

**Itai Hilary Tendaupenyu**

**PRINCIPAL ECOLOGIST REPRESENTING THE DIRECTOR GENERAL OF  
THE ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY**

**Testimony on the U.S. Fish and Wildlife Service's Plan to Implement a  
Virtual Ban on the Commercial Trade in Elephant Ivory and the  
Consequences of that Policy**

**Tuesday June24, 2014 2:00P.M.**

Mr. Chairman and members of the committee, I appreciate the opportunity to appear before you today to share my views on behalf of the Zimbabwe Parks and Wildlife Management Authority regarding the recent importation ban imposed by the U.S. Fish and Wildlife Service (USFWS) on sport-hunted elephants from Zimbabwe.

My name is Itai Hilary Tendaupenyu. I am a Principal Ecologist representing The Director General of the Zimbabwe Parks and Wildlife Management Authority ("ZimParks"). ZimParks' mission is to conserve Zimbabwe's wildlife heritage through effective, efficient and sustainable utilization of natural resources for the benefit of present and future generations and stakeholders. We strive to be the world leader in sustainable conservation.

ZimParks, much like the USFWS, has a mandate to manage the entire wildlife population of Zimbabwe, whether on private or communal lands. Although private landowners may utilize the wildlife on their land, they are still accountable to ZimParks for the welfare of the animals. Mandated with the protection, management and administration of the wildlife of Zimbabwe, ZimParks has a proud history of sound management that endeavours to conserve the unique flora and fauna heritage of Zimbabwe.

Zimbabwe welcomes President Obama's directive that United States Government executive departments and agencies assist foreign nations in building capacity to combat poaching of protected species and the illegal trade in wildlife. Although we agree with the goals of the directive, we do not agree with some of the strategies the USFWS has used to implement the directive. Instead of working with our wildlife management authorities, your FWS has made unilateral decisions and has issued edicts. The National Strategy on Wildlife Trafficking and the Advisory Council should guide international partnerships with nongovernmental organizations, local communities, and the private sector to promote mechanisms that prevent poaching and illegal trade, rather than make decisions without including these important partners. Instead of collaborating with and assisting those who are directly involved with the day-to-day effort to combat illegal wildlife trafficking, the decisions recently made by the United States have undermined Zimbabwe's conservation efforts and the success of programs like CAMPFIRE, its revenue stream, and its anti-poaching work.

Sport-hunting and the revenue it generates for Zimbabwe and its people play a significant role in the conservation of Zimbabwe's wildlife. Revenue from sport hunting is paid directly to ZimParks and the Forestry Commission (depending on where the hunting takes place). Revenue is generated from auction bids for the right to hunt on some lands, hunting lease fees (concession fees), trophy fees, and daily rates paid by hunters. Those sources of revenue contribute wholly to the conservation budget of ZimParks and the Forestry Commission. They also contribute to revenue generated on communal lands (see CAMPFIRE discussion

below). A significant portion of the revenue from sport-hunting comes from U.S. hunters. Zimbabwe's elephant conservation efforts and its anti-poaching strategies derive tremendous benefit from these sources.

Hunting often occurs in areas that are too dry for agriculture pursuits and non-hunting tourism. Without hunting, such areas would be prone to poaching due to the absence of human activity. Hunting brings accessibility to such remote areas in terms of roads, airstrips, and water development, thus making the areas economically, environmentally, and socially beneficial.

## **1.0 Background**

On 04 April, 2014, the United States Fish and Wildlife Service (USFWS) issued a press statement whilst simultaneously informing Zimbabwe of the temporary suspension of all imports of African elephant trophies taken in Zimbabwe during the 2014 hunting season. The USFWS did not send Zimbabwe a request for information about these issues until the very day that they announced the ban. The USFWS in their communication advised that they could not make a positive finding that the importation of elephant sport-hunted trophies would enhance the survival of the species as required under their Endangered Species Act (ESA) and the African Elephant Conservation Act (AECA), both being stricter domestic measures. They also cited lack of current information on the status and management of African elephants within Zimbabwe and that the suspension could be lifted after the Service had received sufficient information.

To date, the Zimbabwe Parks and Wildlife Management Authority (ZimParks) officially responded on the 7<sup>th</sup> April 2014 to the USFWS addressing all questions that had been raised and supplying a host of pertinent additional information. Meetings have also been held in Washington DC between USFWS officials, ZimParks and representatives of communities (CAMPFIRE), Safari Operators and the private sector from Zimbabwe. The USFWS has now had these materials for six weeks and yet, has made no effort to lift the ban that they based on what they claimed to be a lack of information. Now that they have had adequate time to review the information we provided, Zimbabwe would like to see the ban immediately lifted.

In all our submissions, we have been very clear and consistent about our displeasure with the manner in which this unilateral suspension was handled without prior engagement and notification, lack of transparency and science-based evidence to support this. We believe we have not been respected in all these processes.

