

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

Eighteenth meeting of the Conference of the Parties
Colombo (Sri Lanka), 23 May – 3 June 2019

SUPPLEMENTAL INFORMATION SUPPORTING THE CITES COP18 PROPOSAL
TO LIST *GIRAFFA CAMELOPARDALIS* ON APPENDIX II,
AS SUBMITTED BY THE CENTRAL AFRICAN REPUBLIC, CHAD, KENYA, MALI, NIGER AND SENEGAL

This document has been submitted by Chad and Niger in relation to proposal CoP18 Prop. 5.*

Introduction

This document has been compiled to supplement the information provided in the CITES CoP18 proposal to list *Giraffa camelopardalis* on Appendix II, as submitted by Central African Republic, Chad, Kenya, Mali, Niger and Senegal.

The document highlights a number of key points:

- *G. camelopardalis* is traded internationally;
- International trade is impacting the species; and
- The species meets the criteria in Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II.

Existence of *Giraffa camelopardalis* within international trade

While the full scale of global trade in the species is not precisely known, national datasets are available documenting the international trade in *G. camelopardalis*, which is predominantly in bone carvings, bones, trophies, skin pieces, bone pieces, skins, and jewelry. The information provided in the CITES CoP18 proposal, based on data from the United States Law Enforcement Management Information System (LEMIS) database maintained by the U.S. Fish and Wildlife Service, indicates that from 2006-2015, the U.S. alone imported a total of 39,516 giraffe specimens (see Annex, Table 1). The most commonly-traded items were bone carvings (21,402), bones (4,789), trophies (3,744), skin pieces (3,008), bone pieces (1,903), skins (855), and jewelry (825). Other giraffe specimens imported to the U.S. included shoes (528), hair (501), small leather products (366), feet (339), large leather products (325), horn (ossicone) carvings (201), and smaller numbers of skulls, hair products, specimens, tails, skeletons, rugs, shell products, carapaces, trim, wood products (e.g. furniture), plates, genitalia, horns (ossicones), live animals, bodies, teeth, eggshells (e.g. ostrich egg products with giraffe hair affixed), ears, legs, and unspecified products.

It is difficult to determine the exact scale of the international trade in *G. camelopardalis* given the lack of global trade monitoring due to the fact that the species is not listed in the CITES Appendices. However, there is clear evidence that the species is in demand internationally. As documented in the proposal, recent online trade studies found 321 giraffe products offered for sale in seven countries within the European Union.¹ A recent investigation of giraffe trade in the U.S. found giraffe parts for sale country at more than 52 U.S. locations throughout the country.² Western boots made from giraffe leather and specialty knives/knife products made from giraffe bone were the most commonly found giraffe products in the U.S. Other giraffe products found in

* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

¹ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

² <http://www.hsi.org/assets/pdfs/giraffe-report-HSI-HSUS-082318.pdf>

the U.S. included giraffe taxidermy “trophies;” giraffe hide pillows and rugs; giraffe skin bible covers and furniture; and giraffe bones and bone carvings. In addition, according to the EAZA, 870 living individuals were counted in 162 zoological parks the European Union space in 2018.

Therefore, there is no doubt that significant international trade in giraffe exists.

Impact of international trade on the species

Both the 2018 and 2016 assessments of the giraffe for the IUCN Red list resulted in a Vulnerable classification due to an observed population decline of 36-40 percent over three generations (30 years, 1985-2015).³ The previous assessment of the giraffe was of Least Concern (2010). The 2018 and 2016 assessments recognized that the population of mature individuals is decreasing: in 1985 it was estimated at 106,191-114,416 but by 2015 it had declined to only 68,293. The 2018 assessment identifies four primary threats – habitat loss; civil unrest; illegal hunting; and ecological changes – but also recognized that “the species has been overlooked in terms of research and conservation” and recent efforts have focused upon assessing “population size and distribution.”⁴

The giraffe is currently not listed under CITES. The proposal’s proponents are concerned that the substantial international trade in giraffe parts documented in their proposal may be, or may become, harmful to giraffe populations – especially in light of the other ongoing threats to giraffes. Accordingly, their proposal to list giraffes in Appendix II seeks to establish regulation of trade to ensure that it is not detrimental to the survival of the giraffe, and that specimens in trade are legally acquired. Requiring CITES export permits will provide essential missing data on the levels and sources of giraffe parts and derivatives in trade and help ensure that demand for bones, skins, and other parts are not further contributing to the species’ decline.

