

**TRAFFIC Recommendations on Proposals
to Amend the CITES Appendices:
African Elephants**

CoP15 Prop. 4 [United Republic of Tanzania]

Transfer the population of African Elephant *Loxodonta africana* in Tanzania from Appendix I to Appendix II

Drawing upon the report by the Panel of Experts for Tanzania (CoP15 Doc. 68 Annex 6a), TRAFFIC is satisfied that, overall, Tanzania's elephant population is widespread, very large – indeed, the second largest in Africa – demographically healthy and presently viable.

Tanzania's monitoring programme for elephants is effective, professional and generally represents a very high standard not just in Africa but within a global context, although there is room for improvement, for example, with respect to implementation of the MIKE standards for aerial surveys. The current level of legal off-take from trophy hunting and problem animal control falls within sustainable limits. At the same time, it is appreciated that Tanzania's elephant population faces growing risks to its mobility owing to the expansion of human settlement and increasing human elephant conflict. TRAFFIC also recognizes that elephant conservation requires the constant allocation of substantial financial and human resources on the part of the Tanzanian Government and we commend the serious commitment to elephant conservation made to date.

The Panel of Experts report does, however, raise some issues of concern which TRAFFIC can not ignore. In the face of escalating volumes of ivory illegally leaving Tanzania and increasing poaching in the Selous-Mikumi ecosystem as evidenced by MIKE data, there appears to have been a decreasing law enforcement effort in recent years. The ETIS data show that Tanzania has been implicated in an increasing number of large-scale ivory seizure events, which have involved between 1 and 5.6 tonnes of ivory at a single time, all but one of which were seized abroad by other countries. It is appreciated that the wildlife authorities do not hold the mandate to police Tanzania's borders and ports, so it is very discouraging to note that the "Customs authorities declined to meet the Panel", as collaborative, inter-agency co-operation is essential to inhibit illicit trade in ivory. It is also of concern to learn that there is a low prosecution rate and sentencing for ivory trade crime cases and that eight large-scale ivory seizure cases still remain to be prosecuted. Finally, the fact that legislation in Zanzibar is inadequate to control trade in elephant specimens is an impediment to effective law enforcement.

Although the circumstances may be unfortunate rather than culpable, ivory stock management is also a matter of concern and it is regrettable to note that the origin of 42% of the ivory tusks and pieces under the control of the Wildlife Division lack source documentation.

CoP15 Prop. 5 [Zambia] *Loxodonta africana*

Transfer the population of African Elephant *Loxodonta africana* in Zambia from Appendix I to Appendix II

With reference to the report by the Panel of Experts for Zambia (CoP15 Doc. 68 Annex 6b), TRAFFIC accepts that Zambia's elephant population can be considered stable and viable, and may possibly be increasing, but recognizes that monitoring capacity is limited and donor-dependent at this time. If better resourced in the future, more systematic elephant population monitoring is an issue for improved performance by Zambia in the future. Overall, both legal off-take for trophy hunting and problem animal control and illegal off-take in the form poaching remain within sustainable limits. TRAFFIC is concerned, however, by the finding that illegal off-take of the elephant population in the Lower Zambezi on the border with Zimbabwe is unsustainable and that that population may be decreasing. Taken as a whole, however, the Panel notes that "Zambia has greatly improved its anti-poaching activity".

It is appreciated that elephants cause fairly extensive crop damage and sometimes loss of life in Zambia, and that the survival of elephants in many Game Management Areas (GMAs) "depends on the efficacy of mitigation of human elephant conflicts coupled with meaningful and timely disbursements of community benefits and active community involvement and participation in dealing with these problems", according to the Panel of Experts report. It is, therefore, commendable to note that the Government of Zambia has disbursed more than USD6 million in 35 GMAs since 2005, at a time when resources for conservation have generally been scarce.

TRAFFIC is also pleased to note that, in terms of ivory stock management, the Panel noted major improvements since the Panel of Expert's report in 2002. Indeed, it is pleasing to see that there has been "a positive trend in relation to many of the factors assessed since the last Panel report have improved, including the status of elephants, population monitoring, ivory management and law enforcement".

Comment on Ivory Trade

A special comment about trade in ivory is necessary. TRAFFIC is very concerned that the two monitoring systems under CITES, ETIS and MIKE, are both delivering results into this Conference of the Parties that show a serious escalation in illegal trade in ivory and an overall upward trend in the illegal killing of elephants, especially in the Central African region. Whilst there may be some uncertainty concerning all of the factors and relationships that drive illegal trade in ivory, it is extremely disappointing to note that little progress is being made to address the two prominent factors that correlate most strongly with illicit ivory trade in the ETIS analyses. Firstly, unregulated, domestic ivory markets in Africa and Asia remain potent drivers of the illegal killing of elephants. Decision 13.26, the '*action plan for the control of trade in African elephant ivory*', is not doing the job it was meant to do as many of the same countries with large, unregulated ivory markets continue to be identified in the ETIS analyses repeatedly. Secondly, the increasing frequency of large-scale ivory seizures suggests that organized criminal networks, often with strong links to Asian countries, are becoming progressively more involved in the trade. Addressing this emerging driver of illicit trade effectively calls for law enforcement resource allocation and capacity enhancement in African

elephant range States and the development of strong collaborative and cooperative linkages between African and Asian law enforcement institutions.

TRAFFIC does not believe that the evidence provided in ETIS demonstrates a linkage between illegal trade in ivory and one-off ivory sales under CITES. But TRAFFIC equally believes that it would be highly imprudent to allow further ivory trade at this time without having the confidence that the factors driving illicit trade and elephant killing highlighted in the ETIS and MIKE analyses will be addressed in a substantive manner under CITES. TRAFFIC would like to see decreasing trends in illicit trade in ivory and in the illegal killing of elephants before any further controlled, legal ivory trade under CITES transpires.

Recommendations

Resolution Conf. 10.9 states that: "*for the purpose of deciding on the transfer of a population of the African elephant from Appendix I to Appendix II and the necessary conditions to be attached to such a transfer, the Parties shall take into account the report of the Panel of Experts and in particular:*

- i) the status of the elephant population in the affected range State;*
- ii) the affected range State's ability to manage and conserve its population effectively; and*
- iii) the affected range State's ability to control trade in elephant ivory"*

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TRAFFIC believes that Tanzania generally satisfies the first two requirements, although a number of issues have been identified which require serious attention, but is not convinced that the ability to control trade in elephant ivory is sufficient at this time for the reasons noted above.

Reject

CoP15 Prop. 5 [Zambia] *Loxodonta africana*:

TRAFFIC finds it commendable that Zambia has taken positive steps to improve elephant conservation in the country over the last eight years and believes that it generally satisfies all of the requirements for transfer to Appendix II:

Accept, but do not allow trade in ivory at this time.