Whilst the USFWS alluded to the fact that legal, well-regulated sport hunting, as part of a sound management programme, can benefit the conservation of listed species by providing incentives to local communities and to conserve the species by putting much needed revenue back into conservation, the suspension acts as a contradiction to all this.

## **2.0 THE STATUS OF AFRICAN ELEPHANT POPULATION IN ZIMBABWE**

There are four major elephant geographical ranges in Zimbabwe namely North- West Matabeleland, Mid Zambezi Valley, Sebungwe and South- East Lowveld. These ranges cover different land tenure categories in Zimbabwe which include state protected areas (parks estate and indigenous forest areas) privately owned land and communal lands. Systematic aerial survey and sampling techniques are used to estimate elephant numbers throughout the four

major geographical ranges in Zimbabwe. A national aerial survey of large mammals that was lastly conducted in 2001, estimated the elephant population to be 88 123. Partial surveys that have been done over years through aerial surveys, waterhole and road counts as well as ranger based data collection and monitoring show an increasing trend in elephant populations in Zimbabwe. A national aerial survey for large mammals to determine the current population of elephants is planned for the 2014 dry season with funding from Paul G. Allen through an NGO “Elephants Without Borders” based in Botswana.

### **3.0 ELEPHANT DISTRIBUTION IN ZIMBABWE**

The distribution of elephants in terms of geographical ranges Zimbabwe is shown on Appendix 1.

#### **3.1 North West Matabeleland**

This area constitutes the range for the largest elephant sub-population in Zimbabwe occupying the Hwange -Matetsi Complex including several Forest Areas as well as Hwange and Tsholotsho communal areas. Based on national survey conducted in 2001, the elephant population for this area is now estimated to be 50 000.

#### **3.2 Mid-Zambezi Valley**

The elephant sub-population in the area occupies the Parks and Wildlife Estate between Lake Kariba and Kanyemba. Based on national survey conducted in 2001, the elephant population for this area is now estimated to be 20 000.

#### **3.3 The Sebungwe**

This area forms part of the elephant range and unlike other populations in Zimbabwe is largely closed, being isolated by Lake Kariba and surrounded by human settlements. Based on a survey conducted in 2006, the elephant population for this area was estimated to be 15 000.

#### **3.4 The South-East Lowveld**

This area forms part of the elephant range covering Gonarezhou National Park, Save Valley Conservancy, Buby Valley Conservancy and the surrounding communal lands. Based on aerial surveys done in 2013, the elephant population for this area was estimated to be 12 500.

### **4.0 IMPLICATIONS OF THE SUSPENSION FOR ZIMBABWE**

The Zimbabwe Parks and Wildlife Management Authority was stunned by the unilateral decision by the United States Fish and Wildlife Services (USFWS) to suspend imports from elephant trophies hunted in Zimbabwe for the year 2014. This decision was taken without prior written notice or engagement with the Government of Zimbabwe. The suspension of imports of hunting trophies from Zimbabwe will have huge negative social and economic impacts on the national and local economies. Approximately, 67% of the annual elephant export quota is allocated to local communities and private sectors with more than half of this going to local communities. Sport hunting takes place in Safari Areas falling under the Parks and Wildlife Management Authority, Indigenous Forest Areas managed by the Forestry Commission, the Communal Lands where the Communal Areas Management

Programme of Indigenous Resources (CAMPFIRE) occurs and the Private Game Farms and Conservancies.

The CAMPFIRE programme has created expanded wildlife range. However, its collapse through the ban will reverse this situation and create increased human and wildlife conflict since the buffer for human and wildlife conflict would have been removed and ultimately there will be increased illegal off take in the core range. This move will certainly impact on wildlife conservation, the economy, community livelihoods and the effects of this ban are explained below;

#### **4.1 Impacts of Suspension on the Parks and Wildlife Management Authority**

The principal and most important form of utilization of elephants in Zimbabwe is safari or trophy hunting. Suspension on imports from elephant trophies hunted in Zimbabwe for the year 2014 and their products has adverse impact on the economic development by destroying the safari hunting industry which is anchored on a few key species of which the elephant is included. Since inception, the Parks and Wildlife Management Authority has not been receiving any funding from the Fiscus or Central Government budget to fund day to day operational activities. The Authority currently generates its income for funding operations from sustainable conservation practices including sport hunting which contributes 30% of the total income. The Authority is expected to raise enough financial resources and mobilize other resources for wildlife conservation within and outside state protected areas. The consequences of this ban will be deteriorating infrastructure and equipment due to resource constraints and increased illegal harvesting of the natural resources due to limited funding for resource protection and reduced community benefits through the CAMPFIRE programme. The Parks and Wildlife Act Chapter 20:14 as amended legally defines six categories of Protected Areas under the jurisdiction of the Parks and Wildlife Management Authority (Appendix 2). The six categories are National Parks, Safari Areas, Recreational Parks, Botanical Reserves and Gardens and Sanctuaries which in total cover about 13% of the country (5 million hectares).