It should be noted that the taxonomy used in the proposal, which recognizes one species of giraffe (*G. camelopardalis*), is based upon the CITES-accepted nomenclatural reference for mammals:⁵ Wilson & Reeder’s Mammal Species of the World, third edition (2005).⁶ It is also consistent with the taxonomy used in the 2018 IUCN Red List assessment.⁷ As noted in the proposal, the proponents are aware of the ongoing scientific discussion surrounding giraffe taxonomy; however, this debate is not a reason to withhold support for the proposal. As noted in Resolution Conf. 12.11 (Rev. CoP17), on *Standard nomenclature*, a change in taxonomy cannot alter the scope of protection intended by the original listing. The scope of the present giraffe proposal is all giraffe populations in Africa and, if the proposal is approved, any future taxonomic changes would not change this scope. For example, when taxonomy of Appendix II-listed *Naja naja* (cobra) was revised and the species was split into eleven species, all eleven were listed on Appendix II. Similarly, if the giraffe species is divided into four species in future, all four would be listed on Appendix II. In addition, CITES has always solved the issue of resemblance considering the higher genome when listing species on CITES Appendices.

Even if the giraffe is split into four or more species, this does not change the fact that it is difficult, if not impossible, to distinguish giraffe parts in trade to the species or subspecies level, particularly since specimens in trade include bone carvings. Consequently, the option of listing some but not all giraffe populations or subspecies (a so-called “split listing”) would undoubtedly create enforcement problems. It is for this reason that species can be listed on Appendix II if they look like other species listed on that Appendix.⁸

Thus, whether there are one, four, or more species of giraffes, given they all look alike, especially in trade, all giraffes meet the Appendix II criteria.

³ <https://www.iucnredlist.org/species/9194/136266699#assessment-information> and Muller, Z. et al. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). *The IUCN Red List of Threatened Species 2018*: e.T9194A136266699.

<http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>

⁴ Muller, Z. et al. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). *The IUCN Red List of Threatened Species 2018*: e.T9194A136266699. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>

⁵ CITES Resolution Conf. 12.11 (Rev. CoP17), <https://cites.org/sites/default/files/document/E-Res-12-11-R17.pdf>

⁶ <https://www.departments.bucknell.edu/biology/resources/msw3/browse.asp?s=y&id=14200476>

⁷ Muller, Z., Bercovitch, F., Brand, R., Brown, D., Brown, M., Bolger, D., Carter, K., Deacon, F., Doherty, J.B., Fennessy, J., Fennessy, S., Hussein, A.A., Lee, D., Marais, A., Strauss, M., Tutchings, A. & Wube, T. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). *The IUCN Red List of Threatened Species 2018*: e.T9194A136266699. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>. Downloaded on 23 January 2019. <https://www.iucnredlist.org/species/9194/136266699#population>

⁸ CITES, art. II paragraph 2(b) (Appendix II shall include “other species which must be subject to regulation in order that trade in specimens of certain species referred to in sub-paragraph (a) of this paragraph may be brought under effective control”).

