

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



Eighteenth meeting of the Conference of the Parties
Colombo (Sri Lanka), May 24- June 3, 2019

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

1. The inclusion of all populations of *Loxodonta africana* (African elephant) in Appendix I through the transfer from Appendix II to Appendix I of the populations of Botswana, Namibia, South Africa and Zimbabwe.
2. This amendment is justified according to the following criteria under Annex 1 of Resolution Conf. 9.24 (Rev. CoP16), Criteria for amendment of Appendices I and II:

"C. A marked decline in population size in the wild¹, which has been either...:

i) observed as ongoing or as having occurred in the past (but with a potential to resume); or

ii) inferred or projected on the basis of ...the following:

- levels or patterns of exploitation;"

3. It is further justified according to the opening paragraph of Annex 3 of Resolution Conf. 9.24, Special cases:

"Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates"

and according to the opening paragraph of Annex 4 of Resolution Conf. 9.24, Precautionary measures:

"When considering proposals to amend Appendix I or II, the Parties shall, by virtue of the precautionary approach and in case of uncertainty either as regards the status of a species or the impact of trade on the conservation of a species act in the best interest of the conservation of the species concerned and adopt measures that are proportionate to the anticipated risks to the species."

B. Proponents

Benin, Burkina Faso, Kenya, Liberia, Niger, Togo.

C. Supporting statement

1. Taxonomy

- | | |
|-------------|--------------|
| 1.1 Class: | Mammalia |
| 1.2 Order: | Proboscidea |
| 1.3 Family: | Elephantidae |

¹ A marked recent decline is defined in Resolution Conf. 9.24 (Rev CoP17) p.9 as "a percentage decline of 50% or more in the last 10 years or three generations, whichever is the longer". For elephants, mean generation length has been taken as 25 years (<http://www.iucnredlist.org/details/12392/0>).

- 1.4 Genus, species or subspecies, including author and year: *Loxodonta africana* (Blumenbach, 1797)
- 1.5 Scientific synonyms: --
- 1.6 Common names: English: African elephant
French: éléphant d'Afrique
Spanish: elefante africano
- 1.7 Code numbers: CITES A-115.001.002.001 (1984(1))
ISIS 5301415001002001001

2. Overview

4. This proposal seeks to list all African elephants populations in Appendix I in order to offer maximum protection under CITES in the face of the ongoing threat posed by the unsustainable demand from the ivory trade, the uncertainty of the impact of that trade on the species across its range, and the enforcement problems that current split-listing may create. Elephant populations in all regions of the species' range have experienced ongoing intense pressure from ivory poachers and depredations by criminal syndicates in recent years as evidenced by population declines and repeated high annual levels of poaching and ivory seizure indices.
5. With reference to criterion C for the proposed amendment (noted in section A above), a marked recent decline of the wild population in the last 3 generations (75 years) is sufficiently documented. The African elephant is categorized as threatened with extinction according to IUCN Red List criteria², and the causes include poaching for ivory and habitat loss. It is estimated there were 1.3 million elephants in Africa in 1979³. A 50% decline was documented by 1989 when elephants were listed in Appendix I. With the current, ongoing poaching crisis, numbers have declined steeply once again. At the end of 2015, according to the African Elephant Status Report (AESR) 2016⁴, an update of the African Elephant Database (AED)⁵ by the IUCN Species Survival Commission's African Elephant Specialist Group (AfESG), the total number of elephants was estimated as 415,428. This latest estimate indicated that a 68% decline had occurred over 36 years. In just the 9 years between 2006 and 2015, the AESR calculated a loss of approximately 111,000 elephants. Additional published scientific reports, summarised in section 4.2 below, suggest this level of decrease is an under-estimate of the threat and they have reported steeper declines in this period (e.g. 62% decline in elephant populations of the Congo Basin Range states⁶; loss of 100,000 elephants in a 3-year period on the basis of poaching indices⁷; 30% decline in elephant populations in >90% of savanna range in a 7-year period⁸). Prior, widespread and steep declines occurred during the intense poaching of the 1970s and 1980s (criterion C.i), followed by a period of population recovery in some areas in the 1990s and early 21st century⁹. With the recent rise in poaching, the declines have resumed and – unless urgent action is taken – are projected to continue (criterion C.ii) at unsustainable levels of exploitation. The threat posed by trade is pronounced at the continental level, including in some elephant populations in Appendix II countries.
6. Illegal killing of elephants for the ivory trade and trafficking of ivory is widespread across Africa according to reports of the CITES Monitoring Illegal Killing of Elephants (MIKE) Programme and Elephant Trade Information System (ETIS). As with the African Elephant Database, these sources are likely to underestimate the levels of illegal killing and international trading of elephants and their body parts, as noted in sections 5 and 6.4 below. In the face of the very clear threats, appropriate enforcement controls and compliance with the requirements of the Convention have been difficult to

²<http://www.iucnredlist.org/details/12392/0>

³ Douglas-Hamilton, I. (1979) *The African Elephant Action Plan*. IUCN/WWF/NYZS Elephant Survey and Conservation Programme.

⁴ Thouless, C.R., Dublin, H.T., Blanc, J.J., Skinner, D.P., Daniel, T.E., Taylor, R.D., Maisels, F., Frederick, H.L. & Bouché, P. (2016).

African Elephant Status Report 2016: an update from the African Elephant Database. Occasional Paper Series of the IUCN Species Survival Commission, No. 60 IUCN / SSC Africa Elephant Specialist Group. IUCN, Gland, Switzerland. vi + 309pp

⁵<http://www.elephantdatabase.org/>

⁶ Maisels, F., Strindberg, S., Blake, S., Wittemyer, G., Hart, J., et al. (2013) Devastating decline of forest elephants in Central Africa. *PLoS ONE*, 8(3): e59469. doi:10.1371/journal.pone.0059469

⁷ Wittemyer, G., Northrup, J., Blanc, J., Douglas-Hamilton, I., Omondi, P., & Burnham, K. (2014), Illegal killing for ivory drives global decline in African elephants. *PNAS*, vol. 111 no. 36. Accessible at: <http://www.pnas.org/content/111/36/13117.abstract>
https://cites.org/eng/mike_figures2014.

⁸ Chase, M.J., Schlossberg, S., Griffin, C.R., Bouché, P.J.C., Djene, S.W., Elkan, P.W., Ferreira, S., Grossman, F., Kohi, E.M., Landen, K., Omondi, P., Peltier, A., Selier, S.A.J., Sutcliffe, R., 2016. Continent-wide survey reveals massive decline in African savannah elephants. *PeerJ*. <http://dx.doi.org/10.7717/peerj.2354>. (e2354).

⁹ UNEP, CITES, IUCN, TRAFFIC (2013) *Elephants in the Dust – The African Elephant Crisis. A Rapid Response Assessment*. United Nations Environment Programme, GRID-Arendal. Accessible at: www.grida.no

achieve. As widely agreed and according to the CITES Secretariat, the threat to wildlife populations from illegal killing requires action on a global scale¹⁰: “*No one country, region or agency can tackle illegal wildlife trade alone. Collective action across source, transit and destination states is essential.*” This commitment has been echoed in international fora on illegal wildlife trade, including the Brazzaville Conference of 2014¹¹, London Conferences in 2014 and 2018¹², and the Kasane Conference of 2015¹³. Furthermore, the National Ivory Action Plan (NIAP) process¹⁴, initiated by the Parties in 2013, is a testament to the agreed need for careful, comprehensive global action.

7. Decreasing population and increasing poaching trends in several Appendix II-listed populations are evident (as detailed in Sections 4.4, 4.5 and 5 below). Because the Southern African region holds so much of the continental elephant population (>50%)¹⁵ these developments are of great concern for the species as a whole. These trends, combined with threatened status of the species on a continental-scale, call into question the current split listing that was first established in the 1990s, during a time when population and poaching trends suggested recovery, not decline. Trends in rhino poaching and horn trafficking, not to mention those for elephants and ivory, in the region demonstrate that serious criminal networks are active¹⁶.
8. The listing of all African elephants in Appendix I in 1989 was followed by a collapse in global ivory markets and price, ending the prevailing poaching crisis¹⁷. During the following 15 years, many elephant populations recovered. However, the weakened protection of elephants and exemptions for trade since 1997 are associated with and likely a contributor to a reversal of this positive trend¹⁸. Economic analyses in recent years demonstrate that many factors may influence ivory markets and price growth¹⁹, leading to an uncertainty on the impact of even limited amounts of trade²⁰.
9. There have been several high-level initiatives by CITES Parties in recent years, including an annotation to the Appendix II listing, noting a 9-year moratorium on ivory trade proposals starting in 2008²¹, recommendation of domestic ivory market closures in 2016²² and, as noted above, country-specific NIAPs (National Ivory Action Plans) in ivory source, transit and destination countries. Taken together, these initiatives aim to improve the protection of the species so that continental decline is reversed and precautionary trade safeguards, as set forth in Annex 4 i.. and ii., are satisfied. However, with the present split listing, these safeguards have not been met. In order to rectify this, the proponents therefore consider a transfer of current Appendix II elephant populations to Appendix I as the next logical, essential and urgent step.

3. Species characteristics

3.1 Distribution

10. There are 37 countries in sub-Saharan Africa with elephant populations. Of the two main taxa (see section 3.3 below), savanna elephants are found primarily in Eastern Africa (8 countries²³) and Southern Africa (9 countries²⁴), with forest elephants living mainly in the Congo Basin of Central Africa

¹⁰ https://www.cites.org/eng/news/month-long-trans-continental-operation-hit-wildlife-criminals-hard_20062018

¹¹ http://www.greatervirunga.org/IMG/pdf/brazza_declaration_final_en.pdf

¹² <https://www.gov.uk/government/topical-events/illegal-wildlife-trade-2014> ; <https://www.gov.uk/government/topical-events/london-conference-on-the-illegal-wildlife-trade-2018>

¹³ <https://www.gov.uk/government/publications/illegal-wildlife-trade-kasane-statement>

¹⁴ <https://www.cites.org/eng/niaps>

¹⁵ Thouless *et al.* (2016) *ibid.*

¹⁶ <https://www.savetherhino.org/rhino-info/poaching-stats/>

¹⁷ UNEP, CITES, IUCN, TRAFFIC (2013) *ibid.*

¹⁸ CoP17. Inf. 96 Evidence should be used in global management of endangered species: A reply to the CITES Technical Advisory Group.

¹⁹ Gao, Y., Clark, S.G. (2014) Elephant ivory trade in China: Trends and drivers. *Biological Conservation*, 180: 23-30.

²⁰ Nadal, A. & Aguayo, F. (2016) Use or destruction: on the economics of ivory stockpiles. *Pachyderm*, 57: 57-67.

²¹ CITES (2016) Current rules on commercial international trade in elephant ivory under CITES and Proposals to CITES CoP17. Statement by the CITES Secretariat, 21 July, 2016.

https://www.cites.org/eng/news/Current_rules_commercial_international_trade_elephant_ivory_under_CITES_Proposals_CITES_CoP17_200716#6

²² Resolution Conf. 10.10 (Rev CoP17). Trade in elephant specimens. Resolution amended at the 11th, 12th, 14th, 15th, 16th and 17th meetings of the Conference of the Parties to CITES.