The Authority has also a statutory obligation to manage wildlife conservation outside state protected areas and this entails undertaking functions such as problem animal control, fire management, law enforcement, environmental education and awareness campaigns, as its contribution to safeguarding our natural heritage, public safety and security, food security, etc. The costs of all these activities are borne by the Authority without any financial benefits at a time when the Authority is expected to be financially viable.

The Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), a brainchild of the Authority (then Department of National Parks and Wildlife Management) is a national strategy that was established with the primary purpose of helping rural communities to sustainably manage their natural and cultural resources, derive income from the resource and determine how the income would be utilized. Out of Zimbabwe's total land area of 390,757 km<sup>2</sup>, CAMPFIRE manages about 49,700km<sup>2</sup> or 12.7% of the country. CAMPFIRE manages for purposes of both wildlife conservation and other natural resources in areas with mostly rural communities. The basic premise of CAMPFIRE is that financial incentives are critical to the conservation and sustainable use of the country's wildlife and other natural resources. Natural resources in communal lands are communally owned. CAMPFIRE was designed as the answer to the management of this communally owned resource and an intervention that would prevent a chaotic situation derived from an open

access regime. The demise of this community based natural resource management programme will therefore reverse the achievements of this programme.

#### **4.2 Impacts of Suspension on the CAMPFIRE programme**

Financial benefits from sustainable use have served to increase the confidence of communities in wildlife management, thereby improving tolerance and survival of wildlife species. Safari hunting is the key driver for Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). Safari hunting benefits from large communal areas that are close to wildlife protected areas, have low density human populations and are set aside as concession areas leased for the purpose of sport hunting activities. CAMPFIRE was operationalized through the giving of Appropriate Authority status (AA) to the Rural District Councils. In the Parks and Wildlife Act of 1975 (Amendment of 1982), the AA is bestowed on the land holder and the RDC is the land holder in communal lands. Communities are only land occupiers under the jurisdiction of the RDC. Fifty eight out of sixty districts in the country participate in CAMPFIRE.

The Guidelines for CAMPFIRE issued by Government of Zimbabwe underline the fact that CAMPFIRE is a community programme and based on this understanding stipulate that, **communities must at all-time receive the highest benefits.** The guidelines also stipulate that if RDCs fail to deliver to the communities there is the need to have the AA status reviewed and or withdrawn.

In this regard the guidelines stipulate the following:

- (i) Not less than 55% of gross revenue shall go to producer communities.
- (ii) RDCs shall receive a maximum of 26% of gross revenue for the purpose of managing the Appropriate Authority status on behalf of the communities. This entails law enforcement, monitoring and capital development for wildlife.
- (iii) The CAMPFIRE Association shall receive 4% of the gross revenue.
- (iv) RDCs also get 15% of gross revenue. This is to cover overhead costs.

In CAMPFIRE areas, a significant portion of the revenue generated from sport hunting is re-invested in wildlife conservation. It is noteworthy that revenue from elephant hunting contributes approximately 60% of total earnings by Rural District Councils annually. On average, US\$1.5 million per year in net income directly benefits local communities. This income is derived from the lease of sport hunting rights to safari operators. A lesser proportion of income is generated from tourism leases on communal land, and other natural resources management activities. Up to 90% of CAMPFIRE revenue comes from sport hunting and it is important to highlight that elephant hunting contributes more than 70% of CAMPFIRE's annual revenue. If hunting is no longer an economically viable form of land use, communities will choose pastoralism and unviable agriculture, which reduces habitat available for elephants. Taking space away from elephants means more human and elephant conflict and as a result, more retaliatory killing of elephants, poaching and collusion with poaching syndicates. Local communities will only find an incentive to protect elephants if they can derive economic value from such a resource.

The ban will negatively affect Zimbabwe's efforts to meet the United Nations Millennium Development Goals through poverty reduction and rural development. The CAMPFIRE programme heavily relies on elephant trophy hunting for sustainable wildlife conservation. Apart from funding conservation, CAMPFIRE income is used, for community projects in the

fields of education, health and other livelihood support services, in rural areas. Other benefits from elephant hunting include meat which is availed to rural communities providing the much needed protein in communal areas. The ban on elephant trophy imports into USA will result in reduced benefits flow to local communities in Zimbabwe (through the CAMPFIRE program). With the diminishing wildlife value, local communities may not support any conservation efforts and instead human-wildlife conflicts will be heightened and more wildlife land might be turned into other land use options that are deemed profitable by communities.

