

RETTET DIE ELEFANTEN AFRIKAS e.V.



Positions and Recommendations

to Proposals and Documents for CITES CoP17 in Johannesburg 2016 Referring to African Elephants (*Loxodonta africana*)

Proposal/ Document No. Handed in by	Subject	Recommendation REA
Proposal No. 14 Namibia	Free trade with elephants and ivory without any restrictions for Namibia	reject
Proposal No. 15 Namibia and Zimbabwe	Unconfined trade with elephants and ivory for Zimbabwe	reject
Proposal No. 16 12 African Countries (AEC) and Sri Lanka	Place all populations of the African Elephant on CITES Appendix I , i.e. the elephant populations of Botswana, Namibia, South Africa, and Zimbabwe which are presently in Appendix II shall be included in Appendix I.	approve
Working Document No. 29 Kenya	Improved control of cyber crime and international cooperation against the illegal wildlife trade	approve
Working Document No. 38 Israel	Trade with mammoth ivory shall be regulated and the closing of national markets shall be considered (due to the likelihood of confusion with elephant ivory)	approve
Working Document No. 57.2 10 African Countries (AEC)	Closing of all national ivory markets worldwide, for raw and carved ivory	approve
Working Document No. 57.3 7 African Countries (AEC)	Ivory stockpiles shall be inventoried better and documented yearly. Recommendation of the destruction of all ivory stocks.	approve
Working Document No. 57.4 7 African Countries (AEC)	Trade in live elephants shall be restricted to in situ conservation purposes, i.e. elephants shall be moved only within their own country or range habitat.	approve
Working Document No. 84.2 8 African Countries (AEC)	The discussion of the development of a trade system for ivory (DMM) shall be ceased for good.	approve
Working Document No. 84.3 Namibia, South Africa, Zimbabwe	The discussion of the development of a trade system for ivory (DMM) shall be continued with modifications.	reject

The situation of the African elephant is alarming. The big killing continues unabatedly, the populations are dwindling at breakneck speed. The survival of the gray giants is highly dependent on the decisions at the upcoming conference of the parties to CITES CoP17.

Proposal Listing of all Elephants in Appendix I

The proposal of the African Elephant Coalition (AEC) demands that the elephant populations of Namibia, Zimbabwe, South Africa, and Botswana which are in CITES Appendix II so far, be included in the increased protection status of Appendix I, which the elephants throughout the rest of the world are already in.

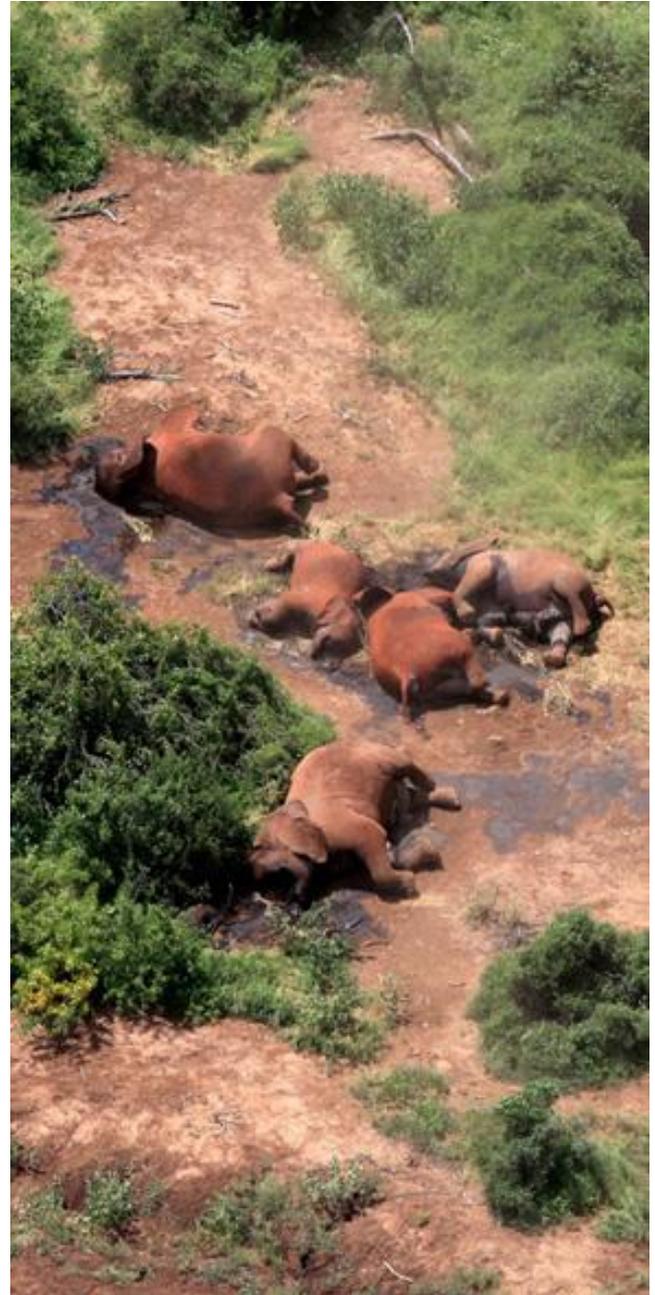
If the elephants of the a.m. four countries will continue to be permitted in Appendix II listing, the prospects will arise on restarting future ivory trade after the moratorium in 2017. This would cost many more elephants' lives, because studies showed that even the anticipation of future ivory trade is fueling poaching.