The 2018 IUCN giraffe assessment recognizes nine giraffe subspecies, of which four are increasing (*G. c. angolensis*, *G. c. giraffa*, *G. c. peralta*, *G. c. rothschildi*), four are decreasing (*G. c. antiquorum*, *G. c. camelopardalis*, *G. c. reticulata*, *G. c. tippelskirchi*), and one is stable (*G. c. thornicrofti*) (see Annex, Table 2). Two are classified as Critically Endangered (*G. c. antiquorum*, *G. c. camelopardalis*), one as Endangered (*G. c. reticulata*), two as Vulnerable (*G. c. thornicrofti*, *G. c. peralta*), one as Near Threatened (*G. c. rothschildi*), and one as Least Concern (*G. c. angolensis*). The remaining two subspecies were not assessed. Five of the nine subspecies have small population sizes (defined as <5000 in Resolution Conf. 9.24 (Rev. CoP17)): *G. c. antiquorum*, *G. c. camelopardalis*, *G. c. thornicrofti*, *G. c. peralta*, *G. c. rothschildi*. Three of the nine subspecies have very small population sizes (defined as <500 in Resolution Conf. 9.24 (Rev. CoP17)): *G. c. camelopardalis*, *G. c. thornicrofti*, *G. c. peralta*.

There is direct evidence of international trade in all giraffe subspecies (see Annex, Table 2).

IUCN noted in its assessment that the Critically Endangered giraffe subspecies, *G. c. antiquorum*, is affected by international trade in giraffe bushmeat within Central Africa.⁹ The U.S. import data from 2006-2015 included imports of giraffe specimens that originated in countries with all other giraffe subspecies. According to these data, while most specimens imported to the U.S. originated in South Africa (31,245 specimens) or Zimbabwe (5,249 specimens), where the populations of the relevant subspecies are increasing, other giraffe specimens originated in countries with Critically Endangered, Endangered, and Vulnerable subspecies, or those with declining or small populations. Available data show that the number of giraffes involved in this trade is small in comparison to exports from South Africa and Zimbabwe, but for threatened species, or those with small or declining populations, the impact of even limited trade could be highly detrimental. Examples of concern include: the 692 specimens imported to the U.S. between 2006 and 2015 from Tanzania, where according to 2018 assessment, the giraffe population decreased by 52 percent since 1977-1980; and the four trophies and one skin imported to the U.S. between 2006 and 2015 from Zambia, where the giraffe population includes only 420 mature individuals.

The U.S. import data also show that the top exporting country, South Africa, exported to the U.S. giraffe specimens that originated in other countries. These exports include 50 wild sourced bones of Somalia origin that were exported for commercial purposes in 2012. The giraffe subspecies that exists in Somalia, *G. c. reticulata*, is Endangered and the population has declined by 77.8 percent since the 1990s. Furthermore, 449 giraffe specimens, most exported from South Africa, had an “unknown” country of origin (see Annex, Table 3) and could have originated from threatened, declining or small populations. The 2018 IUCN assessment of giraffes further recognizes that illegal hunting is a concern in southern Africa.¹⁰ Thus, even if giraffe populations there are stable, ensuring exported giraffe parts were legally acquired is important to curtailing the threat of illegal hunting.

The trade data in the proposal and collected herein represents only a portion of all international trade in giraffe specimens, as it represents U.S. import data and some information about the EU market. A CITES Appendix II listing would provide data for all giraffe trade globally, for all purposes, and from all sources. Such a database would reveal, for the first time, the true extent of the trade and possibly shed light on its impact on giraffe conservation.

Therefore, existing information (summarized in Annex, Table 2) clearly indicates that there is international trade in giraffe specimens that originated from countries where giraffe populations are Critically Endangered, Endangered, Vulnerable, decreasing, and/or small. While controlled trade in some populations of giraffes may be non-detrimental and legal, any trade from populations that are Critically Endangered, Endangered, Vulnerable, decreasing, and/or small is likely to have a harmful effect on the conservation status of those subspecies.