²³ Countries in East Africa with elephant populations: Eritrea, Ethiopia, Kenya, Rwanda, Somalia, South Sudan, Tanzania, Uganda

²⁴ Southern Africa: Angola, Malawi, Mozambique, Swaziland, Zambia (Appendix I); Botswana, Namibia, South Africa, Zimbabwe (Appendix II)

(7 countries²⁵). West Africa (13 countries²⁶) has elephants in both savanna and forest habitats. The elephant population of Mauritania has disappeared since 1989, while those of Senegal and Sierra Leone are under severe threat and at very low numbers.

11. The geographical extent and trends of elephant range areas are described in Section 4.5. Elephant populations in West Africa are distributed in small patches of highly fragmented habitat; while available habitat is more continuously distributed in Central, Eastern and Southern Africa, fragmentation is becoming an increasing problem in all regions.

3.2 Habitat

12. African elephants occupy a wide range of habitats, from near-desert in Namibia and Mali, through various types of semi-arid savanna ecosystem across much of the continent, to tropical forests in Central Africa.

3.3 Biological characteristics

13. Recent genetic and other findings support the designation of two species of African elephant: the savanna elephant (*Loxodonta africana*) and the forest elephant (*Loxodonta cyclotis*)²⁷. However, two species have yet to be formally recognized by the IUCN, in part because of known hybridization; the species designation is currently under review by the IUCN African Elephant Specialist Group. For this reason, CITES also recognises a single African species in its Identification Manual²⁸. In Southern Africa, only the savanna form is present.

3.4 Role of the species in its ecosystem

14. African elephants play a keystone role in shaping the structure of forests, woodlands and savanna, creating spatial heterogeneity and landscape-level diversity, dispersing seeds and facilitating access to water for a range of other species. The loss of such keystone megafauna from ecosystems could have profound and long-lasting negative effects on ecological structure and function²⁹. When confined by artificial barriers such as fences or land use blocking movement corridors, this habitat modification role may be seen as locally excessive in relation to the conservation of desirable plant and animal species³⁰.

4. Status and trends

4.1 Habitat trends

15. Habitat loss, through conversion of forests, savanna and corridors to plantation, subsistence agriculture and settlement is the most significant long-term threat to elephant populations. The AESR 2016 reports a steady loss of elephant range (see Section 4.5 below), although it also points out that changes to date cannot distinguish between contraction in true elephant range and changes/improvements in the way range is estimated. The AESR 2016 reports recent range expansion in selected sites in Kenya and Botswana only.

4.2 Population size

16. The primary source of data on elephant range areas and population sizes is the AED³¹. Reports from the AED were issued in 1995, 1998, 2002, 2007, and 2016. Estimates incorporated into the AED are

²⁵ Central Africa: Cameroon, Central African Republic, Chad, Republic of Congo, Democratic Republic of Congo, Equatorial Guinea, Gabon

²⁶ West Africa: Benin, Burkina Faso, Cote d'Ivoire, Ghana, Guinea, Guinea Bissau, Liberia, Mali, Niger, Nigeria, Senegal, Sierra Leone, Togo

²⁷ Roca, A.L., Ishida, Y., Brandt, A.L., Benjamin, N.R., Zhao, K. & Georgiadis, N.J. (2015) Elephant Natural History: A Genomic Perspective. *Annual Review of Animal Biosciences*, 3:139-167.

²⁸ <http://citeswiki.unep-wcmc.org/IdentificationManual/tabid/56/ctl/sheet/mid/369/currentTaxaID/12392/currentTaxaType/Species/currentKingdom/0/sheetId/659/language/en-US/Default.aspx>

²⁹ Barnosky, A.D., Lindsey, E.L., Villavicencio, N.A., Bostelmann, E., Hadly, E.A., Wanket, J. & Marshall, C.R. (2015) Variable impact of late-Quaternary megafaunal extinction in causing ecological state shifts in North and South America. *Proceedings of the National Academy of Science*. Accessible at: <http://dx.doi.org/10.1073/pnas.1505295112>

³⁰ van Aarde, R.J. & Jackson, T.P. (2007) Megaparks for metapopulations: Addressing the causes of locally high elephant numbers in southern Africa. *Biological Conservation*, 134: 289–297.

³¹ <http://www.elephantdatabase.org/>

first screened and scrutinised by a data quality working group for completeness and reliability.

17. The AESR 2016 includes data received through 2015; population numbers are categorized as 'Estimates' (e.g. based on data collected from aerial and ground surveys and reliable dung counts) and 'Guesses' (other dung counts and guesses). The most recent continental population total based on 'Estimates' is 415,428 (+/- 20,111). However, important areas that are difficult to survey are under-represented in this total, such as continuous forests in Gabon and Republic of Congo, to name a few.
18. The four Appendix II countries have a corresponding 2015 total of 255,851 and country totals as follows: Botswana 131,626, Namibia 22,754, South Africa 18,841, and Zimbabwe 82,630. The AESR 2016 noted, in its discussion of these national populations, that the transboundary nature of elephant populations in the region of northeastern Namibia, northern Botswana, southwestern Zambia, southeastern Angola and northwestern Zimbabwe known as the Kavango Zambezi Transfrontier Conservation Area (KAZA TFCA) requires coordination of surveys to avoid double-counting or undercounting. Elephants do not necessarily remain in a single country in such transboundary areas, which – on a continental scale – contain some 75% of total African elephant numbers³². As the surveys collated by the AESR were not conducted in a coordinated fashion, there is some doubt over the reliability of national population totals reported in the AESR 2016 for the KAZA countries.

4.3 Population structure

19. African elephants are matriarchal with adult females typically forming life-long families and other hierarchical groupings on the basis of kinship. Males disperse from natal family groups at maturity and form bonds with other males or live solitarily. The mean age of adults in and the social structure of elephant family groups are disrupted by poaching, which first targets the oldest adult animals with the largest tusks.³³ Such selective killing results in a cascade of behavioural, physiological and reproductive effects on the surviving elephant population³⁴. Since the oldest females, the matriarchs, are the repositories of knowledge of social relationships and ecological hazards and rewards, their irreversible loss affects the survival chances of entire families³⁵. The removal of the most successful adult bulls is likely to increase reproductive skewness and reduce genetic diversity in the surviving populations³⁶. The negative effect of drastic depletion of both females and male elephants on genetic diversity has been well documented in Uganda³⁷, which suffered massive losses during the 1970s-80s poaching crisis.

4.4 Population trends

20. The AESR 2016 notes that, because of methodological issues, trends of decline in countries within regions may be masked by changes in the type and quality of surveys between years and the possibility that additional elephant numbers estimated in surveys of some areas may compensate for reductions elsewhere.
21. The AESR 2016 states (p.29) that "*This is the first African Elephant Status Report in 25 years which has reported a continental decline in elephant numbers.*" These declines have been attributed primarily to a surge in poaching. While recent declines have been notable across all regions of Africa, the intensity of declines is uneven, with "hotspots" apparent in each region.
22. A separate compilation and modelling of survey data for Central Africa³⁸ has shown that for forest elephants "population size declined by ca. 62% between 2002–2011, and the taxon lost 30% of its geographical range." Because their demographic processes are slower than for the savanna elephant, the ability of forest elephants to recover from illegal killing is extremely limited.³⁹

³² Lindsay, K., Chase, M., Landen, K. & Nowak, K. (2017) The shared nature of Africa's elephants. *Biological Conservation*, 215: 260–267.

³³ Cobb, S. & Western, D. (1989) The ivory trade and the future of the African elephant. *Pachyderm*, 12: 32–37.

³⁴ Gobush, K.S., Mutayoba, B.M., & Wasser, S.K. (2008) Long-term impacts of poaching on relatedness, stress physiology, and reproductive output of adult female African elephants. *Conservation Biology*, 22: 1590–1599.

³⁵ McComb, K., Moss, C., Durant, S.M., Baker, L., & Sayialel, S. (2001) Matriarchs as repositories of social knowledge in African elephants. *Science*, 292, 491–494.

³⁶ Archie, E.A. & Chiyo, P.I. (2012) Elephant behaviour and conservation: social relationships, the effects of poaching, and genetic tools for management. *Molecular Ecology*, 21:765–7

³⁷ Nyakaana S., Abe E.L., Arctander P. & Siegmund H.R. (2001) DNA evidence for elephant social behaviour breakdown in Queen Elizabeth National Park, Uganda. *Animal Conservation*, 4: 231–237.

³⁸ Maisels *et al.* (2013) *ibid.*

³⁹ Turkalo, A.K., Wrege, P.H., Wittemyer, G., 2017. Slow intrinsic growth rate in forest elephants indicates recovery from poaching will require decades. *J. Appl. Ecol.* 54, 153–159. <http://dx.doi.org/10.1111/1365-2664.12764>.

23. An independent analysis published in 2014⁴⁰ of trends across Africa, using a study population in central Kenya to provide data for modelling of poaching in other populations at MIKE sites with known PIKE (Proportion of Illegally Killed Elephants) values, produced an estimate of a 3% reduction in the continental population for the single year 2011, and approximately 100,000 elephants lost to poaching in 2010-2012.
24. Approximately 90% of savanna elephant populations were surveyed systematically in 2014-2015 by The Great Elephant Census (GEC)⁴¹, a continent-wide programme of aerial surveys funded by Paul G Allen Philanthropies and working in collaboration with national governments and a number of NGOs. The results of the programme⁴² estimated a decline of 30% in 18 countries since 2007, with the annual rate of decline as high as 8% during 2010-2014.
25. The Southern Africa region as a whole experienced a decline during 2006-2015 of 8.6%, equating to almost 30,000 elephants on the basis of updated estimates for sites where comparable survey techniques were employed. In particular, Botswana, Zimbabwe and Mozambique had declines of 15%, 10% and 34% respectively⁴³.
26. **Botswana:** Elephant movement between countries in the transboundary KAZA region, as well as increased poaching and methodological differences are a likely contributor to the apparent decline in Botswana⁴⁴. Carcass ratios were among the largest of any site in the GEC in south-eastern Angola and south-western Zambia, both a part of KAZA TFCA and bordering Botswana.
27. **Namibia:** Surveys of elephants in Namibia, which were not coordinated with the other surveys under the GEC, showed an increase in numbers, particularly in the north-eastern area of the country where it shares a long border with north-western Botswana. The AESR 2016 notes that "...with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been."
28. **South Africa:** The AESR 2016 reports an increase of about 1000 elephants in South Africa between 2006-2015 on the basis of Estimates. Closures of artificial water in Kruger National Park, the site with the most elephants in the country, have been associated with a lowered rate of population growth (down to 4.2%).
29. **Zimbabwe:** Zimbabwe's population has declined due to reductions in populations in two regions, partially compensated by increases in populations in two other regions. The AESR 2016 reports: "*Whereas conservation challenges associated with high elephant densities in large protected areas were common in the region a decade ago, contemporary elephant conservation in southern Africa is now also faced with the emergence of a growing poaching threat (UNEP et al. 2013⁴⁵). While overall, poaching has not had the same impact in southern Africa as in other regions, it has severely affected populations in Zimbabwe, Angola, Mozambique, and to a lesser extent, Zambia*".

