 3.4 Significant amounts of the trade data used by ITRG have been provided through the CITES control system. To make extensive use of such data and to then claim that CITES has failed to monitor the trade is misleading.
- 3.5 One certain effect that CITES controls have had is that a large proportion of the illegal trade has been diverted through non-Party states. Thus, importing Parties' controls on raw ivory must have been effective. CITES cannot be said to have failed by not controlling trade in non-CITES countries. This problem is best approached through increased enforcement in exporting countries.

4. OTHER FACTORS TO CONSIDER

- 4.1 The vast majority of extant ivory (perhaps in excess of 95%) qualifies for the pre-Convention exemption since it was acquired prior to 1976. Under CITES, this may still be traded commercially, even with the species in Appendix I.
- 4.2 Appendix I hunting trophies may also be legitimately exported, imported and re-exported under CITES.
- 4.3 The elephant population of Africa will continue to produce several hundreds of tonnes of ivory, much of which will continue to enter trade, perhaps mainly with non-Party states.
- 4.4 CITES history suggests that it would be virtually impossible to transfer populations back into Appendix II once they are in Appendix I.
- 4.5 If ivory exports are prohibited, the loss of revenue to African countries would be significant and would not be limited to the loss through inability to sell ivory alone.
- 4.6 The policy of imposing trade bans has been demonstrated to fail in other similar instances (e.g., ivory trade bans, rhino horn trade bans), and to follow such an approach now is to attempt to impose failed systems on countries which are currently engaged in successful alternatives.
- 4.7 The entry of reservations, which would be inevitable if the species is transferred to Appendix I, will have a negative effect on CITES in general.

5. THE SOUTHERN AFRICAN IVORY MARKETING AND CONTROL SYSTEM

PREAMBLE

The approach described in this system has been initiated by several SADCC countries. It adopts a regional (Southern African) approach to both the international marketing of raw ivory and the control of this trade. It is based on the World Conservation Strategy philosophy of sustainable utilization of wildlife resources and is supported by the economic analysis contained within the ITRG report. It has been adapted to take into account some of the findings of that report. The system is deliberately designed to permit restriction of the trade in ivory in addition to controlling it.

OBJECTIVES

The main objective is to establish a single system for marketing ivory from Southern Africa which:

- meets the requirements of CITES
- controls and limits legal trade as strictly and simply as possible
- reduces illegal trade to the lowest possible level
- complements efforts to conserve elephants in other countries and regions of Africa
- ensures that the greatest possible revenue is obtained from sustainable utilization of the resource
- will encourage participating countries to increase investment in the resource
- will ensure that control of the resource and its revenues is held locally within each country.

In addition, a long-term objective is to strengthen local manufacturing industries and increase value-added production and export.

MECHANISMS

1. Each participating country will enter into a formal, binding commitment to implement the system.
2. Elephant populations of each country will be monitored regularly. Where such monitoring is not already established, the SACIM Conservation Fund (see 7. below) may be used to initiate an appropriate programme.
3. A regional facility will be established in Gaborone, Botswana, to store and auction raw ivory. This will be known as the Southern African Centre for Ivory Marketing - SACIM. All raw ivory from each participating country, except hunting trophies and those small quantities already purchased by national manufacturing industries, will be transported in bond to SACIM.
4. SACIM will be directed by an executive Board. Each participating country's CITES Management Authority will have one voting seat on the Board. In addition, the CITES Secretariat and the CITES Standing Committee Chairman will each have one non-voting seat.
5. The Board will select and appoint an executive manager to implement its decisions and instructions. The manager will be responsible for running the facility, holding international auctions as and when directed by the Board, maintaining detailed records of all ivory (which will be open to inspection by all Board members), maintaining accurate accounts and administering the SACIM Conservation Fund under the direction of the Board.
6. Revenue from ivory sales will be paid directly to relevant wildlife authorities wherever possible, or to local communities where appropriate, in order to encourage investment in the resource.
7. SACIM will levy a surcharge (of 5% initially, but variable at the Board's discretion) to cover the costs of transporting ivory to Gaborone, the recurrent costs of the facility and any other incidental expenses (e.g., CITES Secretariat costs). Surplus funds from this surcharge will be placed in a SACIM Conservation Fund to be administered by the Board for the benefit of elephant conservation (primarily for, but not necessarily limited to the region).
8. Each participating country will prohibit the importation of all ivory and the exportation of commercial shipments of worked ivory (commercial being here defined as goods for resale). The export of commercial shipments of worked ivory may be permitted at some future date, subject to satisfactory controls being established to prevent abuse of the system through the "laundering" of illegal ivory.
9. Only whole tusks will be permitted for commercial export. A whole tusk is here defined as a tusk containing the tip of the pulp cavity.
10. The Board will establish and regularly review maximum annual ivory production limits for each country. Participating countries will not export in excess of these limits which will be based primarily on sustainable yield, but which may also take into account any need to