Human and elephant conflict has been on the increase in most of the areas adjacent to the major elephant range. Appendix 3 indicates the extent of human-elephant conflict in four hot spot districts for the period 2009 to 2011. In addition to the loss and injury to human life, communities adjacent to wildlife areas suffer the following;

- Destruction of crops which affects both the quality and quantity of harvests and impacting negatively on food security;
- Destruction of property;
- Depletion of water sources;
- Destruction of water infrastructure;
- Reduced grazing land;
- Restricted access to essential commodities such as firewood;
- Loss of opportunities to carry out other activities due to time spent guarding crops and property.

The strongest and most efficient way to combat illegal trafficking of wildlife and wildlife products in communal areas is to provide local communities with the incentive to participate in the war against poaching. Furthermore, the best way to engage communities is to increase the value of wildlife above the value of these animals to poachers and to the illegal trafficking trade. Once elephants are no longer economically important to local communities, those communities will have no incentive to keep elephants and protect them.

### **5.3 Impact on the Private Wildlife Sector**

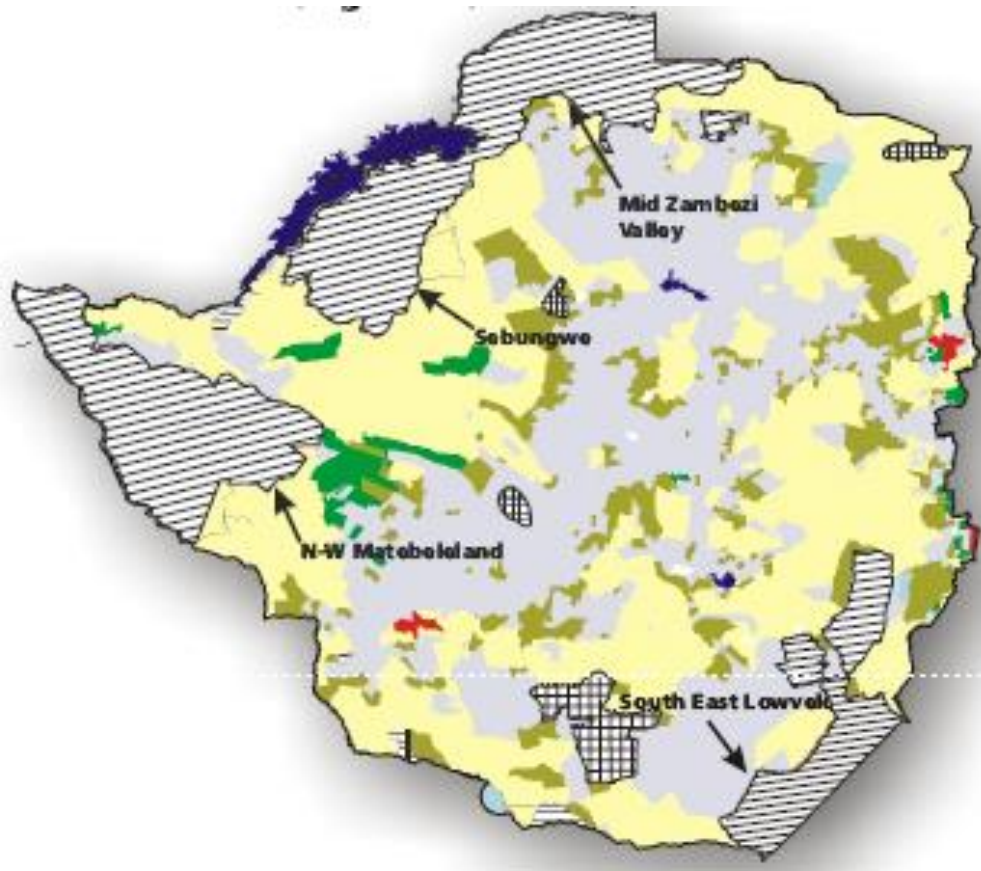
The local safari hunting industry, constituted by a healthy balance of indigenous and non-indigenous players will have huge losses in revenue as the hunts for the 2014 season had already been marketed. More than 50% of hunting clients coming to Zimbabwe every year are from the US market. Besides direct benefits from safari hunting such a cash and employment, indirect benefits arise from the multiplier effect in downstream activities such as taxidermists, dipping and packing companies, freight companies, ivory manufacturers etc. The annual CITES export quota for Zimbabwe is a maximum of 500 elephants (or 500 pairs of tusks). Between 2005 and 2009 total hunting receipts peaked \$360 125 327 over the five year period (Reserve Bank of Zimbabwe figures). This translates to an average of \$72 025 065 per year. Of the total hunting revenue in the country, elephant hunting contributes in excess of USD\$ 14 million every year. Furthermore, sport hunters are the first line of defence and the most important factor in ground intelligence, surveillance and a deterrent to poaching. It is therefore clear that the collapse of the hunting sector will have a negative impact on conservation efforts.