4.5 Geographic trends

30. The total range area (defined as 'Known' and 'Possible') across Africa was approximately 3.1m km² in 2015; this represents a 6% decrease compared to 2007 (3.3m km² reported), and a 36% decrease from 2002, which was itself an 8% decrease from the 1998 estimate. Some of this apparent range contraction may be due to improved information. However, despite the caveats over drawing quantitative conclusions about the rate of range loss, it is safe to accept that there has been a steady trend of decline over time in the range available for elephants.
31. As noted above in section 4.1, the loss of habitat through land conversion is a significant long-term threat to elephant populations. At the same time, it appears that pressure from poaching has in many areas (particularly tropical forests of Central Africa) either eliminated entire elephant populations or reduced population densities to very low levels⁴⁶.

⁴⁰ Wittemyer et al. (2014) *ibid*.

https://cites.org/eng/mike_figures2014.

⁴¹ <http://www.greatelephantcensus.com/>

⁴² Chase et al. (2016) *ibid*.

⁴³ Thouless et al. (2016) *ibid*.

⁴⁴ Thouless et al. (2016) *ibid*.

⁴⁵ UNEP, CITES, IUCN, TRAFFIC (2013) *Ibid*.

⁴⁶ Breuer, T., Maisels, F. & Fishlock, F. (2016) The consequences of poaching and anthropogenic change for forest elephants. *Conservation Biology*, Accepted article. DOI: 10.1111/cobi.12679

32. AED range data for Southern Africa indicate that there was a regional decline of some 21% of 'Known and Possible' range combined from 2002 to 2015 (however, there was a very slight increase between 2006-2015, attributable to range expansion in Botswana only).
33. The elephants' range over the four Appendix II countries now covers just over 504,000 km² (Botswana 228,073 km², Namibia 164,069 km², South Africa 30,651 km², Zimbabwe 81,228 km²). Summaries of elephant range issues in these four countries are provided below.
34. **Botswana:** In their northern range elephant populations have expanded westwards from the Chobe area into former range areas in the Okavango Delta and along the Kavango River; since 2006, there has also been range expansion southwards into the Central Kalahari Game Reserve, as far as Ghanzi and Kweneng Districts. Cross-border elephant movement occurs in the KAZA TFCA into Namibia, Zambia, Zimbabwe and Angola. A separate small population in the east of the country occurs in the Northern Tuli Block, with movement into south-eastern Zimbabwe and northern South Africa (i.e. the Greater Mapungubwe TFCA)⁴⁷.
35. **Namibia:** Namibia's elephant population occurs only in the north of the country, with most elephants found in the north-east in the KAZA areas bordering Botswana and Angola, particularly in Zambezi region and in Khaudom-Kavango. A separate population has been protected inside Etosha National Park, which is adjacent to the population of "desert elephants" in Kunene in the north-west. Community conservancies had land allocated in the past couple of decades, increasing elephant range in the north-east and to the north of Etosha NP⁴⁸. However, this range expansion pre-dates 2006 (the AESR 2016 reported range expansion in Kenya and Botswana only when comparing estimates from 2006 to 2015).
36. **South Africa:** The great majority of the country's elephants are in one area, Kruger National Park. Otherwise elephants are confined largely to fenced protected areas and private reserves in 2% of the country's total land area². Those reserves bordering Kruger have populations with ranges that are contiguous with the Park, but the others, which are isolated and scattered around the country, are too small to sustain viable populations. The on-going creation of trans-frontier parks and conservation areas with Mozambique and Zimbabwe could lead to the expansion of elephant ranges in all three countries, but efforts are partly being frustrated by the deteriorating situation in Mozambique and in Zimbabwe.
37. **Zimbabwe:** Zimbabwe's elephants are primarily found in four broad regions: Northwest Matabeleland, Sebungwe, the Southeast Lowveld and the Lower Zambezi Valley, each containing at least one national park plus communal conservancies and other protected land². In 2015, Hwange National Park (Northwest Matabeleland), a park that includes artificial water points and contiguous with Botswana, held the majority of the country's elephants. Since 2002, Zimbabwe has seen a decrease of greater than 20% of elephant range (compared to 2015 estimates in which 97% of all possible range was assessed). Decades ago, a successful communal conservancy model (CAMPFIRE) was initiated in Zimbabwe which contributed to range expansion then but its effectiveness has declined in recent years⁴⁹.

5. Threats

38. Across the continent, the long-term threat to elephants is the loss or conversion of habitat through human expansion into elephant range, associated human-elephant conflict and the impacts of climate change. In Central African forests, the impacts of forestry activities including both deforestation (habitat loss) and the building of roads (increasing human access) pose serious long-term and ongoing threats⁵⁰. However, the immediate, more critical short-term threat in all regions is high levels of killing driven by the ivory trade⁵¹.

⁴⁷ Blanc, J.J., Barnes, R.F.W., Craig, G.C., Dublin, H.T., Thouless, C.R., Douglas-Hamilton, I. & Hart, J.A. (2007) *African Elephant Status Report 2007: an update from the African Elephant Database*. Occasional Paper Series of the IUCN Species Survival Commission, No. 33, IUCN/SSC African Elephant Specialist Group, IUCN, Gland, Switzerland, vi + 276pp.

⁴⁸ *Ibid.*

⁴⁹ Balinta, P.J. & Mashinya, J. (2006) The decline of a model community-based conservation project: Governance, capacity, and devolution in Mahenye, Zimbabwe. *Geoforum*, 37: 805-815.

⁵⁰ Maisels *et al.* (2013) *op. cit.*

⁵¹ SC70 Doc 49.1. Annex 1.

39. Data from the MIKE programme – the primary source of data on levels of elephant poaching in Africa – indicates that by 2011, poaching reached the highest levels since the programme began in 2002⁵², with a moderately declining trend thereafter. However, poaching levels as indicated by PIKE values from MIKE sites remain high and unsustainable (indicated by PIKE >0.5). An analysis of PIKE data published in 2014 concluded that poachers killed 40,000 elephants in 2011 alone, and in just 3 years (2010-2012), 100,000 elephants were killed in Africa for their ivory⁵³.
40. All African elephant populations in all regions are at risk. The most recent MIKE analysis that examines PIKE data through the end of 2017 and reported by the CITES Secretariat in August 2018⁵⁴, shows that poaching levels remain unsustainable overall and especially in West, Central and Southern regions.
41. The MIKE programme is considered to provide conservative estimates of poaching rates based on ranger patrol monitoring⁵⁵. The MIKE sites with the best quality data are relatively intensively managed; therefore, PIKE values may underrepresent poaching mortality in a country if heavily based on such sites.
42. While attempts have been made to select MIKE sites that are representative of national and regional trends, some concerns are held that the existing sites do not adequately represent poaching losses and do not cover the whole of the elephant range. It was noted at the 65th CITES Standing Committee meeting⁵⁶ that "MIKE data...may have underestimated the true scale at which elephant populations are being decimated in parts of Africa." Examples of known significant declines in Tanzania⁵⁷ and five countries in Central Africa⁵⁸ were not detected by PIKE trends in MIKE sites in certain years in those areas. The decline and poaching increases in non-MIKE sites is also missed such as in Zambia (Sioma Ngwezi National Park, a part of KAZA TFCA). Here, the GEC found an exceedingly high carcass ratio of 85%. According to the Principle Investigator, "*The Kwando area of southwestern Zambia is experiencing the worst poaching of any major savanna elephant population*"⁵⁹, and warned that "because Sioma Ngwezi is close to Botswana's Okavango Delta region – the world's largest single remaining population – it's only a matter of time before poachers begin killing elephants there"⁶⁰.
43. The overall PIKE value for Southern Africa has now reached 0.48, with error bars exceeding the sustainability threshold of 0.5⁶¹. Notable increases in PIKE were recorded in Kruger National Park (South Africa) where an increase of PIKE by 44% occurred between 2016 and 2017. PIKE also increased in Chobe National Park, Botswana from 0 to 0.21 between 2016 and 2017. Other sites in the region are also showing increasing trends. Taking these results together, there is a clear indication of increasing levels of illegal killing, which is a cause for serious concern.
44. **Botswana:** The most recent MIKE report to the CITES Standing Committee meeting (SC70)⁶² noted the increasing levels of illegal killing in Botswana and South Africa. In 2015 it was reported that, "*Wildlife officials in Maun and Gaborone said that ivory poaching, previously kept at minimal levels by BDF operations and the absence of corruption in the wildlife department and law enforcement system, was now increasing and over three to four years had climbed to average 30-50 elephants a year in the Chobe-Linyanti region.*"⁶³ An aerial survey of wildlife in northern Botswana was undertaken in 2018. A final report is awaited. The survey team have stated publicly that "an unusually high number of elephant carcasses were seen."⁶⁴ This led to reports in the global media that about 90 elephants had

⁵² *ibid.*

⁵³ Wittemyer, G., Northrup, J., Blanc, J., Douglas-Hamilton, I., Omondi, P., & Burnham, K. (2014), Illegal killing for ivory drives global decline in African elephants. *PNAS*, vol. 111 no. 36. Accessible at: <http://www.pnas.org/content/111/36/13117.abstract>

⁵⁴ SC70 Doc 49.1 *op. cit.*

⁵⁵ Wittemyer *et al.*, *ibid.*

⁵⁶ SC65 Doc. 42.7. Disposal of Ivory Stocks.

⁵⁷ Jones, T. & Nowak, K. (2013) Elephant declines vastly underestimated. *National Geographic - A Voice for Elephants*, December 2013. Accessible at: <http://newswatch.nationalgeographic.com/2013/12/16/elephant-declines-a-view-from-the-field/>

⁵⁸ Maisels *et al.* (2013), *op.cit.*

⁵⁹ Cruise, A. (2016) Elephants Wiped Out on Alarming Scale in Southern Africa. *National Geographic*, 6 April 2016. Accessible at: <http://news.nationalgeographic.com/2016/04/160406-elephants-wiped-out-alarming-scale-Southern-Africa/>

⁶⁰ *Ibid.*

⁶¹ SC70 Doc 49.1 *ibid.*

⁶² SC70 Doc 49.1. Annex 1.

⁶³ <http://africanarguments.org/2015/07/23/no-longer-at-ease-clouds-on-the-horizon-for-botswanas-conservation-success-story-by-keith-somerville/>

⁶⁴ <http://elephantswithoutborders.org/uncategorized/ewb-statement-20-september-2018/>

been poached for ivory in the Okavango Delta⁶⁵ although the data and circumstances were challenged by the Botswana authorities⁶⁶.