reduce elephant populations. Maximum annual ivory production limits will include hunting trophies, ivory consumed locally and all other national sources. (N.B. The principle behind the "quota system" is an important component of good conservation, but it is an internal matter. Therefore, countries will now work in retrospect, selling ivory whose origin/source is fully accounted for. The new "production limits" are overall biological ceilings which do not reflect management intentions. It is not expected that any country will export to the full extent of the production limit.)

11. Each participating country will register and store ivory as it is acquired and will appoint an officer to be responsible for this. Punch-die marking will be universally applied. National ivory officers will be required to account for the source of each tusk and to maintain detailed records which will be open to inspection by the Board's members.
12. Local purchasers (from within the region) will be permitted to buy tusks only when they are approved manufacturers, i.e. no private dealing in or resale of raw ivory will be permitted within the region. Such purchasing may take place prior to stocks being moved to SACIM at prices obtained at the previous auction. Each national ivory officer will transmit records of such purchases to the Executive Manager of SACIM who will conduct occasional checks. A national ceiling, set by the Board, will be imposed on internal sales. Each participating country will re-examine its procedures for controlling internal trade to ensure that it cannot be used to any significant extent to launder illegal ivory.
13. Overseas purchasers must be approved and registered manufacturers in their respective countries, or approved and registered manufacturers' trade associations. Certificates to this effect must be provided, bearing the seals of both the national CITES Management Authority and the CITES Secretariat, each of which may disqualify a purchaser for its own reasons. In addition, the Board may disqualify any purchaser if it decides that his activities (past or present) have been detrimental to CITES or this system of trade control.
14. A CITES Secretariat officer will be invited to each auction to oversee the proceedings and to seal each shipment prior to export.
15. In addition to each national CITES export permit, SACIM will issue a unique certificate for each shipment. These certificates will be printed on security paper and all blank certificates will be held by the CITES Secretariat. Importing countries must insist on receipt of both the national permit(s) and the SACIM certificate before allowing importation. An additional SACIM security tag may be attached to each tusk.
16. Each participating country may include up to one tonne of confiscated ivory in its maximum annual ivory production limit. Such ivory may be included routinely in auction stock.
17. Confiscated ivory above this limit will be held in store at SACIM pending the Board's decision which will be made on the following basis:

- a) If the ivory is believed to originate from within the region, it will be auctioned (with the revenue accruing to the confiscating country) and the Board will decide on any appropriate action required with respect to adjusting maximum annual ivory production limits in the next year.
 - b) If the ivory is believed to originate from outside the region and from an Appendix II population, it will be offered for sale firstly to any external "compensation" fund established for this purpose. Failing this, it will be sold by SACIM. The proceeds will be paid into the SACIM Conservation Fund after deduction of 10% to recompense the confiscating country.
 - c) If the ivory is believed to originate from outside the region and from an Appendix I population, it will be offered for return to the country of origin subject to receipt of 10% of its commercial value as recompense to the confiscating country for expenses incurred. Failing this, it will be held by SACIM while the matter is referred to the Conference of the Parties to CITES for consideration. Should this fail to produce a satisfactory solution, the Board will decide the matter.
18. Hunting trophies will continue to be dealt with under existing systems and will be subject to internal quotas within the national maximum annual ivory production limits.
 19. Each participating country will increase enforcement activities to prevent the use of the region as a conduit for illegal ivory from other areas. In addition, penalties for poaching and ivory smuggling will be increased, where necessary and as soon as possible, to a specified minimum to be established by the Board.
 20. Techniques recently perfected within the region will be used to determine the origin and age-since-death of tusks. Random checks using this technique will be arranged by the Board.