The species meets the criteria in Resolution Conf. 9.24 (Rev. CoP17) for inclusion in Appendix II

G. camelopardalis is affected by trade as defined in Annex 5 of Resolution Conf. 9.24 (Rev. CoP17) part ii): “it is suspected to be in trade, or there is demonstrable potential international demand for the species that may be detrimental to its survival in the wild”. Accordingly, *G. camelopardalis* meets the criteria for listing on Appendix II under Article II, paragraph 2 of the Convention and satisfying Criterion B in Annex 2a of Resolution Conf. 9.24 (Rev. CoP17). Regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences. The preambular text and Annex 4 of Resolution Conf. 9.24 (Rev. CoP17) state

⁹ <https://www.iucnredlist.org/species/88420742/88420817>

¹⁰ <https://www.iucnredlist.org/species/9194/136266699>

that in cases of uncertainty regarding the status of a species or the impact of trade on the conservation of a species, the Parties shall act in the best interest of the conservation of the species concerned. Adoption of this proposal will ensure that trade in *G. camelopardalis*, including subspecies that are Critically Endangered, Endangered, Vulnerable, declining and small can be adequately monitored and subject to non-detriment and legal acquisition findings. The precautionary principle is an important aspect to take into account in the process of listing species in CITES Appendices.

Appendix III is not a substitute for Appendix II. Exports of specimens of species listed on Appendix III does not require the making of a non-detriment finding, and only requires the listing country to make a finding of legal acquisition; all other countries would make no findings. In contrast, export of specimens of species listed on Appendix II requires findings of legal acquisition and non-detriment from all exporting Parties. Given the vulnerable and declining status of the giraffe and large volumes of international trade that includes giraffe specimens that originated from countries with Critically Endangered, Endangered, Vulnerable, declining and/or small populations, Appendix II regulation of trade is what is needed to ensure that what is being traded is legal and not detrimental.

The necessity to fight illegal trade fueled by armed conflicts

A significant portion of the giraffe's range states (including Somalia, the Democratic Republic of Congo, South Sudan, and northeastern Kenya) are home to areas disturbed by armed conflict, which exacerbates the poaching and illegal trade of giraffes. In these zones of conflict, wildlife is poached, bushmeat is consumed and the rest of the specimens are traded to fund criminal networks without any traceability. In Niger for example, the only country that still has the subspecies *G. c. peralta*, translocation efforts to increase the giraffe's chances of survival risk being thwarted by armed gangs stationed in northern Mali and Nigeria, countries neighboring Niger.

At the Elysee Summit for Peace and Security in Africa held in Paris on 6-7 December 2013, the heads of state and government of 53 countries declared that the establishment of terrorist and criminal networks, including poachers and traffickers of endangered species, is a threat to peace and security in Africa and throughout the entire world. They reaffirmed their commitment to fighting together against these threats. The Paris Declaration highlighted the impact of armed gangs that increasingly operate across borders, fueling the illegal trade and contributing to the extinction of several emblematic species, including giraffes.

The listing of giraffes on CITES Appendix II will help put a stop to the illegal trade of giraffes by ensuring traceability of trade.

Conclusion

Based on the information presented above, *G. camelopardalis* meets the criteria for listing on CITES Appendix II and the giraffe would benefit from such a listing. Given the large volume of international trade in *G. camelopardalis*, and that this trade includes specimens that originated from countries with Critically Endangered, Endangered, Vulnerable, declining and small populations, an Appendix II listing is necessary to ensure that the giraffe parts traded internationally are not detrimental to the survival of the species in the wild and are legally acquired.