45. **Namibia:** In Etosha National Park: In 2015, a report stated: "*Poachers killed 12 rhinos in Namibia's Etosha National Park and in north-western Kunene region so far this year, authorities said.... Poachers also slaughtered 11 elephants this year in north-eastern Zambezi and Kavango east regions... Poachers killed 23 rhinos and 76 elephants last year in Namibia, Romeo Muyunda, ministry spokesman said.*"⁶⁷ More recently, it was reported that by late 2016, rhino poaching had decreased, but elephant poaching had doubled compared to 2015⁶⁸.
46. **South Africa:** In 2017, 67 elephants were reported poached in Kruger National Park and predicted to reach approximately 100 elephants by year's end; this is a substantial increase from 46 poached elephants in 2016, which itself was an increase from prior years⁶⁹. Rhino poaching is a serious problem in the Park and fears that elephant poaching will continue to increase in turn are mounting.
47. **Zimbabwe:** Zimbabwe elephants⁷⁰ also face serious threat from ivory poachers. The most recent aerial surveys report steep declines in Mid-Zambezi Valley and Sebungwe areas of 40-75% respectively from 2001 to 2014, only partially offset by a steady increase in populations in the south-east bordering Botswana. However, in that area, approximately 362 elephants were reported killed by cyanide poisoning in 2014-2015⁷¹⁻⁷². In 2017, a further 53 elephants were killed for their tusks by the same method⁷³.
48. The fact that poachers are now targeting areas in Appendix II countries that had been considered "safe" is indicative of the level of pressure exerted by criminal syndicates and the vulnerability of the elephant populations. As noted above, many of these sites have ongoing, serious rhino poaching as well. The trend in poaching levels is one of increasing threat, and a projection of this trend would indicate that the Appendix II countries are facing a potentially large population decline, in line with the trend in numbers reported in the AED results (section 4.4 above).

6. Utilization and trade

6.1 National utilization

49. Elephants are utilized in a variety of ways in Africa: ivory, skin and hair are made into a variety of products; elephant meat is consumed in parts of West, Central and Southern Africa; elephants are hunted for sport; and live elephants are caught for entertainment purposes.
50. While Botswana has no legal domestic ivory market (except for allowing one-off transfers of ownership), legislation in Namibia, South Africa and Zimbabwe allows domestic sales of ivory subject to permit (although it is unclear if a moratorium is still in effect in Namibia – see section 6.5 below). However, effective tracking of retail ivory markets was reported to be only "Partial" in all three countries in 2004⁷⁴. It is therefore not clear whether the domestic ivory markets in the three countries are effectively monitored today. If these domestic markets are not closed, illegal trafficking will increase and ivory will be laundered through them from other African countries.
51. All four countries have legalized sport hunting of elephants – see section 7.1 National legislation. However, Botswana currently has a ban on all sport hunting, including that of elephants.
52. Products made from elephant hair were sold in Namibia, seemingly as a by-product of trophy hunting and according to CITES implementing legislation, parts from elephants may still be sold subject to permit - see section 7.1 National legislation. Zimbabwe's proposal to CoP12 (proposal Prop. 12.10) reported that hide is recovered from animals mainly shot for problem animal control (PAC) as well as

⁶⁵ Agence France-Presse (2018a) Botswana poaching spree sees 90 elephants killed in two months. *Guardian*, 4 September 2018. Accessed at: <https://www.theguardian.com/world/2018/sep/04/ninety-elephant-carasses-found-in-botswana-with-tusks-and-trunks-chopped>

⁶⁶ Agence France-Presse (2018b) Botswana rejects claims of elephant poaching surge. *Guardian*, 20 September 2018. Accessed at: https://www.theguardian.com/world/2018/sep/20/botswana-rejects-claims-of-elephant-poaching-surge?CMP=Share_iOSApp_Other

⁶⁷ <http://www.bloomberg.com/news/articles/2015-04-12/poachers-kill-12-rhinos-so-far-this-year-in-namibia>

⁶⁸ <https://conservationaction.co.za/recent-news/elephant-poaching-rhino-namibia/>

⁶⁹ <http://www.poachingfacts.com/poaching-statistics/elephant-poaching-statistics/>

⁷⁰ <http://www.bloomberg.com/news/articles/2015-02-18/zimbabwe-elephant-population-dwindles-amid-threat-from-poachers>

⁷¹ <http://www.ibtimes.com/poachers-allegedly-poison-22-elephants-death-zimbabwe-authorities-recover-tusks-2157935>

⁷² <http://www.theguardian.com/world/2015/oct/26/22-more-elephants-poisoned-cyanide-zimbabwe-reserve>

⁷³ <https://allafrica.com/stories/201802130838.html>

⁷⁴ TRAFFIC (2004) *Domestic ivory markets: Where they are and how they work*. Briefing Document for CoP13. TRAFFIC International, Cambridge.

on legal hunting operations, or killed for other management reasons such as "mercy killing or killing in self-defence". In South Africa, the hides from hunted PAC elephants can be sold. In 2002, it was reported that "Botswana presently does not recover elephant hide from elephant killed in protection of property due to lack of storage"; it was reported 12 years ago in 2006 that there was a small legal trade in hides, mainly to Zimbabwe⁷⁵.

6.2 Legal trade

53. The split-listing of African elephants means that commercial trade in specimens from elephant populations in Appendix I is not permitted, while exemptions allow ivory and other specimens from the populations of the four Appendix II countries to be traded. This means that CITES policy on elephants is being pulled in different directions. Allowing the use of conflicting policy instruments leads to confusing policy signals that are likely to be misinterpreted by existing market structures. Market networking and economic forces do not distinguish between Appendix I and Appendix II ivory and the evolution of poaching statistics appears to confirm this fact. This intrinsic tension of split-listing feeds expectations that ivory trade could be legalized. These expectations have an important influence on investment decisions since capital-widening investments are made to meet future market expansion. This leads to a consolidation of existing market institutions in the legal markets and also reinforces linkages between legal and illegal trade.
54. Under the Appendix II status of these elephant populations, two "one-off" sales of registered raw ivory from government-owned stocks (excluding seized ivory and ivory of unknown origin) were authorized – the first to Japan in 1999 and the second to Japan and China in 2008. For 9 years after the 2008 sale authorised at CoP14 (i.e. until 2017), it was decided "no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties"⁷⁶. However, Namibia and Zimbabwe were allowed to maintain exemptions for continuous sales of ivory as jewellery or "ekipas" (Namibia) – but see Section 6.5 below – and carvings (Zimbabwe) for "non-commercial purposes". These constant changes in objectives and policy instruments have the potential for reinforcing existing legal and illegal trade investments and institutions, and may lead to locking in of trajectories that further restrict policy alternatives.
55. A report by UNEP-WCMC on legal trade in elephant parts and derivatives for the period 2015-2016 was presented to the SC70 meeting⁷⁷. This report echoed results of the report for the period 2012-13 which was provided to the SC66 meeting⁷⁸. Reported legal trade in *L. africana* directly from African range States came principally from hunting trophies (including tusks). Records for 2015-16 showed the direct export of 12,543 kg and 133 tusks by number, while importing countries recorded the import of 124 kg and 752 tusks, a notable discrepancy, due in part to differences in reporting in source and destination countries.
56. The CITES Trade Database shows wide discrepancies between export and import records in a range of elephant products that are supposedly subject to transaction controls. For the year 2010 alone, it was noted that the figures for exports by Zimbabwe and imports into China were markedly different for ivory carvings, tusks and trophies⁷⁹. A broader analysis of figures from the CITES Trade Database⁸⁰ shows that over the 7-year period including 2010 to 2016 (no more recent figures are available), China reported receiving 293 ivory carvings, 513kg of tusks, and 263 trophies from Zimbabwe, while Zimbabwe's records of exports to China showed 6,229 ivory carvings, 4,677kg of tusks and only 25 trophies.
57. Trade in tusks reported by weight in 2015-16 was exclusively from Zimbabwe; exports were primarily hunting trophies and again there were discrepancies between the export and import records. Exports of tusks for trophies apparently exceeded quotas for Namibia and Botswana, although there was inconsistent reporting of parts from the same animal, either as separate trophies or combined into one

⁷⁵ Anon (2006) *Elephant Conservation and Management and the Ivory Trade in Botswana and South Africa*. Unpublished report. November 2006.

⁷⁶ Annotation 6 to the Appendix II listing of populations of *Loxodonta africana* in Botswana, Namibia, South and Zimbabwe. Appendices I, II and III, valid from 5 February 2015.

⁷⁷ SC70 Doc 49.1, Annex 1.

⁷⁸ SC66 Doc 47.1, Annex 1.

⁷⁹ Nuwer, R. (2018) How well does CITES really prevent wildlife trafficking and illegal trade? *Ensia*, October 4, 2018. Accessed at:

<https://ensia.com/features/cites/>

⁸⁰ <https://trade.cites.org/>; accessed on 29 October 2018, with data extracted for exports of *Loxodonta africana* from Zimbabwe to China during 2010 to 2018. Note that the most recent records date from 2016.

trophy. This lack of coherence indicates that domestic markets are poorly regulated and offer broad opportunities for laundering.

58. The tension introduced by the split-listing of African elephants, the apparent lack of effective control of existing legal markets and the expectation that legal trade may be introduced is a powerful combination of forces that seriously influences the global ivory market.

6.3 Parts and derivatives in trade

59. Ivory (raw tusks and worked), skin, leather, hair, meat and live specimens are all traded. The international trade ban is marked by many loopholes and ample room for evading its controls.