In the Cotonou Declaration the 29 states of the African Elephant Coalition have agreed to support the listing of all populations on Appendix I. The proposal is therefore clearly backed by the majority of the African countries.

The criteria for Appendix I are more than realized. Point C of CITES Resolution 9.24 (Rev. CoP16) is about "a significant decline in population in the wilderness by 50% or more in three generations". With elephants this is a period of 75 years.

In 1980 approximately 1.2 million elephants lived in Africa. In 2013 there were, according to the IUCN African Elephant Specialist Group, only 401,000 – 479,000. This represents a decrease of 61 to 66% in 33 years or 1.3 elephant generations.

In 1940 there were approximately 3 to 5 million African elephants. Thus over three elephant generations (75 years) a dramatic decrease of 84 to 92% happened.



Considering the populations of countries separately does not make sense since elephants migrate and do not stop at national borders.

Particularly clear and tragic, this is shown on the situation in Angola and Namibia: The KAZA area is used by 60% of all African elephants. They consist of mixed populations of all neighboring countries, inter alia, Angola. In Angola itself the Great Elephant Census

recently counted 3,400 elephants only - of those 200,000 that had been living there in the 70s. It is incomprehensible that these last, troubled animals, driven by fear, are placed under a lesser protection, when they flee from poaching southward into neighboring Namibia (an Appendix II country). At the end they might possibly be attributed to the "good elephant management" of this country.

We also wish to take this opportunity to point out two special elephant populations: the last 350 desert elephants in Mali / Gourma that are significantly threatened according to the MIKE report, and the desert elephants in northwestern Namibia, whose small population (about 180 animals) is under fire by trophy hunters besides by the human-wildlife conflict.

Poaching threatens all elephants. Currently, some countries may be less affected - this may, however, change quickly.

Between 2010 and 2012, according to PIKE, about 100,000 elephants were poached. Recent figures suggest that poaching continues unabatedly, specially in areas that were previously less affected. Regions such as the Selous (an area approximately 80% of which are managed by hunting concessions) have left only 13,000 of the former 100,000 elephants.

The criminal poaching gangs have transferred their actions to other regions (Ruaha-Rungwa, Mozambique and Zambia).

It is obvious that poachers are initially active where they encounter less resistance and at the same time find high elephant populations - such as in Tanzania.

The slaughter has, however, already begun in southern Africa.

Rising poaching and declining elephant numbers are increasingly reported from this area of Africa. Evidence is provided in the MIKE report in document CoP17 Doc. 57.5 which tells that the escalating poaching of elephants is a cause of great concern in the Krüger National Park.

This also applies to many areas in Zimbabwe. The MIKE report refers to dramatic discoveries in the Chewore area.

Furthermore, investigations in Zimbabwe showed that in the northern core areas of elephants the population numbers have declined by 40 to 75% since 2001 - in total by 6% in Zimbabwe. Reports of waterholes poisoned with cyanide and of unsecured ivory depots are also worrying.

There are reports of increased poaching in Namibia, too. More than 230 elephants have been poached since 2011. The illegal ivory trade is getting an increasingly sinister relevance. This year 37 elephants have already been killed.