## **6.0 RECOMMENDATIONS**

Elephant sport hunting and hunting in general in Zimbabwe contributes significantly to the national economy and should therefore be promoted. It has been demonstrated that the elephant as one of the Big Five, is the backbone for the hunting industry in the country. Hunting is therefore crucial to the flow of revenue for conservation and all the benefits to communities in terms of employment, community projects and protein. The aggregate effect of elephant hunting to communities is the reduction of poverty and improved living standards. In light of this, we strongly appeal the USFWS to reconsider the policy of banning the commercial trade in elephant ivory taking note of the serious negative consequences of such a policy. Zimbabwe earnestly looks forward to a favourable review of the suspension of the importation of Zimbabwe's sport hunted elephant trophies taken in 2014.

*\*Supporting materials are attached as appendices 4-6.*

Appendix 1: Elephant Range in Zimbabwe





Appendix 2: Categories and numbers of protected areas in the Zimbabwe

<b>Category of Protected Area</b>	<b>Number of Protected Areas</b>
National Parks	11
Recreational Parks	16
Sanctuary	6
Safari Areas	16
Botanical Reserves	14
Botanical Gardens	3
<b>TOTAL</b>	<b>66</b>

Appendix 3: Human and Wildlife Cases for 4 Hotspot Districts from 2009 to 2011

<b>District</b>	<b>Number of cases</b>	<b>Human killed</b>	<b>Humans injured</b>
Binga	36	8	0
Mbire	6	5	1
Hwange	289	2	1
Tsholotsho	41	0	0
<b>Total</b>	<b>372</b>	<b>15</b>	<b>2</b>

# Supporting Materials

## Appendix 4: Zimbabwe Professional Hunters and Guides Association

### **Zimbabwe Professional Hunters & Guides Association**

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The Honorable Daniel Ashe  
Director, United States Fish and Wildlife Service  
Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

16<sup>th</sup> April 2014

Dear Director Ashe,

**RE: Elephant importation suspension from Zimbabwe for 2014.**

The Elephant importation suspension announced on the 4<sup>th</sup> Of April 2014 by the US FWS has been a shock to our country and the Hunting and photographic Industry, not only on the bad timing but also the lack of consultation with Local authorities.

Zimbabwe has 570 Professional Hunters registered in the country. The **Zimbabwe Professional Hunters and Guides Association** (ZPHGA), represents 120 of these registered professionals, meaning these are the acting professionals in the field at this current time that subscribe to our code of ethics and its constitution. ZPHGA will not speculate on the population of elephants in Zimbabwe as we shall leave this up to the scientists to argue. Our Employers Association, SOAZ has compiled a report on the elephant populations, statics and economic impact of the suspension.

35 Members of ZPHGA responded to our survey on the repercussions felt by this suspension. Our Members are the professionals hired by outfitters to conduct these safaris and are hired independently. A total of 1430 work days are potentially lost with revenue of US\$286,000. These 35 Individuals in turn have approximately 446 dependants that rely on this income. These are Professional Hunters, their personal employees, next of kin etc.

PH Responded	Dependents			Staff			Dependents	Days Lost	Revenue Lost
	Wife	Children	Elderly	Tracker	Skinner	Other			
35									
<b>Totals</b>	32	54	36	82	27	337	446	1,430	\$286,000

The immediate effect of the suspension could be that outfitters would simply try and sell these hunts to hunters from other countries. This would mean only the nationality of the hunters would change and the same amount of elephant will be harvested. If the reason for US FWS is for the protection of Elephants, then this reasoning is null and void.

One could argue that ZPHGA would then be compensated by different nationals however; about 60% of all hunters into Zimbabwe are US citizen and therefore the majority of market share. This loss would have an adverse effect on supply and demand and the revenue loss would still be significant.

The loss of revenue is very important for the sake of conservation. Our Professionals are the first line of defence and the most important factor in ground intelligence, surveillance and a deterrent to

poaching. It is a fact that Poaching escalates in the Non hunting months of November to March, due to the lack of presence on the ground, being our Professionals.

The risk and reward is favourable towards the protection of elephant if the reward outweighs the risk. Elephant poachers are armed and most often engage into gun fire when contact is made. This is a matter of Life and death. Our Professionals are not under any orders to engage with armed poachers, nor are they trained for this specific task. They do however engage into these life threatening situations as the reward of providing for 446 dependants outweighs the risk. If the revenue is significantly lessened by selling these hunts at a lessor price, or cancelling them, the risk will, and does outweigh the reward. This is a very significant change in Mind set and will have long ranging effects to morale. If elephant hunting is suspended or devalued, our professionals will have no incentive to help protect Elephants from Poaching.

ZPHGA has the most rigorous examinations for Professional Hunting in the world and is a 2 year apprenticeship. Our Professionals are entrusted to ensure Elephants of suitable age are harvested in the most humane manner. Our code is to ensure all hunting is done in a responsible and ethical manner.

The role of the Professional hunter and his staff in providing Intelligence and a deterrent to anti-poaching cannot be underestimated. This suspension will result in the loss of membership and their expertise and knowledge. ZPHGA believe that this Elephant suspension will dramatically increase poaching in elephant and other wildlife species.