6.4 Illegal trade

60. Data on the illicit ivory trade reinforces and extends the reports of poaching from MIKE field sites. Seizure data from the CITES Elephant Trade Information System (ETIS) compiled by TRAFFIC and published in August 2018⁸¹ showed, in line with earlier reports, that ivory seized in illegal trade rose dramatically in 2009 and in 2013 was at its highest levels since ETIS records began in 1989. A 2014 report⁸² by TRAFFIC echoed these findings and highlighted the trade routes that had been focussed on West and Central Africa but had shifted to East Africa, particularly Tanzania and Kenya, as the primary exit points for illicit ivory leaving the African continent. Most ivory was destined for China, although Thailand is also a destination, and transit points have been identified in the Middle East (United Arab Emirates), Europe (Spain), Northern Asia (Turkey), Southern Asia (Sri Lanka) and Asia/Southeast Asia (Hong Kong, Indonesia, Malaysia, Viet Nam). Levels of illegal trade and seizures have remained at substantially high levels through 2017, the most recent year for which reasonably complete records are available. The TRAFFIC-ETIS report to SC70 noted that there are considerable difficulties with non-reporting of seizure data by CITES Parties, despite their obligation to provide information to the Secretariat or directly to TRAFFIC within 90 days⁸³. Measures are proposed for improving data acquisition and transparency in analysis, but the ultimate responsibility for a meaningful monitoring and reporting systems lies with the Parties to CITES.
61. A recent radiocarbon study⁸⁴ in 10 countries across Europe, of ivory presented for sale as legitimate, found that 74% of the ivory tested was in fact fake antique ivory being sold illegally. The most recent ivory tested in the study was dated from after 2010. European countries, including France, the Netherlands, Belgium, Italy and Germany remain transit points for raw and worked ivory and even places where raw ivory is transformed into carved ivory⁸⁵.
62. The report by TRAFFIC to SC70 in 2018 was nevertheless able to show, as reported in other ETIS assessments, that *"large-scale ivory seizures have played a crucial role in establishing the upward trend in illegal ivory trade and then stabilising it at record high levels over the last six years."* It also noted that there has been an apparent intensification of ivory processing in Africa for export of finished products to Asia, and that this changing aspect of the illegal trade needs more thorough assessment. This flexibility underscores the way criminal networks operate as "multi-product firms" that are more versatile in reducing costs through scale economies (as evidenced by large-scale seizures), changing the sites of processing from destination to source countries, and adapting their transport networks to take advantage of regulatory loopholes and law enforcement deficiencies when the opportunity arises. The capacity of crime syndicates to circumvent controls is buttressed by their ability to move in several markets at the same time. Their involvement in a range of criminal enterprises also allows them to maintain their profitability through all the phases of the business cycle. The complex, specialized, and transnational nature of African supply chains is well documented⁸⁶.
63. Given this complexity and the continuing threats posed by the ivory trading establishment, this proposal would restore all African elephants to Appendix I. We believe this would send a clear signal

⁸¹ CITES (2013) *Status of African elephant populations and levels of illegal killing and the illegal trade in ivory: A report to the African Elephant Summit. December 2013.* Prepared by CITES, IUCN/SSC African Elephant Specialist Group, and TRAFFIC International. Accessible at: http://cmsdata.iucn.org/downloads/african_elephant_summit_background_document_2013_en.pdf

⁸² Milliken, T. (2014) *Illegal Trade in Ivory and Rhino Horn: an Assessment Report to Improve Law Enforcement Under the Wildlife TRAPS Project.* USAID and TRAFFIC. TRAFFIC International, Cambridge, UK.

⁸³ CITES Resolution Conf. 10.10 (Rev. COP17) Trade in Elephant Specimens, Annex I section 4.

⁸⁴ AVAAZ (2018) *Europe's Deadly Ivory Trade.* Radiocarbon testing illegal ivory in Europe's domestic antique trade. AVAAZ in collaboration with University of Oxford and Elephant Action League.

⁸⁵ Robin des Bois (2016) *Surging European Union ivory exports.* 26 September 2016. Accessed at: <http://www.robindesbois.org/en/english-les-exportations-divoire-depuis-lunion-europeenne/>

⁸⁶ Milliken (2014), *op.cit.*; Vire, V. & Ewing, T. (2013) *Ivory's Curse.* Born Free US and C4ADS.

to the world that trade in ivory is unacceptable. Such an unambiguous message and clear regulatory measure would assist agencies with combating the illegal trade in ivory.

6.5 Actual or potential trade impacts

64. Although the sales of ivory were promoted as a source of revenue that would be used for elephant conservation, and as a means to satisfy – and thus reduce – demand for ivory, it appears that the opposite has occurred. There are no rigorous studies with hard data on the resources generated by legal trade that have been re-invested in elephant conservation. In any event, it is clear that the financial requirements of adequate conservation schemes are considerable and that the products of legal trade have been and will remain insufficient.
65. Poaching has increased, and most dramatically following the second one-off sale in 2008⁸⁷. Such sales give the false impression to consumers that ivory trade has been, or will be legalized. Maintaining exemptions for jewellery and carved ivory has a similar effect. These exemptions are another loophole through which illegal ivory may find its way to the final consumer. The trade in ekipas in Namibia is an example: it was reported in 2007⁸⁸ that the strict registration and certification system promised by Namibia at CoP13 to control trade in ekipas had not been implemented. To their credit, the Namibian government imposed a moratorium on ekipa trade in September 2008⁸⁹ as part of a moratorium on trade in worked ivory pending enactment of the Controlled Wildlife Products Bill in December 2008 (see section 7.1 below)⁹⁰. It is unclear, however, if the moratorium is still in effect.
66. At the same time, the growing strength of Asian economies, coupled with cultural values and state agencies' promotion of domestic markets⁹¹, has allowed this consumer demand to grow steadily, independently of ivory supply; the treatment of ivory markets as simple supply-demand systems is a risky simplification. The MIKE programme found that demand for legally traded mammoth ivory, taken as an indicator of demand for illegally traded ivory, was a strong predictor of the levels of illegal killing of elephants at study sites⁹². With increasing demand, prices soared, creating even greater incentives for poachers. Even if prices are reduced through a legal market, this may lead to increased demand that will end up pushing prices upwards again. These effects are characteristic of all short-term business cycles present in most markets. Multi-product firms (or criminal syndicates) can endure these cycles without too much difficulty, but the elephant populations may not be able to do so. Although there may be some anecdotal evidence of a drop in price of legal ivory, this reduction will not necessarily affect the level of operations of the illegal trade and thus poaching will continue.
67. It has been possible to establish clear links between specific events, such as stockpile sales and changes in the levels of illegal killing⁹³. The mechanisms behind the specific effects of such discussions on indices of consumer demand have not been studied, and it may be impossible to determine exact linkages. However, it does appear undeniable that the total ban on ivory sales in 1989 had the effect of rapidly and dramatically reducing the killing of elephants. Whereas the temporary nature of the 'moratorium' on proposals to trade in ivory from Appendix II elephant populations for nine years from 2008 is likely to have served as a signal to consumers that sales could be allowed after it ended in 2017. More importantly, it was likely to have signalled to traders and processors to maintain their levels of operation and even to engage in new investments. These market participants have an economic interest in acting to develop the market, not simply respond to it. As with any business enterprise, these traders are potent drivers of the market's expansion. Business history shows that markets are proactively promoted and developed by firms and government agencies⁹⁴.
68. China and the US agreed in September 2015 at Presidential level to "enact nearly complete bans on the import and export of ivory" and to take "timely and significant steps to halt the domestic commercial trade in ivory"⁹⁵. The US enacted the ban in June 2016, while China's ban went into effect

⁸⁷ CoP17, Inf. 96. *Ibid.* Hsiang, S. & Sekar, N. *Does Legalization Reduce Black Market Activity? Evidence from a Global Ivory Experiment and Elephant Poaching Data*. NBER Working Paper, June 2016.

⁸⁸ Reeve, R., Pope, S. & Stewart, D. (2007) *Ivory, Ekipa and Etosha. The Hidden Cost to Elephants and Rhinos of Namibia's Wildlife Policy*. David Shepherd Foundation, May 2007.

⁸⁹ <http://allafrica.com/stories/200808210652.html>

⁹⁰ <http://mg.co.za/article/2008-08-20-namibia-bans-ivory-trade>

⁹¹ <http://voices.nationalgeographic.com/2014/10/22/legalizing-ivory-trade-taking-to-new-heights-a-dangerous-policy-proposal/>

⁹² SC65 Doc 42.1

⁹³ CoP17 Inf. 96. *Ibid.*

⁹⁴ The studies by Alfred Chandler and the Business History Group at Harvard University corroborates this point. See Chandler, A. (1990) *Scale and Scope. The Dynamics of Industrial Capitalism*. Harvard University Press.

⁹⁵ <https://www.whitehouse.gov/the-press-office/2015/09/25/fact-sheet-president-xi-jinpings-state-visit-united-states>

between March and the end of December 2017 with the closure of all official ivory processing and sales sites⁹⁶. In January 2018, the Hong Kong SAR agreed to phase out its domestic ivory markets by the end of 2021, although there is concern that the delay will allow ivory sales to continue as markets shift from China⁹⁷.

69. In contrast, Japan's domestic ivory market remains open and was recently described by TRAFFIC as "one of the largest in the world"⁹⁸. An active carving industry and major regulatory loopholes have enabled unregistered ivory to be sold to manufacturers, including "significant quantities" that have been illegally exported to China⁹⁹. Japan has recently tightened its ivory control system, but significant loopholes in the amended domestic regulatory framework persist¹⁰⁰. TRAFFIC cites "considerable evidence to suggest it [Japan's domestic ivory market] is contributing to illegal trade" and has recommended that "legislative, regulatory and enforcement measures towards market closure" be taken¹⁰¹.
70. The EU banned the re-export of raw ivory for commercial purposes in July 2017¹⁰², but retains a major internal domestic market. In the absence of further action, some EU Member States, including France, Belgium and Luxembourg, have taken or announced steps to close their markets unilaterally, while the UK is passing a bill through parliament to ban commercial dealing in ivory in the UK subject to narrow exemptions¹⁰³.
71. The signal sent by restoring all African elephant populations to Appendix I would underpin the actions by China, Hong Kong SAR, the US, the UK and the EU to date, and is expected to have a strong dampening effect on demand and a significant effect on the expectations of traders and processors who are key drivers of the market for ivory. It is fully consistent with the precautionary approach to trade, as in Annex 4 of Resolution Conf. 9.24. This will bring about the desired objective of reducing illegal killing of elephants.

7. Legal instruments

7.1 National¹⁰⁴

72. **Botswana:** CITES entered into force in their legislation on 12 February 1978. The most relevant domestic legislation is the Wildlife Conservation and National Parks (Hunting and Licensing) Regulations (Section 92) 10th August 2001, and in particular Reg. 34/39/40/41, and the Wildlife Conservation and National Parks Act 1992 which implemented CITES. This has been assessed as Category 2 under CITES, not meeting all requirements for CITES compliance¹⁰⁵ although some amendments have been submitted for consideration. Penalties for offences include fines of \$300-\$6,000+ and imprisonment of up to 15 years. The penalties may, in addition, incur forfeiture of proceeds of crime. Under the legislation, hunting is permitted by license, with restrictions on where hunting may take place, which animals may be hunted, the type of weapon, and others, although there are exemptions and loopholes. There are restrictions on import/export/re-export of trophies. There

⁹⁶ CITES SC70 Inf. 19 Controls on domestic trade in selected Appendix I listed species part I: elephant ivory Annex: country profiles *an analysis of Domestic Controls in nine countries*, prepared by ELI p. 6

⁹⁷ Gibson, L., Hofford, A., Dudgeon, D., Song, Y., Chen, Y., Baker, D.M. & Andersson, A. (2018) Hong Kong's delayed ivory ban endangers African elephants. *Frontiers in Ecology and the Environment*, 16:378-380.