Experience over many years has shown that an effective protection against poaching on site is not fully possible.

There is no argument why the elephants of the four southern African countries must necessarily remain on Appendix II - except if further ivory sales are taken into consideration in coming years.

However, this must not happen again, because any legal ivory trade stimulates illegal trade as well.

Former experience has shown the fatal implications of the legal 'one-off sales' - also from countries the elephant populations of which have still been stable, - and how much they have fueled poaching in other parts of Africa.

Studies by IFAW and Save the Elephants report a strongly expanding ivory trade after these 'one-off sales', especially in China. Among others, demand rose because the trade was legal. The increase in poaching and smuggling is associated, which is evidenced by the ETIS/TRAFFIC reports about the increasing amounts of ivory seizures.

Those previous attempts to sell ivory stock legally in order to stop poaching apparently failed as a recent study from Princeton/Berkeley shows: Ivory trafficking has

increased by 71% since the one-off sales in 2008.

The ivory trade of any country threatens the elephants of all countries.

The implementation of the argument, revenue from the legal sale of ivory or live animals would be channeled into the protection of species, is doubted by experts.

In our opinion, the risks of split-listing play a major role on the ivory market. The CITES criteria, too warn of the consequences of listing a species in two different appendices.

Listing all elephants in Appendix I sends the highly essential message about the general and permanent ban of the ivory trade, a clear signal to stop any trade in ivory worldwide. By this there are clearly no exceptions and gray areas any more, and the enforcement of the prohibition is significantly simplified. Experts believe that the prospect that in the foreseeable future there would be no legal trade any more, would considerably reduce poaching and smuggling.

Termination of Discussing a Future Ivory Trading System (DMM)

We advocate a final termination of the discussions about a trading system for ivory (Decision-Making Mechanism) because even discussions are keeping the trade going. The subject lapsed – also a suspension of the DMM for 4 or 5 years is counterproductive, since China as the main customer of ivory has already announced to close the local market, as well as Hong Kong. In the US, that has already happened.

Proposal to Close Domestic Ivory Markets

Furthermore each legal market offers loopholes for illegal goods. Legal goods imply for customers that ivory trade is allowed. Laymen can hardly distinguish antique ivory from new ivory. In order to exclude this risk, we support the proposal for the closure of all local markets.

This application also sends an important and reinforcing signal to China and Hong Kong, which are about to close their markets.

According to a WWF study Hong Kong could close their market within two years and not in five. China will submit a plan to close the market only at year's end. Both are large markets for legal and illegal ivory. The faster they are closed, the more elephants can stay alive. Furthermore, the markets in Thailand, Vietnam, and Angola are in the spotlight.

The voting at the CITES conference should focus on global thinking and not on supporting single markets.

The increase in confiscations within the EU shows that the EU has to improve controls and stop the legal trade. The EU Action Plan envisages the closing of domestic markets. France has already announced to do so.

It would therefore be desirable to have a ban on trade in pre-convention ivory, antique pieces, and mammoth ivory, too because this trade also provides loopholes for the black market and suggests the legality of the ivory trade to the customer.

In Europe a rapidly decreasing demand for antique ivory is seen, so it should not be a problem to close these markets permanently.



Ivory Stocks

Ivory stocks involve a number of risks: lack of transparency, dwindling by resale on the black market, and speculation. In London in 2014 Germany also had agreed to destroy its ivory stockpile. This has not yet happened. Italy has destroyed about half a ton of ivory this year already and announced to destroy the same amount once again until the end of the year. Belgium has already destroyed 1.5 tons in 2014.

To put an end to further speculation on commodity that might flow into the market and thus to pull the rug from under the price development, we unequivocally support the proposal for the ivory stockpile management.

As confiscated ivory must not be sold under CITES regulations, the cost and effort of storage are completely pointless. Moreover, it raises the suspicion that there is speculation on a sale, when the species is extinct.

It cannot be the target of a country to fuel speculation with body parts of highly endangered species. Instead, the extinction of elephants must be avoided by all means.