ADDITIONAL CONSIDERATIONS

1. Importing countries should establish adequate controls to ensure that the legal ivory trade is not used as a cover for the illegal trade. The Board may limit the countries to which ivory may be exported, and will take into consideration the measures taken to control trade by each importing country.
2. The system will be implemented under a regime of either Appendix II listing or Appendix I listing with reservations or any combination of these. However, if the system is operated under a regime of reservations, several of the above-mentioned mechanisms will be adjusted or deleted to take this into account. In particular, the requirement to sell only to approved manufacturers in certain countries will be waived and the involvement of the CITES Secretariat and Standing Committee will be reduced or eliminated (since neither can become involved in authorizing commercial trade in Appendix I species). Since it is impractical and contrary to the unified regional approach to apply different controls to countries within the region, it must be emphasized that if any single country enters a reservation, the others should enter similar reservations and the whole system will be operated under the "reservations regime".

3. Importing countries will be urged to support the system by continuing to allow the importation of manufactured ivory items as tourist souvenirs from the region and by preventing the importation of commercial shipments of manufactured ivory from the region.

4. A 6-12 month moratorium may be used to establish the system.

6. ESTABLISHMENT OF SACIM

The Government of Botswana has allocated a suitable plot of land on an industrial development site. It is over 16,000 m² in extent and will be rail-served in early 1990. It is anticipated that full external funding will have been obtained by September 1989 which will enable building to start soon thereafter. Pending appointment of the Executive Manager, the Botswana Department of Wildlife and National Parks will co-ordinate development of the project. Once SACIM is fully established it will be financially self-sufficient. It is anticipated that SACIM will become operational in early 1990 and that the first ivory auction will be held then.

7. CONCLUSIONS

7.1 The African elephant species does not qualify for inclusion in Appendix I since it is not currently threatened with extinction.

7.2 If certain geographically separate populations are considered to be currently threatened with extinction then these populations should be considered for transfer to Appendix I. However, retention of these populations in Appendix II with zero export quotas would provide the same immediate effect with greater future flexibility.

7.3 The elephant populations to the South of the line formed by the northernmost frontiers of Angola, Zambia, Malawi and Mozambique should be retained in Appendix II.

7.4 The regional approach described above is designed to ensure that those countries within the Southern African region experiencing the greatest problems with elephant management and poaching will receive the assistance needed to counter these problems. Major efforts will be made to raise standards in the region to a uniformly high level. Exclusion of individual countries on the basis of current poaching problems would result in negative effects and the region wishes to act positively. Thus, the system will include all those countries of the region that wish to participate and can provide the formal, binding commitment through their CITES Management Authority.

7.5 Attached as Annexes to this document is some indicative background information on elephant populations and management programmes in Southern Africa. This information is not intended to provide extensive coverage of the region, but is included as an indication of part of the overall approach envisaged for the region. It should be stressed that large numbers of elephants in Southern Africa occur outside protected areas. The continued existence of these elephants will probably depend in the long run entirely on rural community wildlife utilization programmes of the type already successfully established in the region. People in these rural communities already depend on revenue from elephants for their livelihoods.

Example of Approximate Calculations of Maximum
Annual Ivory Production Limits

1. An annual offtake of about 5% is sustainable.
2. Mean weight of ivory taken per elephant is about 10kg.
3. For each 1 000 elephant, 5% = 50 animals, $50 \times 10\text{kg} = 500\text{kg}$
4. Therefore, maximum annual ivory production limits for each country will be about 500 kg per 1 000 elephants.
5. This may be adjusted to take into account the circumstances peculiar to each country.

N.B. This is an indicative guide only. It is presented here to illustrate the basis on which the SACIM Board will work.