Yours Respectfully

Mr L. Muller

Chairman

Zimbabwe Professional Hunters and Guides Association

## **Status of Elephant Populations, Hunting and Anti Poaching Effort in Safari Areas in Zimbabwe**

**Report Compiled by the Safari Operators Association of Zimbabwe (SOAZ)**

**April, 2014**

### **Introduction**

The objective of this report is to provide basic information on the current status of elephant populations, the quotas of elephant hunted from these populations, the people dependent on the safari hunting both commercial operators and their staff and communal and also the levels of anti poaching employed. It has been hastily compiled from a number of safari operators in response to the recent announcement by US Fish & Wildlife Service of a suspension of the import of trophies from elephant sport hunted in Zimbabwe during 2014.

We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange / Matetsi / Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Buby Conservancy.

While there are many more than 14 safari operators in Zimbabwe, we are confident that this covers a wide enough cross section of operations and safari concessions that the information gathered provides good, recent information on the status of elephant populations and with regards dependents and financial information, is representative of the safari industry at large. Given more time we could canvas more operators and produce a more detailed report.

### **2. Elephant Populations and levels of Poaching**

#### **2.1 South and South east Lowveld**

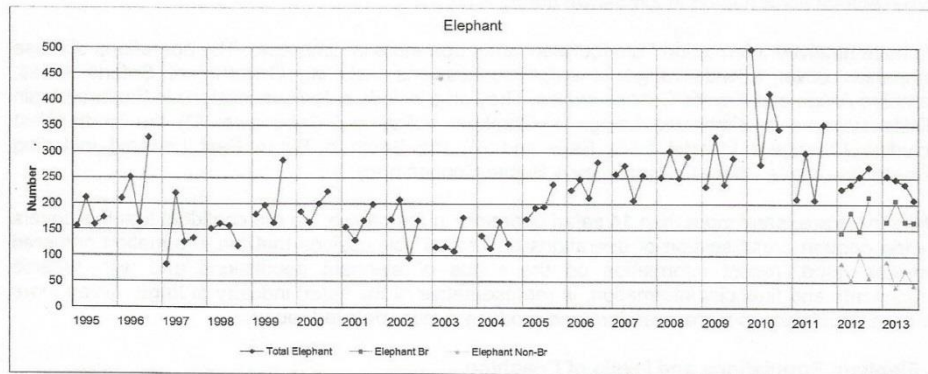
An aerial survey of **Gonarezhou National Park** last year put the elephant population at over 10,000 (Kevin Dunham per com.). This is the highest number recorded yet for the park which has a carrying capacity estimated at about 3,000. In 2007 the population was estimated at 5,000 elephants (African Elephant Database 2007). Frankfurt Zoological Society entered into a management partnership with Zimbabwe's Parks and Wildlife Management Authority (PWMA) in 2008 and have provided funding for management functions such as anti poaching. As a result, the instances of elephant poaching within the Park have been negligible and by all accounts, the elephant population continues to increase. There are a number of safari concessions bordering or close to the Gonarezhou Park including Mahenye, Chitsa, Naivasha, Malipati, Sengwe and Gonakudzingwa. These concessions have few resident elephant and are dependent on the elephant moving between the areas and the National Park. In total, an average of 40 elephant bulls are shot from these concessions each year.

In the **Save Valley Conservancy** there is an estimated population 1538 elephant based on a total aerial count conducted in September 2013. This has increased from an estimated 990 in 2006. Save Valley Conservancy conducts an annual aerial count and has done so since 2002 (reports are available). It also has an Elephant Management Plan which was developed in 2004 with financial assistance from the US Fish & Wildlife Service. There are no cases of elephant being poached within the Save Valley Conservancy. There are cases of elephant that have picked up snares and due to the nature of the wounds, having to be put down.

In **Bubye Conservancy** they have an estimated 540 elephant. This is a growing population and they have no recorded cases of elephant poaching. Bubye provided 39 elephant in 2013 to the newly formed Nuanetsi Conservancy in southern Zimbabwe as a nucleus population for this new wildlife area. This is evidence for the range of elephants in Southern Zimbabwe increasing.

## 2.2 Zambezi Valley and Sebungwe

The Zambezi Valley downstream of Kariba may be holding more than 20,000 elephants (Dunham obtained an estimate of 20,000 in 2003). This figure is far more than is believed to be sustainable (Martin, R. per com.). Reports of illegal hunting in the Zambezi Valley suggest that elephant poaching is manageable and that it isn't having a significant impact on the population. The Wildlife and Environment Society of Zimbabwe have done an annual game count in **Mana Pools National Park** in the middle of the lower Zambezi Valley since 1995. While conducted by wildlife enthusiasts and not as part of a scientific programme, the count uses the same transects and methodology each year and can give an indication of population trend. The results (Figure 1) would indicate a



general increase in the elephant population over the last 20 years.