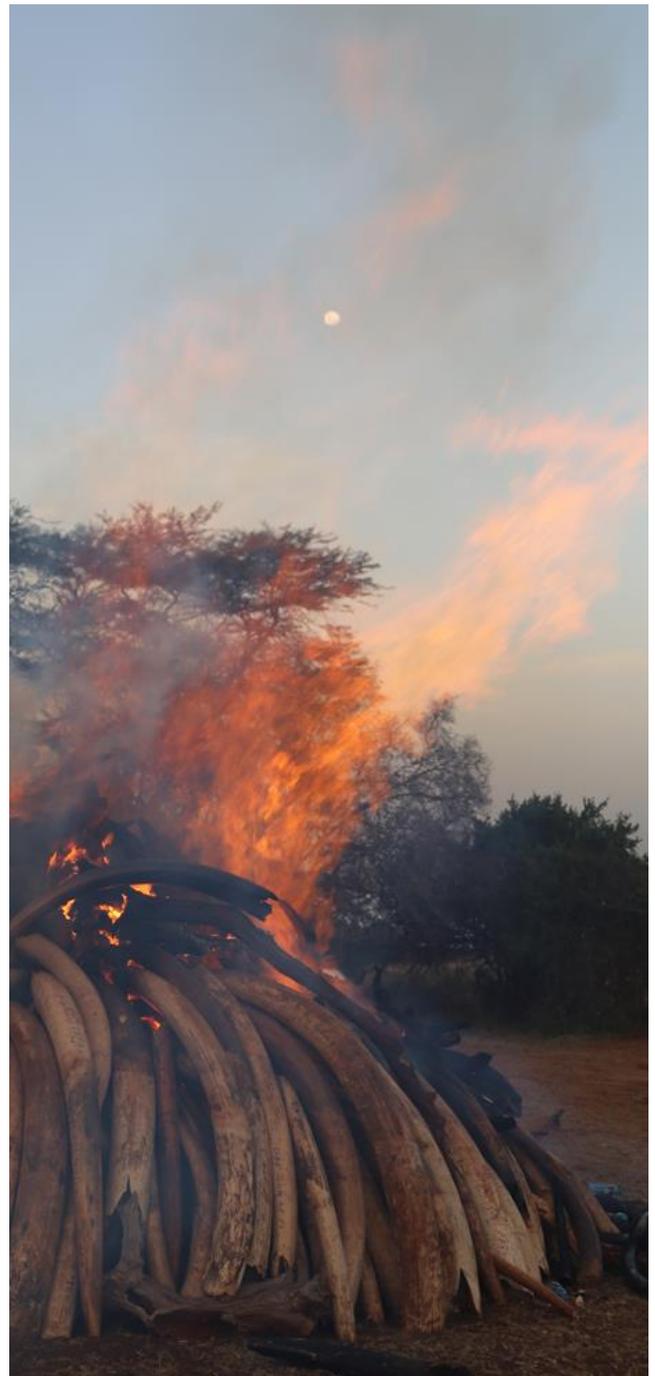
Trade with Live Elephants

We consider the export of wild elephants to zoos as very problematic. According to CITES, between 2005 and 2014, 70 wild elephants were even sold to circuses and other commercial establishments. We support stricter rules according to the proposal for the trade in live elephants.

CITES has defined rules for appropriate wild-takings and customer locations. Tearing calves from their herds and transporting them to amusement parks in China (as happened in 2015), does not correspond to these rules. Remaining traumatized herds of elephants are often so-called "problem elephants", which in turn are shot in many cases.

Concluding Remarks

Not supporting the final termination of the DMM, the Appendix I listing and the closure of domestic markets, would indicate that the decision makers do speculate on future trade and are clearly pro-trade minded – quite contrary to the trend that is just coming from countries which so far had the highest ivory consumption (China, Hong Kong, and USA) and which are just about to close their markets.



The association *Rettet die Elefanten Afrikas e.V.* advocates a complete ban in all ivory trade, i.e. there should never be any exceptional sales of ivory again, and domestic markets should be closed. Also pre-convention ivory and hunting trophies should no longer be allowed to trade. All ivory stocks should be destroyed completely. Only so elephants have a long-term chance of survival.

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Rettet die Elefanten Afrikas e.V. (REA)
 Bodenschwingstraße 30, 50170 Kerpen, Germany
www.reaev.de

Phone+ 0700/52626354
 Fax: 0700/JAMBOELI
info@reaev.de



The association "Rettet die Elefanten Afrikas e.V." has been working for the conservation of African elephant populations since more than 25 years.