Annex

Table 1. Total U.S. Giraffe Imports, 2006-2015, all sources and all purposes.¹¹

Wildlife Description	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTALS
Bone Carvings	2,933	4,194	1,641	2,735	1,736	233	790	1,418	1,495	4,227	21,402
Bodies	0	0	1	1	0	0	0	1	0	0	3
Bones	167	65	487	345	77	1403	350	434	775	686	4,789
Bone Pieces	1,691	2	15	9	10	2	37	7	76	54	1,903
Carapaces	38	0	0	0	0	0	0	1	0	0	39
Ears	0	0	0	0	0	0	0	0	1	0	1
Eggshells	0	2	0	0	0	0	0	0	0	0	2
Feet	18	9	22	37	45	29	69	58	23	29	339
Genitalia	0	0	2	1	0	0	0	0	2	1	6
Hair	400	2	5	1	0	1	0	81	0	11	501
Hair Products	10	0	0	2	2	0	1	0	3	100	118
Horn Carvings	0	0	0	0	0	3	0	63	48	87	201
Horns	0	0	0	0	0	2	3	0	0	0	5
Jewelry	53	66	670	0	10	0	5	9	5	7	825
Leather Products Large	2	3	6	18	32	11	11	58	76	108	325
Leather Products Small	5	4	3	1	1	3	42	147	58	102	366
Legs	0	0	0	0	0	0	0	1	0	0	1
Live	0	0	0	0	3	0	0	1	0	0	4
Plates	0	0	0	0	0	0	0	3	2	3	8
Rug	15	6	15	5	6	0	2	8	1	5	63
Shell Product	0	0	0	0	0	0	0	0	50	0	50
Shoes	0	0	0	0	0	0	0	2	8	518	528
Skeletons	0	0	0	0	0	0	0	0	0	64	64
Skins	16	22	115	18	307	9	18	22	163	165	855
Skin Pieces	50	310	85	133	34	245	62	704	465	920	3,008
Skulls	18	2	14	12	32	29	6	6	4	27	150
Specimens	1	0	0	19	0	0	50	6	0	25	101
Tails	1	0	1	15	7	6	18	7	5	5	65
Teeth	0	0	0	0	1	0	0	0	0	2	3
Trim	0	2	3	4	0	9	0	1	0	2	21
Trophies	425	372	339	405	280	328	342	408	386	459	3,744
Unspecified	10	0	0	2	1	0	0	1	2	0	16
Wood Products	0	0	0	6	0	1	0	3	0	0	10
TOTAL	5,853	5,061	3,424	3,769	2,584	2,314	1,806	3,450	3,648	7,607	39,516

¹¹ Proposal, https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf, p. 22.

Table 2. Giraffe subspecies, conservation status and evidence of international trade.

Subspecies	Range States	Number of mature individuals	IUCN Status	Population Trend	Evidence of International Trade
<i>G. c. antiquorum</i>	Cameroon, Central African Republic, Chad, Democratic Republic of Congo, South Sudan	1,400	CR ¹²	Decreasing	Giraffe bushmeat traded transboundary within Central Africa. ¹³
<i>G. c. camelopardalis</i>	Ethiopia, South Sudan	455	CR ¹⁴	Decreasing	U.S. imported one wild source trophy from Ethiopia in 2008; unknown if <i>G. c. camelopardalis</i> or <i>G. c. reticulata</i> . ¹⁵
<i>G. c. reticulata</i>	Kenya, Somalia, Ethiopia	11,048	EN ¹⁶	Decreasing	U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ¹⁷ U.S. imported one wild source trophy from Ethiopia in 2008; unknown if <i>G. c. camelopardalis</i> or <i>G. c. reticulata</i> . ¹⁸ U.S. imported 50 wild source bones that originated in Somalia but were exported from South Africa in 2012 for commercial purposes. ¹⁹ U.S. imported one tail and one hair item in 2009 that originated in Somalia but were exported from Italy for personal purposes. ²⁰
<i>G. c. tippelskirchi</i>	Kenya, Tanzania	31,611	Not assessed	Decreasing	U.S. imported 692 specimens from Tanzania, 2006-2015. ²¹ This included 670 wild source jewelry items for commercial purposes (2008) exported from Tanzania and wild source for personal purposes: 1 hair item (2006) and 20 jewelry pieces (2007) both exported from Tanzania, and 1 bone piece (2006) exported from Zimbabwe. ²² U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ²³
<i>G. c. thornicrofti</i>	Zambia	420	VU ²⁴	Stable	U.S. imported from Zambia four wild source trophies (in 2006, 2008, and