**Figure 1. Number of elephant recorded during the WEZ Annual Game Count in Mana Pools National Park.**

In the **Rifa, Makuti, Nyakasanga** and **Mana Pools** areas of the Zambezi Valley, there were 24 elephant carcasses located as a result of elephant poaching in 2013. A further 29 were recorded in **Chewore North and South** (Louis Muller - ProSafaris, Pers Com.).

In the **Dande Safari Area** and communal Land, Buzz Charlton reported 1 elephant carcasses as a result of poaching in 2013. In 2009 they found numerous carcasses. During the period 2009 - 13, they have invested in an anti poaching unit and it would appear to have had a significant impact on reducing the incidents of elephant poaching. Since 2009 when Charlton & McCullam Safaris started operating in Dande they believe that the elephant population has not increased but has remained fairly stable.

The Sebungwe region (the area south of Lake Kariba and predominantly rural communities) has probably suffered a decline in elephant numbers. Dunham (2006) estimated 15,000 elephants in this area but the survey revealed a high proportion of carcasses in the sample count. With the human population explosion, there could be as few as 5,000 now (Martin, R per com). Operator Estimates put the population of elephant in **Sengwe** at 600 (Gary Duckworth - Mokore Safaris), **Charisa** at 1000 - 1200 (Philip Smythe - Ivory Trail Safaris) and **Omay** at 250 (Martin Pieters - Bulembi Safaris). These operators have reported a large number of poached elephant carcasses in

their areas and it would appear that the elephant in this area are suffering from increased poaching pressure.

### 2.3 North Western Zimbabwe

Extrapolation of the numbers from the last aerial survey of elephant in Hwange, conducted 2008, would put the elephant population at some 50,000 (Martin R, pers com). In the remainder of Matabeleland North (the area between Hwange and the Victoria Falls there may another 5,000-10,000 elephants. There is immigration taking place from the large, unmanaged Botswana elephant population.

There have been a number of cases recently which have highlighted the poaching of elephant in this region. At the end of 2013 there were 106 elephant carcasses found that had been poisoned by cyanide in specific water holes. The people responsible for this were caught and received significant prison sentences. There have been no further cases of poisoning reported. In the last month, two gangs of poachers from Zambia have been apprehended, one gang carrying 37 tusks. The authorities reacted to information in both these incidents and the poachers were apprehended. However, the elephant population would appear to be increasing in Hwange National Park and there are no indications it is declining.

Barry Style from Buffalo Range Safaris reports that in Matetsi Unit 6 and the Forestry / Ngamo Safaris Areas they have found about 10 elephant carcasses in the last 5 years. He mentions that there was quite a bit of elephant poaching activity three years ago but officers from Zimbabwe PWMA killed and arrested members of two gangs of Zambian poachers and since then it has been largely quiet. They do not believe that the elephant population in Matetsi area has declined.

### 3. Financial Cost of the Suspension

The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of \$3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants.

**Table 1. Results to show the number of dependents, elephant on quota and the loss of revenue and hunting days as a result of the US Fish & Wildlife Services suspension on import of elephant trophies for 14 Safari Operators in Zimbabwe**

Operator & PH's	Dependents			Number of Elephant on Quota	HuntingDays Lost due to Suspension	Value of Loss
	Staff	Anti Poaching	Community			
87	781	245	108312	110	1430	US\$3,364,450.00

It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (i.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region \$4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities.

#### 4. Anti Poaching Effort

As has been highlighted in Section 2, there is elephant poaching in Zimbabwe, both from external sources and from within the country. Without control and significant anti poaching effort, there is little doubt that the levels of poaching would increase dramatically and the elephant population in Zimbabwe would be under serious threat.

Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of \$957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching.

**Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe**

Anti Poaching expenditure - 2013	Anti Poaching Personnel Employed
US\$957,843.00	245

As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of \$1,388,872.35 towards anti poaching in Zimbabwe through their safari payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained.

#### 5. Conclusions

5.1 The most recent population surveys of elephant in Zimbabwe would estimate the national population to be over 100,000 individuals. This is the highest number of elephant Zimbabwe has had in recent times and represents a significant over population for the available range which will have a negative impact on species diversity.

5.2 The members of SOAZ do not believe that the national population of elephant is in decline or under threat as a result of poaching. On consultation with our members, most populations would appear to be increasing or stable. There does seem to be concern about the elephant population in the Sebungwe region where the impact of poaching is indicated as significant. While much of this information is anecdotal and not based on scientific survey, we are confident that in the vast majority of safari areas throughout the country, the elephant population is not significantly declining or under threat.

5.3 While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated.

We believe that the current suspension by US F&WS will result in the removal of operators from some areas (predominantly the CAMPFIRE areas) and the significant reduction of viability in other areas. This will result in the elephant and other wildlife populations in the affected areas being exposed to an increase in the levels of poaching and, therefore, population declines will result.