NUMBERS OF ELEPHANT IN BOTSWANA

<u>AREA</u>	<u>NUMBER</u>	<u>LAND AREA (sq.km)</u>
BLOCK B (HUNTING CONCESSION)	9,180	12,000
BLOCK C (CHOBE NATIONAL PARK)	26,226	12,400
BLOCK D (TRIBAL LAND/FOREST RESERVE)	4,584	6,200
BLOCK F (TRIBAL LAND/HUNTING CONCESSION/MOREMI GAME RESERVE)	8,000	15,600
BLOCK G (NXAI PAN NATIONAL PARK/STATE AND TRIBAL LAND)	12,400	13,650
BLOCK H (HUNTING CONCESSION)	6,280	12,740
BLOCK I (TRIBAL LAND)	40	4,875
TOTAL	<u>67,710</u> =====	<u>77,465</u> =====

NOTES

- 1) These figures derive from aerial censuses conducted in the wet season (early 1989).
- 2) The Blocks are census areas.
- 3) During the wet season, approximately 74% of elephants are in areas outside National Parks. During the dry season, this drops to about 58%.

ELEPHANT MANAGEMENT IN BOTSWANA

The Department of Wildlife and National Parks in Botswana has prepared an elephant management plan which may be summarized briefly as follows.

POLICY

- 1) Elephants will be managed on a multiply use basis incorporating the interests of conservation, tourism, and consumptive uses and scientific research.
- 2) National Parks and Game Reserves will serve as ecological baselines and thus be subject to minimal human manipulation while being monitored to detect ecosystem changes.
- 3) Wildlife Management Areas, Controlled Hunting Areas and other wilderness lands adjacent to National Parks and Game Reserves will be managed for the economic benefit of the local people through sustainable exploitation of elephants in accordance with the Wildlife Conservation Policy, 1986.
- 4) The Department of Wildlife and National Parks will have an active programme of monitoring the elephant population and its habitat.

MANAGEMENT

An annual offtake of approximately 2,500 elephants will be cropped to keep the population level stable (n.b. this figure may need to be increased since it was based on previous lower population numbers).

Scientific monitoring will include continuation of aerial censuses radio telemetry and gathering of biological data from cropped elephants.

Cropping will commence in 1990 and will be initially for a trial period of three years with the objective of stabilizing the population level. It will be undertaken on a contract basis by professional personnel. It will consist of killing entire family groups or breeding herds (but calves may be captured for export sale).

Benefits from cropping will be transferred to the local communities and to citizens in general.

The management option of hunting is presently being deferred but will be reviewed after the cropping trial period.

NUMBERS OF ELEPHANTS IN ZIMBABWE

AREA	NUMBER	LAND AREA (sq.km.)
Zambezi Valley		
Parks Estate (1987)	10 000	10 000
Communal Land	1 500	4 000
S.E. Lowveld		
Gonarezhou (1987)	3 800	5 277
Communal Land	300	1 000
Matabeleland N		
Hwange National Park (1989)	21 000	14 000
Matetsi Safari Area (1989)	5 100	4 600
Communal Land	500	11 000
Forest land	300	3 000
Matabeleland S		
Tuli Safari Area	200	410
Remainder	500	4 000
Sebungwe		
Chete Safari Area (1989)	500	1 068
Chizarira National Park (1989)	1 800	1 900
Chirisa Safari Area (1989)	600	1 700
Matusadona (1989)	800	1 340
Communal Lands (1989)	4 000	8 717
Private Farms	200	2 000
TOTAL	51 700	74 018

ELEPHANT MANAGEMENT IN ZIMBABWE

BACKGROUND

In the early 1900s, the number of elephants in Zimbabwe was unlikely to have been higher than 5 000 following the intensive hunting for ivory by white hunters during the nineteenth century. Populations began to increase rapidly when protected areas were established progressively during the period 1920 - 1960.

By 1960 there were about 30 000 elephants and the first signs of change in habitats became noticeable in certain national parks. Concern for the disappearance of woodlands has resulted in 44 000 elephants being killed since 1960 with the majority being removed in government culling operations.

The elephant population in Zimbabwe today numbers about 52 000, despite the very large offtakes of the last 30 years. The population increase can only be accounted for by a growth rate of almost 5% per annum. Had population reductions not been carried out, the number of elephants in the country today would have been over 130 000.

Not only would such a large population have destroyed its own habitat, but also it would have resulted in extreme conflict with agriculture in adjacent farming areas. Had government not taken the necessary corrective action, local people certainly would have.