⁹⁸ Kitade, T. and Nishino, R. (2017). Ivory Towers: An assessment of Japan's ivory trade and domestic market. TRAFFIC. Tokyo, Japan. Executive Summary, p. V

⁹⁹ CITES CoP17 Doc. 57.6 (Rev 1.) Report on the Elephant Trade Information System (ETIS) prepared by the Secretariat. Annex. Milliken, T., F. M. Underwood, R. W. Burn and L. Sangalaku (2016). The Elephant Trade Information System (ETIS) and the Illicit Trade in Ivory: A report to the 17th meeting of the Conference of the Parties to CITES. p. 23

¹⁰⁰ Kitade, T. and Nishino, R. (2017). Ivory Towers: An assessment of Japan's ivory trade and domestic market. TRAFFIC. Tokyo, Japan pp. 6-7

¹⁰¹ Kitade, T. and Nishino, R. (2017). Ivory Towers: An assessment of Japan's ivory trade and domestic market. TRAFFIC. Tokyo, Japan pp. 6-7

¹⁰² http://ec.europa.eu/environment/cites/pdf/guidance_ivory.pdf

¹⁰³ DEFRA (2018) *Government confirms UK ban on ivory sales*. Department of Environment, Food and Rural Affairs, Foreign & Commonwealth Office, Ministry of Defence, and the Rt. Hon Michael Gove, MP. 3 April, 2018. Accessed at: <https://www.gov.uk/government/news/government-confirms-uk-ban-on-ivory-sales>

¹⁰⁴ For legislation in Namibia, South Africa and Zimbabwe, see DLA Piper (2015) *Empty threat 2015: Does the law combat illegal wildlife trade? A review of legislative and judicial approaches in fifteen jurisdictions*, in partnership with the Royal Foundation, available at <https://www.dlapiper.com/~media/Files/News/2015/05/IllegalWildlifeTradeReport2015.pdf>

¹⁰⁵ <https://cites.org/eng/legislation>

have been moratoria and/or bans on hunting over recent decades: elephant hunting was stopped in 1983 due to concerns that tusk weights were declining and populations were retreating inside protected areas, and reinstated in 1996 with prescribed quotas; lion hunting was stopped during 2001-04 and again from 2008 to present; and hunting of all wildlife was banned in January 2014 because of perceived population declines and corruption in the distribution of revenues.

73. **Namibia:** CITES entered into force on 18 March 1991. Their principal domestic legislation (Category 1, 'believed generally to meet the requirements for implementation of CITES') was the Nature Conservation Ordinance (4 of 1974), which established controls on the hunting of wildlife, including elephants as "Specially Protected Game", on both state-owned and private land. The Nature Conservation Amendment Act, No. 5 of 1996, gave community conservancies the same rights as freehold landowners over the conservation and management, including hunting, of wildlife. In December 2008, Namibia enacted the Controlled Wildlife Products and Trade Act, followed in 2011 by Regulations, that together update the penalties for offences which would contravene CITES and specify the requirement for permits for possession of domestic or international sale of ivory. The Namibian Government has drafted a Protected Areas and Wildlife Management Bill for proposed consolidation and reform of the existing legislation. This Bill has been in preparation since 2016 and it is to be subject to vote before becoming law during 2018. Forfeiture legislation applies.
74. **South Africa:** CITES entered into force on 13 October 1975. Legislative jurisdiction is split between national and provincial governments. South Africa's national legislation is classed as Category 1 by CITES. The most relevant legislation is the National Environmental Management: Biodiversity Act, 10 of 2004 (as amended), which put in place protection for threatened wildlife. It is supplemented by the Threatened or Protected Species Regulations 2007 and the National Norms and Standards for the Management of Elephants in South Africa (GN 251 (29/2/2008)). The CITES Regulations (R.173 in GG3302 2010, amended in 2014), began formal implementation only in 2010, establishing management and scientific duties related to environmental affairs, conditions for international trade, registration requirements for individuals trading specimens internationally, and creating offences and penalties. Penalties are doubled for second and subsequent offences and there is provision for imposing a financial penalty equating to three times the value of the animal if protected. Forfeiture legislation applies.
75. **Zimbabwe:** CITES entered into force in Zimbabwe on 17 August 1981. Its principal legislation (Category 1) is to be found in the Parks and Wildlife Act 1975, amended 22/2001. Zimbabwe's obligations under CITES in relation to the export and import of ivory were established through the Parks and Wildlife (Import and Export) (Wildlife) Regulations SI 76/1998, which link to Section 129 of the Act. Section 128 of the Act specifies substantial penalties relating to the illegal trading in ivory. It also specifically prohibits the killing or hunting of Specially Protected Animals. Elephants are not designated as Specially Protected Animals; thus, mandatory custodial penalties under Section 128 only apply to illegal trade in ivory, not to offences involving illegal killing or hunting of elephants. The Act incorporates specific forfeiture provisions. In addition, the Environmental Management Act 13/2002 addresses environmental protection, which outlaws the cyanide poisoning responsible for recent poaching of elephants in Zimbabwe.
76. It should be noted that deterrent sanctions imposed by countries where poaching or trafficking is rampant are often weakened by overly lenient judicial action, including the granting of bail and judgments leading to releases of charged traffickers. This inconsistency between legislation and judicial action poses a significant threat to elephant populations.

7.2 International

77. In 1989, a decision was taken at CoP7 to list African elephants in Appendix I of CITES as a result of the poaching crisis of the 1970s-80s. However, the species was subsequently split-listed when national populations from Botswana, Namibia and Zimbabwe were transferred to Appendix II in 1997, followed by South Africa in 2000.

8. Species management

8.1 Management measures

78. Management measures for elephants vary greatly throughout the continent. They range from creation of migration corridors and transfrontier parks and conservation areas (e.g. the Great Limpopo Transfrontier Park and the Limpopo-Shashe and Kavango-Zambezi Transfrontier Conservation Areas), translocation of animals, creation of artificial waterholes, fencing and deterring animals from

crops with, for example chilli peppers or beehives, to shooting of problem animals. Culling has not been employed as a management tool since Zimbabwe halted the practice in 1988 and South Africa in 1995.

8.2 Population monitoring

79. The ability of range States to monitor elephant populations varies greatly. The MIKE programme monitors populations and illegal killing at specific sites in several range States but is not intended to provide information on trends in total national or continental populations. The African Elephant Database stores data from elephant population surveys beginning in 1976. The most recent update of the database is the online 2013 African Elephant Database. The authors point out, however, that data quality varies considerably, depending, *inter alia*, on the methods used or the age of the data.

8.3 Control measures

80. The ability of range States to manage elephant populations, to regulate legal take, and to prevent poaching, varies greatly. A number of steps have been taken in recognition of the urgency for action to stem wildlife crime, involving not only elephants but also a wider range of species.
81. The report to SC66 in January 2016¹⁰⁶ describes a number of areas where efforts have been made to improve cooperation on the control of wildlife crime. At CoP16 in March 2013, Decision 16.78, paragraph a) called for the Secretariat to convene a CITES Ivory Enforcement Task Force. The Secretariat was not able to raise the funds necessary to convene such a Task Force, but its objectives were considered to have been partially/largely met through the development and implementation of National Ivory Action Plans (NIAPs) – see below – and targeted support from, and collaboration with partners from the International Consortium on Combating Wildlife Crime (ICCWC). The decision was taken at CoP17 to replace the idea of the Task Force with a meeting of Parties concerned by the development and implementation of NIAPs, in cooperation with ICCWC partner organizations and, as appropriate, other Parties and experts¹⁰⁷.
82. A range of International organisations have become increasingly engaged in tackling wildlife crime. The United Nations Office on Drugs and Crime (UNODC), on behalf of ICCWC, led the development of “*Guidelines for forensic methods and procedures of ivory sampling and analysis*”, which were finalized and released in November 2014¹⁰⁸ and were followed up with a global review of forensic laboratory capacity to inform a broader project of combatting wildlife crime that UNODC will implement. The Lusaka Agreement¹⁰⁹, with seven Parties and three additional signatories, came into force in 1996; the Lusaka Agreement Task Force (LATF) was set up to implement its objectives in 1999. Its objectives are to support the member states and collaborating partners in reducing and ultimately eliminating wildlife crime through facilitating cooperation in law enforcement, investigations, information exchange, and capacity building.
83. Through funding from the Secretariat, the World Customs Organization (WCO) organized a workshop on “Controlled Deliveries of Illegally Traded Wildlife Products” in Bangkok in January 2015, with follow-up training involving deployment of customs officers from China to Kenya and South Africa. Further activities are to follow. INTERPOL is implementing Project WAYLAY in close cooperation with its ICCWC partners, focusing its first phase on elephant ivory and rhinoceros horn. It aims to establish an international network of experts, harmonize procedures and develop guidance. The United Nations General Assembly (UNGA) in July 2015 unanimously adopted a Resolution on ‘Tackling Illicit Trafficking in Wildlife’, which calls upon Member States, *inter alia*, to make illicit trafficking in protected species of wild fauna and flora involving organized criminal groups a serious crime.
84. Resolution Conf. 10.10 (Rev. CoP17) urges Parties to maintain an inventory of government-held stockpiles of ivory and, where possible, of significant privately held stockpiles of ivory within their territory. On 23 January 2017, the Secretariat issued Notification to the Parties No. 2017/005 to remind Parties of the above reporting obligation. While some Parties have not yet complied, a number of other countries have inventoried and destroyed their stockpiles. At SC65, the Standing Committee encouraged all Parties in whose territory legal ivory markets exist or that export pre-convention raw

¹⁰⁶ SC66. Doc 47.1

¹⁰⁷ CoP17 Dec. 17.80

¹⁰⁸ https://cites.org/eng/ICCWC_guidelines

¹⁰⁹ <http://lusakaagreement.org/>

elephant ivory for commercial purposes, to provide wholesale price data on such sales of raw ivory to the Secretariat, for integration into MIKE and ETIS analyses.

85. In addition to these international efforts, the implementation of targeted National Ivory Action Plans (NIAPs)¹¹⁰ are intended to enhance the national implementation of CITES provisions. Eight Parties of "primary concern"¹¹¹, eight Parties of "secondary concern"¹¹², and three Parties of "importance to watch"¹¹³ in both the poaching of elephants (source countries) and the illegal trade in ivory (transit and end consumer countries) have been directed by the Standing Committee to develop and implement NIAPs. These countries are required to report their progress in NIAP development and implementation to the Secretariat. In addition, a number of countries, including South Africa and Japan, are being monitored by the Secretariat and were requested to report to SC70¹¹⁴.
86. The African Elephant Action Plan (AEAP) was approved by African elephant range States in 2010 at CITES CoP15, and the African Elephant Fund was established to support the implementation of the AEAP¹¹⁵. International donors and range States are encouraged to back this initiative, through technical and financial support, and National Elephant Action Plans (NEAPs) are being developed as a result.
87. The Elephant Protection Initiative (EPI)¹¹⁶ was launched in 2014 by Botswana, Chad, Ethiopia, Gabon and Tanzania, with the intention of bringing African Elephant range States, non-range States, intergovernmental organisations, NGOs, private sector and private citizens together to work in partnership to protect elephants and stop the illegal ivory trade; five additional range States have now joined. Activities include support for the development of NEAPs, as well as domestic legal frameworks and international actions limiting the ivory trade at both demand and supply ends of the chain, inventory and destruction of ivory stockpiles, education and fund-raising.
88. Despite these many efforts, the rate of elephant killing has remained high. The relative failure of efforts to date may be attributed to the scale of the problem of combatting well-organised international criminal networks. The coordination at different levels should be sustained and strengthened.