Zimbabwe of any action taken in recent decades. It is important to note that such a process will not be reversible.

5.4 The suspension on the import of elephant trophies into the USA from Zimbabwe has already had an impact with American hunting clients wanting to cancel or move their safaris. We would like to urge US Fish & Wildlife Service to reverse this suspension as soon as possible to prevent further damage to this industry and the positive work it is doing in protecting the wildlife resource in Zimbabwe.



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17 April 2014

The Honorable Daniel Ashe  
Director, United States Fish and Wildlife Service  
Department of the Interior  
1849 C Street, NW  
Washington, DC 20240

Dear Director Ashe,

**RE: Suspension of Import of Elephant Trophies from Tanzania and Zimbabwe**

**SUSPENSION OF IMPORT OF ELEPHANT HUNTING TROPHIES TAKEN IN TANZANIA AND ZIMBABWE IN 2014**

1. We note from your press release dated 4 April 2014 and also your "Questions & Answers" document that you advance a number of reasons and suppositions on which you base your decision to implement your suspension.
2. We submit, with respect, that your reasons and/or suppositions are neither sound nor based on fact nor do they make any conservation sense. In certain instances the reasons and suppositions seem to be contradictory.
3. You state for instance "*a lack of effective law enforcement ... resulted in uncontrolled poaching and catastrophic population declines of African elephants*". We acknowledge that such a lack, insofar as it may be present in certain areas, is problematic, but we submit that your suspension will in fact contribute to a massive, full scale breakdown in law enforcement. It is well documented that controlled hunting areas comprise the largest percentage of Africa's wildlife areas and also often form buffer zones around national parks and reserves. It is furthermore a well-documented fact that the hunting companies that operate in these areas form the first and most effective line of law enforcement defence in these areas. Your suspension will result in such a significant financial loss for these companies that many of them will be forced to either withdraw from their controlled hunting areas or to suspend or scale down their anti-poaching programmes. The ensuing vacuum will be devastating, not only for elephant populations but for all wildlife populations and the ecology as a whole. Historical evidence shows that poaching escalates at alarming, exponential rates in such a vacuum. See for instance the well-documented declines in wildlife populations in Kenya, Tanzania and the DRC during periods of sport hunting bans.

Responsible hunting for sustainable life & livelihoods



*Affiliations: Dallas Safari Club, ECGCA, Houston Safari Club, PPJA, SAGA, SATSA, Safari Club International, The Conservation Force.*

4. You state that you base your decision in respect of Zimbabwe on “*limited data*” and “*anecdotal evidence*” and then conclude that “*Zimbabwe’s elephants are also under siege.*” We are extremely concerned that you are prepared to make such a far-reaching decision based on such data and evidence. You refer to one specific incidence of poaching (of which the correctness of your figures is also disputed) without advancing any evidence that there is a systemic poaching problem in Zimbabwe. We are furthermore concerned that you may not have considered all the scientific evidence relevant to Zimbabwe. There are a number of scientific studies, by reputable scientists, that suggest that Zimbabwe’s elephant populations are in fact on the increase. Others suggest that any decline in certain local populations, if there is such a decline at all, may be the result of natural, cyclical circumstances or habitat destruction as a result of elephant overpopulation. These studies should, in our opinion, be considered when one considers the “*current situation on the ground*”.
5. It is to be noted that the poaching incident that you refer to was, to the best of our knowledge, discovered by hunting operators and that the perpetrators were caught, through the direct intervention of the hunting outfitters in the area, and duly convicted and sentenced.
6. You state that: “*Additional killing of elephants in these countries, even if legal, is not sustainable and is not currently supporting conservation efforts that contribute towards the recovery of the species.*” And then go on to state that “*Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation.* (Our emphasis.) We fully agree with your last-mentioned statement but fail to understand on what basis you proclaim the opposite in your first-mentioned statement.
7. You advance no evidence to suggest that legal elephant hunting in Tanzania and Zimbabwe is “*not sustainable*”.
8. In your “*Questions & Answers*” document you state that “*Tanzania’s and Zimbabwe’s elephants face an uncertain future.*” We submit, again with respect, that your decision will only lead to much higher levels of uncertainty, nothing else. It goes without saying that your decision will cause a major collapse in the long-term viability of the hunting industries of the countries in question, something that is of paramount importance in order to secure a certain future for Africa’s elephants and wildlife. It is well documented that without a healthy hunting industry the following will happen:
  - 8.1 Anti-poaching patrols and law enforcement by hunting companies will be scaled down or terminated in millions of acres of wildlife areas due to lack of funding (generated through lawful hunting) or due to hunting operations withdrawing from areas.
  - 8.2 Government Game Departments will lose funding (loss in license and concession fees) which will have a direct effect on their ability to implement anti-poaching and law enforcement measures.