¹² <https://www.iucnredlist.org/species/88420742/88420817>

¹³ <https://www.iucnredlist.org/species/88420742/88420817#threats>

¹⁴ <https://www.iucnredlist.org/species/88420707/88420710>

¹⁵ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

¹⁶ <https://www.iucnredlist.org/species/88420717/88420720>

¹⁷ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

¹⁸ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

¹⁹ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁰ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²¹ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

²² U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²³ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁴ <https://www.iucnredlist.org/species/88421020/88421024>

Subspecies	Range States	Number of mature individuals	IUCN Status	Population Trend	Evidence of International Trade
					2011) for hunting purposes, and one wild source skin in 2008 for hunting purposes.
<i>G. c. angolensis</i>	Namibia, Botswana	10,173	LC ²⁵	Increasing	U.S. imported 685 specimens from Namibia, 2006-2015. ²⁵
<i>G. c. giraffa</i>	Zimbabwe, Mozambique, South Africa, Botswana	21,387	Not assessed	Increasing	U.S. imported 31,245 specimens from South Africa and 5,249 specimens from Zimbabwe, 2006-2015. ²⁷
<i>G. c. peralta</i>	Niger	425	VU ²⁸	Increasing	U.S. imported one wild-sourced skin for personal purposes in 2009 from Nigeria; the giraffe is extinct in Nigeria but this could have been <i>G. c. peralta</i> .
<i>G. c. rothschildi</i>	Uganda, Kenya	1,399	NT ²⁹	Increasing	U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ³⁰

²⁵ <https://www.iucnredlist.org/species/88420726/88420729>

²⁶ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

²⁷ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

²⁸ <https://www.iucnredlist.org/species/136913/51140803>

²⁹ <https://www.iucnredlist.org/species/174469/51140829>

³⁰ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

Table 3. Raw data on U.S. imports (2006-2015) of giraffe specimens from select countries of origin.³¹

Genus	Species	Wildlife Descr. ³²	Qty	Unit ³³	Ctry Org ³⁴	Ctry Exp ³⁵	Purpose ³⁵	Source ³⁶	Ship Date	US Importer	Foreign Exporter
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZW	ET	H	W	8/24/08		TAXIDERMY CO-OPERATIVE SOCIETY
GIRAFFA	CAMELOPARDALIS	JWL	3	NO	KE	KE	P	W	9/27/06		MOUNT KENYA ART GALLERIES
GIRAFFA	CAMELOPARDALIS	BOC	125	NO	KE	KE	T	W	11/27/07		
GIRAFFA	CAMELOPARDALIS	SKI	1	NO	NG	NG	P	W	12/22/2009		
GIRAFFA	CAMELOPARDALIS	TAI	1	NO	SO	IT	P		1/20/2009	VITTORIO TEDESCO ZAMMARANO	VITTORIO TEDESCO ZAMMARANO
GIRAFFA	CAMELOPARDALIS	HAI	1	NO	SO	IT	P		1/20/2009	VITTORIO TEDESCO ZAMMARANO	VITTORIO TEDESCO ZAMMARANO
GIRAFFA	CAMELOPARDALIS	BON	50	NO	SO	ZA	T	W	11/21/2012	TEXAS KNIFE SUPPLY(TKS)	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	HAP	1	NO	TZ	TZ	P	W	8/21/06		
GIRAFFA	CAMELOPARDALIS	JWL	20	NO	TZ	TZ	P	W	6/28/07		
GIRAFFA	CAMELOPARDALIS	JWL	670	NO	TZ	TZ	T	W	1/23/08	ART BY GOD	MENDA TAXIDERMY LTD
GIRAFFA	CAMELOPARDALIS	BOP	1	NO	TZ	ZW	P	W	7/2/06	TERRY ADAMS	VICTORIA FALLS HOTEL
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	3/11/06		TAXIDERMY ENTERPRISES
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	1/4/08		MUCHINGA ADVENTURES LIMITED
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	12/16/08		CHARLTON MCCALLUM SAFARIS
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	12/2/2011		BANGWEULU TAXIDERMY LIMITED
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	11/10/2014	Exemptions 6 and 7(C) ³⁷	
GIRAFFA	CAMELOPARDALIS	SKI	1	NO	ZM	ZW	H	W	3/12/08		TAXIDERMY ENTERPRISES PVT LTD
GIRAFFA	CAMELOPARDALIS	BOC	8	NO	XX	CA	P	W	9/10/2013	Exemptions 6 and 7(C)	
GIRAFFA	CAMELOPARDALIS	HAI	1	NO	XX	ZA	P	W	8/15/08		
GIRAFFA	CAMELOPARDALIS	FOO	1	NO	XX	CA	Q	W	11/22/2011	AMERICAN MUSEUM OF	CANADIAN MUSEUM OF NATURE