8.4 Captive breeding and artificial propagation

89. Captive breeding presents no direct benefit to *in situ* conservation of African elephants¹¹⁷ and is therefore not relevant to this proposal.

8.5 Habitat conservation

90. African elephants occur in a number of protected areas, but these account for only 31% of their range; almost 70% of the species range is believed to lie outside protected areas¹¹⁸.

8.6 Safeguards

91. These are not applicable since the proposal would result in the listing of all African elephants in Appendix I.

9. Information on similar species

92. The Asian elephant (*Elephas maximus*) has been listed in CITES Appendix I since 1976. The 2018 report by IUCN/SSC and MIKE to SC70¹¹⁹ noted that there are still problems with the reliability of estimates of elephant numbers and of poaching rates in Asian elephant range States. However, it also reported that recent meetings of the Asian Elephant Specialist Group (AsESG) and the MIKE programme have recognised the importance of assessing and improving the quality of data on

¹¹⁰ SC66 Doc. 29 (Rev.1). *National Ivory Action Plans Process*.

¹¹¹ China – including Hong Kong SAR, Kenya, Malaysia, the Philippines, Thailand, Uganda, the United Republic of Tanzania, Viet Nam.

¹¹² Cameroon, Congo, Democratic Republic of the Congo, Egypt, Ethiopia, Gabon, Mozambique, Nigeria.

¹¹³ Angola, Cambodia, Lao People's Democratic Republic.

¹¹⁴ SC69 Summary Record <https://cites.org/sites/default/files/eng/com/sc/69/sum/E-SC69-SR.pdf>

¹¹⁵ CoP15 Inf. 68, *African Elephant Action Plan*.

¹¹⁶ <http://www.elephantprotectioninitiative.org/about/>

¹¹⁷ https://www.iucn.org/about/work/programmes/species/who_we_are/ssc_specialist_groups_and_red_list_authorities_directory/mammals/african_elephant/statements/captive_facilities/

¹¹⁸ Blanc *et al.* (2007) *African Elephant Status Report*.

¹¹⁹ SC70 Doc 49.1, Annex 1.

elephant population trends and conservation threats, and have established a basis for collaboration through a Working Group on seeking synergies in data collection and sharing between the two endeavours. The European Union has pledged new funding support for MIKE activities in Asia.

93. The report to SC70 notes that, while the main threats to elephants in Asian countries come from habitat loss, degradation and fragmentation in relation to the steadily growing demands by human land use, there is evidence of increasing levels of poaching for ivory, particularly in Cambodia and Myanmar, and it continues to be a problem in other countries, for example in India.
94. Poaching for ivory and illegal trade remains a threat to the small and fragmented populations in many Asian countries. As only male Asian elephants carry tusks and the sex ratio of many populations has been skewed through selective poaching in the past, increased demand for ivory will have a particularly devastating effect. In Myanmar, there is an emerging threat posed by the illegal killing of Asian elephants for their skins that adds to pressure on populations from ivory poaching.
95. The Asian elephant would therefore benefit from a comprehensive Appendix I listing for both species, and it would improve the prospects for enforcement coordination between African and Asian elephant range States in combatting illegal trade.

10. Consultations

96. This proposal was sent by the CITES Management Authority for Kenya to the Management Authorities of Botswana, Namibia, South Africa and Zimbabwe on 10 December 2018 to seek their comments.
97. The comments received are summarized in the table below:

Comments on Appendix I proposal by Botswana, Namibia, South Africa and Zimbabwe

Comments	Botswana	Namibia	South Africa	Zimbabwe
1. Biological criteria for uplisting are not met.	Biological criteria in Resolution Conf. 9.24 (Rev CoP17) are not met. The Proposal fails to make a case for uplisting in Botswana. It rightly states that reduction in numbers could actually be due to different methodologies, but it discusses carcass ratios in Angola and Zambia as if they were in Botswana. The Proposal says PIKE values in southern Africa have reached 0.48 – this is not reaching the threshold (0.5). Chobe is Botswana's only MIKE site and its PIKE value is 0.21, so poaching in Botswana remains under control. Increase in ivory possessed by BDF does not necessarily come from poaching, as elephants die in	Namibia's African elephant population does not meet the biological criteria for Appendix I as listed in Annex1 of Res Conf.9.24 (Rev CoP17).	The South African population of the African elephant, <i>Loxodonta africana</i> , does not meet the biological criteria for inclusion in Appendix I. The decline for southern Africa is noted as 5% from 2006 – 2013 which although it is a decline may not be a marked decline. From a continental perspective there are grounds for an Appendix I listing, but not if populations of individual countries are considered separately.	Zimbabwe's elephant population does not meet the CITES Scientific criteria for species listing in Appendix I.

Comments	Botswana	Namibia	South Africa	Zimbabwe
	droughts/ dry seasons. Discrepancies between export and import records occur because different recording methods are used. It is a minor issue that requires cooperation between States and should not be used as justification for uplisting.			
2. Appendix I is seen as a restriction imposed by other countries that have their own problems; Appendix II is correctly applied	Trade is allowed by countries in Appendix II. CITES should not punish those who have expended great effort to conserve wildlife. Conservation of the continent's largest elephant population comes at great cost to Botswana government. Management regimes should not be imposed by other countries which have seen their elephant populations plummet.		The elephant population of South Africa is well managed and all activities related to elephant are regulated through the National Environmental Management: Biodiversity Act 10 of 2004 (NEMBA). The current listing (Appendix II) is consistent with the listing criteria applicable for the population of South Africa.	Our populations are correctly listed under Appendix II. The Proposal lacks justification for placing healthy populations in Zimbabwe and other range States of southern Africa in the same category as populations in West, Central and East Africa.
3. Protection of elephants from illegal killing should be based on cooperation and correct identification of threats & causes	The Appendix I proposal is based on assumption, not facts. Assumes that uplisting will accord maximum protection but no evidence. Contrary may apply: a total ban on legal trade may stimulate greater demand for illegal ivory.	Namibia does not contest that illegal killing is happening throughout elephant range. Elephant range States and the CITES community should focus on ideas of how to overcome the problems of illegal killing of elephants and ways to improve law enforcement in our own countries.		African elephant conservation will benefit from appreciating that contexts are different with different measures applied in different States at various scales. Appendix I is not a pancea for threat reduction.
4. Human wildlife conflict and conservation incentives,	Elephant numbers have increased, so that they have extended range to areas unoccupied previously and there is a big increase in HWC cases, including increase in human mortality.	Uplisting the Namibian African elephant will have a negative impact on its population. The species will be seen as a liability than an asset as it will provide limited conservation incentive.		Uplisting would not benefit communities living in elephant range. Uplisting would not benefit elephants. Densities in 80% of elephant range are above ecological carrying capacity. Removing any management measure

Comments	Botswana	Namibia	South Africa	Zimbabwe
				out of the toolbox is not in Zimbabwe's interest.
5. Factual points should be corrected	Under 4.5, incorrectly presented geographic extent of elephant range in Botswana: - Tuli Block is not in southern Botswana (eastern B?) - range extends through CKGR into Ghanzi and Kweneng, near to Gaborone			

98. The responses received are reproduced in Annexes 1 to 4 to the present proposal.

11. Additional remarks

99. The full biological criteria are comfortably met if all African elephant populations are considered as a whole. While individual country populations may be listed separately in Appendix II under the listing criteria in Resolution Conf. 9.24 (Rev. CoP17), the Resolution cautions against split listing, stating: "Listing of a species in more than one Appendix should be avoided in general in view of the enforcement problems it creates". Moreover, the Convention clearly envisages that listed species will have a single status under CITES. The AESR 2016 shows there has been a decrease in elephant numbers for the first time across southern Africa, including in 3 of the 4 Appendix II countries. The PIKE value for the whole of southern Africa is 0.48, which is very close to the 0.5 threshold. The level of threat is clearly increasing across the region, and while numbers in Namibia may have increased, since surveys were not coordinated with Botswana, which showed a decrease, it is possible that both populations decreased. As well as the enforcement problems caused by mixed listing, trade or the prospect of trade by any range States will stimulate demand in consumer countries that puts pressure on the elephant protection agencies. A unified Appendix I listing will help to relieve that pressure and provide the greatest protection for the African elephant across its range. We recognize the importance of conservation incentives for local communities; however, the success of community-based conservation is not dependent on international ivory sales, which are not necessary for further development of community engagement in wildlife-related benefit-sharing and protection from illegal trade.
100. It is highly questionable whether the ivory trade is an economically sustainable way to utilize elephants and whether revenues from the trade in ivory have made any contribution to elephant conservation. The high costs involved in policing the trade seem to exceed the potential benefits by far. These include monitoring costs for MIKE and ETIS, increased costs for anti-poaching and national law enforcement, technical missions to exporting and importing countries and so on. At the national level, the collective annual net revenue from ivory stockpile sales is reported to be small when compared to the costs involved, including for ivory storage, and compared to revenue from other sources.
101. While there have been substantial improvements in control measures aimed at breaking the supply chain for illegal ivory, it remains more important than ever to reduce the demand at the consumer end. This is incompatible with a partial trade in ivory, or leaving the door open for its resumption at a future date. A unified approach, listing all of Africa's elephants in Appendix I, sends a clear signal to consumers and criminal syndicates that international ivory trade is, and will remain, prohibited. Trade in hunting trophies would continue to be allowed (with the appropriate permit) under the full Appendix I listing proposed in this paper.

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Annex 1

TELEPHONE: 3971405
FAX: 3912354
TELEGRAMS: GAME GABORONE
REFERENCE:



REPUBLIC OF BOTSWANA

DIRECTOR OF WILDLIFE & NATIONAL PARKS
P.O. Box 131
GABORONE

17th December 2018

PLEASE ADDRESS ALL OFFICIAL COMMUNICATIONS TO THE DIRECTOR

WP/MAN 13/6/2 IX (116)

Dr Patrick Omondi
CITES Management Authority for Kenya

Dear Sir/Madam,

Re: Objection to Kenya's Proposal

Thank you for your correspondence on the proposal to uplist the African elephant, *Loxodonta africana* to CITES Appendix I.

We wish to inform you of Botswana's strongest objection to your proposal. Firstly your proposal to uplist the elephant is based on assumptions rather than on actual fact. You have deliberately assumed that uplisting the elephant to Appendix I will accord it maximum protection and you have not provided any justification. Actually the contrary may apply where uplisting to Appendix I where there is a total ban on the legal trade may actually stimulate greater demand for illegal ivory.

Going through your proposal we note with concern your failure to make a case for uplisting of the Botswana population. You have rightly stated that the observed differences in our populations may be due to the use of different methodologies, however you conveniently go on to discuss the observed carcass ratios in other countries namely Angola and Zambia as if they were observed in Botswana.

Under section 4.5, you also misrepresented the elephant geographic extent in Botswana. For your information Tuli Block where we have more than 1 000 elephants is not in southern Botswana and please note that the elephants in Botswana have extended their range to the extent that they are now found in the Central Kgalagadi Game Reserve in Ghanzi District and also Kweneng District not far from the capital Gaborone.