The elephant range in Zimbabwe continues to expand even in 1989. Because of favourable attitudes in neighbouring communal lands, people are prepared to tolerate elephant because of their high economic value. Commercial game farmers are re-introducing elephant to parts of Zimbabwe which have been without them for fifty years.

CURRENT MANAGEMENT

The Department of National Parks and Wild Life Management views elephant management as an ongoing adaptive process from which experience is being gained through continuous monitoring of habitats and populations. Management frequently has complex and multiple objectives, and involves compromises between aesthetic and technical decisions. Whilst wishing, on the one hand, to provide large numbers of elephants for tourist viewing in national parks or for sport hunting in safari areas, on the other hand the maintenance of entire ecosystems for general biological diversity often has to take precedence according to the goals of Park Plans.

In general, the approach to management can be condensed to the following principles:

1. Numbers of elephants in the Parks and Wild Life Estate are held to a level which prevents the loss of key woodland types, or will allow woodland to regenerate where it has already been destroyed. The general conditions for ecosystem conservation are specified in policy documents and Park Plans. Some flexibility is permitted in their interpretation with numbers of elephants in the prime game viewing areas often being allowed to exceed technically specified limits.
2. Whenever elephants populations have to be reduced, this is done by removing complete breeding herds. This ensures that the population age structure is not altered, and reduces the trauma which would arise from selective hunting. It is important to note that population growth cannot be checked by hunting male elephant (except in the extreme case where all breeding males are removed).
3. Treatments of different elephant populations may be deliberately varied for experimental reasons. Elephant numbers are seldom regulated on a day-to-day basis and the disturbance of a major population reduction may be limited to short periods separated by several years. The possible adverse effects of attempting to hold all populations at a constant density are appreciated and this practice is avoided.
4. In areas set aside for sport-hunting, male elephant are managed for a sustained yield of large trophy tusks. This implies a low offtake (less than 1% of the population). The Department has discontinued the practice of hunting female elephant for sport because of the adverse selective effects on population age structures.
5. Outside the Parks and Wild Life Estate, elephant numbers are controlled largely by public attitude. Where there is a conflict with rural agriculture, the Department is obliged to remove problem animals and keep elephant densities low. However, with the recent trend towards wildlife becoming the major land use in many communal lands, rural people are prepared to tolerate fairly high densities of elephants because of the significant financial returns from sport hunting, ivory, skin and meat.
7. Nowhere in Zimbabwe are elephant killed specifically for their ivory - except possibly through a very low illegal offtake. Ivory is a by-product of management. However, it is necessary to point out the inevitability of ivory production. If the government does not cull inside protected areas, the level of problem animal control rises outside them and illegal offtake also increases. Elephant die naturally all the time and produce a steady flow of ivory. The volume of ivory production is simply a function of the size of the elephant population which a country can afford to carry.

FUTURE MANAGEMENT

Despite major efforts to limit the numbers of elephant in Zimbabwe to a level which allows significant areas of mature woodland, the population has increased beyond desired numbers by many thousands. The target population since 1975 has been about 33 000 elephants but the actual population is now well above 50 000.

In the coming years the Department will continue to reduce the elephant population. With an annual growth rate of 5% the minimum offtake which will prevent further increase is 2 500 per year. Offtakes in excess of this will be necessary to achieve any significant population reduction.

The risks in delaying the task are two-fold. If the population continues to rise, not only will larger offtakes be necessary to stabilise the situation, but also the process of habitat damage will accelerate.

A typical management programme for 1990 is given below:

AREA	ELEPHANT :		LEGAL OFFTAKE		Natural Illegal:		TOTAL
	POPULATION :	Cull	Hunting	Control :	Mortality	Hunting:	
National Parks	30 700	2 500			307	31	2 838
Safari Areas	13 000	1 500	110		130	13	1 753
State Forests	800		15		8	1	24
Communal Lands	6 800	100	50	50	68	7	275
Commercial Farms	400		3	4	4		11
TOTALS	51 700	4 100	178	54	517	52	4 901

Population at start of year	51 700
Expected 5% increase	2 585
Subtotal	54 285
Less offtake (excluding natural mortality)	4 384
FINAL POPULATION	49 901