³¹ Source of Data: U.S. Fish and Wildlife Service, obtained under a Freedom of Information Act request.

³² Wildlife Descriptions: BOC (bone product or carving), BON (Bones (including jaws, but not skulls)), BOP (Bone pieces (not manufactured)), FOO (Foot), HAI (Hair), HAP (Hair product (including paint brushes, etc.)), JWL (jewelry (other than ivory jewelry)), LPS (Leather product (small manufactured including belt, wallet, watchband)), SKI (skin (substantially whole, including tinga frames)), SPE (Specimen (scientific or museum)), SPR (Shell product (mollusc or turtle)), TAI (Tails), TEE (Teeth (excluding tusk)), TRO (trophy (all the parts of one animal)).

³³ Unit: NO = number of items.

³⁴ Country codes: CA = Canada, ET= Ethiopia, IT = Italy, KE = Kenya, LS = Lesotho, NG = Nigeria, SO = Somalia, TZ = Tanzania, ZA = South Africa, ZM = Zambia, ZW = Zimbabwe, XX = unknown.

³⁵ Purpose codes: H = hunting; P = personal; T = commercial; Q = travelling exhibit.

³⁶ Source code W = wild.

³⁷ USFWS redacted this information.

Genus	Species	Wildlife Descr. ³²	Qty	Unit ³³	Ctry Org ³⁴	Ctry Exp ³⁵	Purpose	Source ³⁶	Ship Date	US Importer	Foreign Exporter
										NATURAL HISTORY	
GIRAFFA	CAMELOPARDALIS	HAI	20	NO	XX	LS	T	W	1/2/2013	ATHOL M FODEN DBA SAFARI GOLD USA	
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	11/1/2011	MASECRAFT SUPPLY COMPANY	ARNO BERNARD KNIFE
GIRAFFA	CAMELOPARDALIS	BON	2	NO	XX	ZA	T	W	12/21/2011	TUDOR FARMS	HEART WOOD BOWS
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	7/5/2012	MASECRAFT SUPPLY COMPANY	ARNO BERNARD KNIFE
GIRAFFA	CAMELOPARDALIS	BON	60	NO	XX	ZA	T	W	11/22/2012	GIRAFFE BONE KNIFE SUPPLY	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	12/13/2012	MASECRAFT SUPPLY COMPANY	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	BON	40	NO	XX	ZA	T	W	3/7/2013	GIRAFFE BONE KNIFE SUPPLY	
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	1/29/2014	TEXAS KNIFE SUPPLY(TKS)	
GIRAFFA	CAMELOPARDALIS	HAI	4	NO	XX	ZA	T	W	1/27/2012	SAFARI GOLD	PURE AFRIQUE JEWELLERS CC
GIRAFFA	CAMELOPARDALIS	LPS	62	NO	XX	ZA	T	W	5/24/2013	MASECRAFT SUPPLY COMPANY	
GIRAFFA	CAMELOPARDALIS	SPR	50	NO	XX	ZA	T	W	10/22/2014	Exemptions 6 and 7(C)	
GIRAFFA	CAMELOPARDALIS	TEE	1	NO	XX	ZA	T	W	3/19/2010	NATIONAL ORNAMENTAL MUSEUM	STELLENBOSCH UNIVERSITY