You have stated that the PIKE values for Southern Africa have now reached 0.48 thereby admitting that the threshold has not been reached. The PIKE values for the Chobe National Park which is our only MIKE site are at 0.21 and surely these should be clear indication that poaching in Botswana is remains under control. Further please note that the increase in ivory in the hands of the BDF is not necessarily poaching as there cases where animals suffer drought induced mortalities in the dry season.

You have stated under paragraph 54 that the CITES policy is being "pulled in different direction" allowing trade by Appendix II species. It is our understanding of the CITES Convention that commercial trade is permitted for species in Appendix II. The Convention can and should not be used to punish those who have expended great effort to conserve their wildlife. The discrepancies in export and import records simply shows that parties record specimen differently and surely this cannot be used as a justification for uplisting the elephant. It is a minor issue that requires the coroperation of member states trading with one another to solve amicably.

Finally please be informed that our elephant numbers have been increasing over time to the point where they have even extended their range to areas where they were previously not observed. This has resulted in an exponential increase in cases of human wildlife cases. Lately there has been a steady increase in human mortalities by elephants. Conservation of the continent's largest elephant population comes at a great cost to the government of Botswana. It would be counter-productive for others to impose management regimes that have actually seen elephant numbers plummet in many parts of the continent.

In conclusion we strenuously oppose any attempt to uplist the elephant population of Botswana to Appendix I as they certainly do not meet the criteria listed in Res Conf 9.24 (Rev. CoP17).

Yours faithfully,

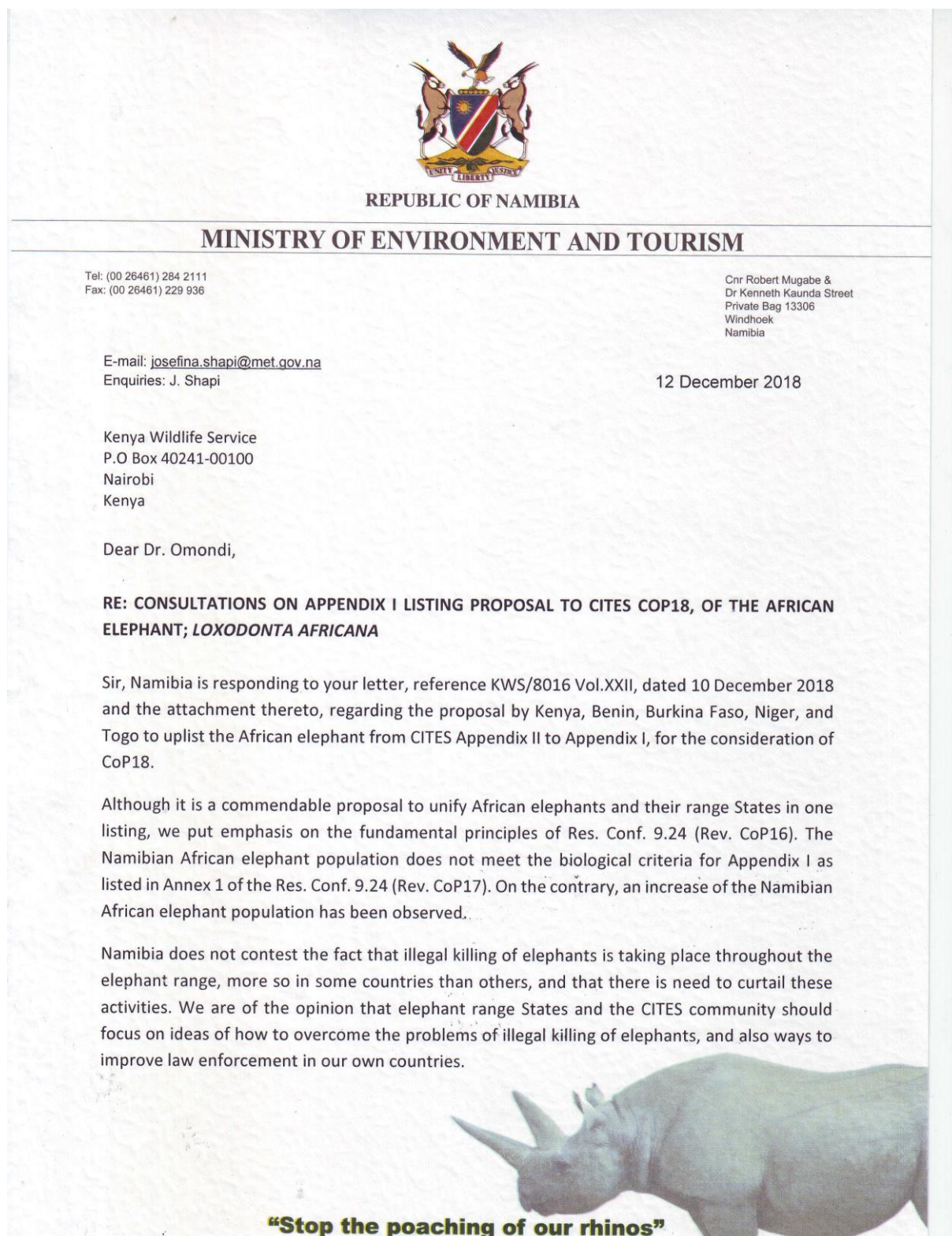
A handwritten signature in blue ink, consisting of a large 'C' followed by a horizontal line and a small flourish.

Cyril Taolo/**for Director**

Our Vision: *To protect the environment; Conserve the country's renewable and natural resources; Derive value out of environment for the benefit of Botswana*



Annex 2



It is argued that uplisting the Namibian African elephant will have a negative impact on its population. The species will be seen as a liability than an asset as it will provide limited conservation incentives. Therefore, we oppose the proposal by Kenya and aforementioned Parties to transfer African elephant from CITES Appendix II to Appendix I.

Nonetheless, we express our sincere gratitude for consulting us on this matter.

Yours sincerely,


T. Nghitla
Acting Permanent Secretary
Office of the
PERMANENT SECRETARY
REPUBLIC OF
NAMIBIA

17-12-2018

17/12/18

Annex 3

RESPONSE TO APPENDIX I LISTING PROPOSAL TO CITES COP18, OF THE AFRICAN ELEPHANT (LOXODONTA AFRICANA)

Although it is true that there has been a decline at a continental scale, it is certainly not true for each of the range states. Botswana, Namibia, South Africa and Zimbabwe now represent 56% of the continental total because of “more dramatic declines in the other regions” i.e. not in the Appendix II countries regions. The decline for southern Africa is noted as 5% from 2006 – 2013 which although it is a decline may not be a marked decline. From a continental perspective there are grounds for an Appendix 1 listing, but not if populations of individual countries are considered separately.

The South African population of the African elephant, *Loxodonta africana*, do not meet the biological criteria for inclusion in Appendix I. The South African elephant population is estimated at 28,168 (at the end of 2015) elephants distributed across seven of the nine provinces in 87 reserves, parks and protected areas. The elephant population has increased with approximately 89% between 2001 (15,744) and 2015 (28,168). The Greater Kruger area hosts 78% (21,657 elephants) of the total South African population. Similarly this population has also steadily increased since 2001 (12,924 elephants). Regular elephant counts are conducted on the majority of national and provincial reserves. These counts are well replicated, yielding results with good confidence intervals around the estimates. There are currently no major threats facing wild elephant populations in South Africa. Poaching in Kruger National Park has escalated from three elephant in 2013 to 19 to 68 in 2017, but remains low (0.3% of Greater Kruger population) and at sustainable levels. Increased security and enforcement measures have been implemented to increase the protection granted to elephant within Kruger National Park.



The elephant population of South Africa is well managed and all activities related to elephant are regulated through the National Environmental Management: Biodiversity Act 10 of 2004 (NEMBA), specifically the Threatened or Protected Species Regulations (TOPS Regulations), the National Norms and Standards for the Management of Elephants in South Africa (Government Gazette no. 30833) and respective provincial conservation legislation. In accordance with the National Norms and Standards for the Management of Elephant in South Africa, both state-owned and private properties with elephant are required to submit an elephant management plan to the relevant provincial Management Authority.

The current listing (Appendix II) is consistent with the listing criteria applicable for the population of South Africa.

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

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Harare

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*All correspondence to be directed to **Director General***

Ref:
17 December 2018

Dr P.Omondi

CITES Management Authority-KENYA Nairobi
Email : kws@kws.go.ke , cites@kws.go.ke

Dear Sir

RE: Feedback on Consultation for Appendix I Listing Proposal-African Elephant, CITES CoP18

Zimbabwe acknowledges receipt of your proposal shared on behalf of the African Elephant Coalition that is mainly comprised of elephant range states with declining elephant populations, a situation which is very different from our context. The proposal is unfortunately lacking in scientific rigour and convincing justification why our healthy elephant populations in Zimbabwe and other ranges states in southern Africa should be put in the same category as if they are facing the same level of threats as those in East, West and Central Africa.

Zimbabwe has a comprehensive Elephant Management Plan (2015-2020) and range- specific management plans for spatially-explicit intervention measures that are currently under implementation. We also recently completed review of our Communal Areas Management Programme for Indigenous Resources to diversify and strengthen our model which is premised on the principle of sustainable utilisation of our wildlife resources, including the African elephant. Uplisting of our elephant population will not benefit Zimbabweans living with this resource and it will certainly

not benefit our elephant population. Our elephants densities in 80% of our elephant range exceed the ecological carrying capacity, therefore removing any management measure out of our toolbox (which can be necessitated by CITES Listing) is not in our interest.

We strongly believe **our elephant population does not meet the CITES Scientific criteria for species listing in Appendix 1** and we kindly request you to exclude our elephant population from your proposal. Such listing will not solve the conservation challenges faced by our governments in pursuit of elephant conservation, it may actually jeopardise all good progress made in Zimbabwe and the range states in southern Africa.

Zimbabwe wishes to take this opportunity to extend an invitation to Kenya and other proponents of the proposal to visit Zimbabwe so that you may understand the facts about our elephant population status. We believe if we can have the opportunity to share our realities on the ground, you will appreciate why our populations are correctly listed under Appendix II and they are not qualified candidates for Appendix 1 listing. If we can appreciate that our contexts are different and therefore we are bound to employ different measures at various scales, we will yield dividends of successful elephant conservation on the African continent. Appendix 1 listing of elephants is not on the solution matrix for us and not a panacea for threat reduction. We are looking forward to hosting you before CITES CoP18 and working with you on the implementation of the African Elephant Action Plan.

Lastly, the proposal is also not in tandem with the spirit of collaboration and support in the proposed Memorandum of Understanding between the Government of Kenya and the Government of Zimbabwe that our government recently received from your Ministry.

Sincerely,

F.U Mangwanya

DIRECTOR GENERAL

CC: CITES Management Authority of Zimbabwe
CITES Scientific Authority of Zimbabwe
Permanent Secretary-Ministry of Environment, Tourism and Hospitality Industry