



Statement from the African Wildlife Foundation CITES Cop17

The African Wildlife Foundation (AWF) believes Africa's unique wildlife need to be viewed and managed in total – as a larger continental herd for Africa's elephants and as one continental pride for Africa's lions.

We urge a Pan-African approach that is based in science and focuses on the needs of the species as a whole. Africa must come together on these issues with urgency and in unified spirit. The continent, indeed the planet, cannot wait for debate or allow disagreement to forestall efforts that prevent Africa's natural heritage from disappearing.

CITES is an important mechanism that governs international trade in over 35,000 species. It can and should be adjusted to account for pragmatic realities. Highly endangered species like elephants, lions and rhinos are under too much threat to be traded sustainably.

We urge national governments and members of CITES to utilize science within their proposals which focuses on protecting these species in their entirety throughout the continent.

Countries continue to play one against the other for narrow national interests. It is time for range states to look at the species that live within their borders as parts of larger metapopulations. AWF supports and stands with the governments and leaders who have the courage to put Africa's wildlife before borders.

About the African Wildlife Foundation

The African Wildlife Foundation (AWF) is the primary advocate for the protection of wildlife and wild lands as an essential part of a modern and prosperous Africa. Founded in 1961 to focus on Africa's unique conservation needs, we articulate a uniquely African vision, bridge science and public policy and demonstrate the benefits of conservation to ensure the survival of the continent's wildlife and wild lands.

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AWF Response to Proposals by CITES Represented Countries

The following outlines AWF's positioning with the following seven proposals for consideration at CITES CoP17.

Proposal 4: African Lion. Chad, Côte d'Ivoire, Gabon, Guinea, Mali, Mauritania, Niger, Nigeria and Togo have proposed (CoP17 Prop. 4) to have all African populations of *Panthera leo* (African Lion) transferred from Appendix II to Appendix I in accordance with Resolution Conf. 9.24 (Rev CoP16).

AWF recommendation is to accept.

Rationale for Acceptance

Overall, lion (*Panthera leo*) numbers have been declining rapidly across Africa. The decline is marked in the wild even though estimates of rates of decline vary. Many national populations across much of the species range are small and declining in size. Illegal trade is reportedly increasing and may have a detrimental impact on the status of the species (per Resolution Conf. 9.24 (Rev. CoP16) Annex 5). The current areas of occupancy represent a very small portion of the species presumed historic range. Lions have gone extinct in at least five range States remaining in at least twenty-five. The key threats to continued survival of the lion are retaliatory killing by farmers over livestock depredation, habitat loss, declining prey base, and inappropriate trophy hunting¹. In this regard, AWF urges the Parties to undertake concerted efforts to address these threats in addition to listing *Panthera leo* in Appendix I. The regional population in India, subspecies *Panthera leo persica* is already included in Appendix I.

Proposal 6: Cape Mountain Zebra. South Africa proposes (CoP17 Prop. 6) the transfer of the Cape mountain zebra, *Equus zebra zebra*, from Appendix I to Appendix II in accordance with a precautionary measure specified in Annex 4 of Resolution Conf. 9.24 (Rev. CoP16). After the transfer of the Cape Mountain Zebra from Appendix I to II, South Africa proposes to implement active adaptive harvest management and evaluation to set a hunting quota for the species.

AWF recommendation is to accept.

Rationale for Acceptance

¹ Bauer, H., Chapron, G., Nowell, K., Henschel, P., Funston, P., Macdonald, D., and Packer, C. 2015. Lion (*Panthera leo*) populations are declining rapidly across Africa, except in intensively managed areas. Proceedings of the National Academy of Sciences 112: 14894 – 14899.



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Endemic to South Africa, *Equus zebra zebra* was listed in CITES Appendix I in 1975. According to the proponent, overall the population has increased in numbers and distribution (at least 4,791 individuals in at least 75 subpopulations as of August, 2015) due to conservation measures. *Equus zebra zebra* does not appear to meet the biological criteria for its inclusion in Appendix I. It does not have a restricted distribution and, although its population is still relatively small, it is increasing and not regarded as under threat. The Cape Mountain Zebra can be transferred to Appendix II in accordance with the precautionary measures in Annex 4 of Resolution Conf. 9.24 (Rev. CoP16). An Appendix II listing will be consistent with recommendations set out in Res. Conf. 9.24. (Rev. CoP16) Annex 3 which stipulates that split-listing of a species should be avoided; otherwise it should be based on national and regional populations not subspecies. While supporting this proposal, AWF emphasizes the need for more clarity on management measures including a robust conservation and management plan for the species.

Proposal 7: Southern White Rhinoceros. Swaziland has proposed (CoP17 Prop. 7) to alter the existing annotation on the Appendix II listing of Swaziland's white rhino, adopted at the 13th Conference of Parties in 2004, so as to permit a limited and regulated trade in white rhino horn which has been collected in the past from natural deaths, or recovered from poached Swazi rhino, as well as horn to be harvested in a non-lethal way from a limited number of white rhino in the future in Swaziland.

AWF recommendation is to reject.

Rationale for Rejection

Across Africa rhinoceros face a poaching crisis depleting their numbers at unsustainable levels – at least 1,338 rhinos were killed Africa-wide in 2015. Given the decline in the continental population, the high value and demand for horn, AWF does not believe there is currently realistic scope for achieving a sustainable balance between production and supply. Based on the experience with the ivory trade over the last 25 years, legalized trade has proven ineffective in stemming elephant poaching in Africa². Current illegal trade in rhino horn, similar to the illegal ivory trade, is perpetuated by illegal syndicates that would continue to poach rhinos and trade in horn on the black market in defiance of a legal system. Swaziland's proposal does not provide details as to how the proposed trade will be carried out and regulated neither is the oversight role of CITES Secretariat clear. A legal trade would further complicate the efforts of law enforcement in Africa and Asia by creating a veneer of legality behind which illegal activities would persist, and sow confusion among the law enforcement community around what constitutes legal versus illegal horn. Legalizing rhino horn trade would be sending mixed messages to the marketplace at a time when a single, unambiguous message needs to be communicated to the millions—perhaps billions—of existing and potential

² Hsiang, S. and N. Sekar 2016. Does legalization reduce black market activity? Evidence from a global ivory experiment and elephant poaching data. NBER Working Paper No. 22314



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consumers of this product. Finally, pushing a proposal to trade in rhino horn is a distraction, a waste of political capital, and divisive at a time when stakeholder unity is needed to tackle this crisis. AWF acknowledges the great work being done by Swaziland but given the extraordinary threats facing these highly threatened species, we urge Swaziland to make a necessary sacrifice to abandon opening trade at this time to ensure the long-term conservation of rhinos across all range states.

Proposal 12: Pangolin Species. Angola, Botswana, Chad, Côte d'Ivoire, Gabon, Guinea, Kenya, Liberia, Nigeria, Senegal, South Africa, Togo and United States of America have proposed (CoP17 Prop. 12) to transfer all four African pangolin species - *Manis tetradactyla*, *M. tricuspis*, *M. gigantea* and *M. temminckii* from CITES Appendix II to Appendix I in accordance with Article II, paragraph 1, of the Convention. "Specifically, all four species meet the biological criteria found in paragraphs C i) and ii) of Resolution Conf. 9.24 (Rev. CoP16), Annex 1, due to a marked decline in population sizes in the wild observed as ongoing or inferred or projected on the basis of levels or patterns of exploitation, and a high vulnerability to intrinsic (i.e. low reproductive output, low density, specialized niche requirements) and extrinsic (i.e. a decrease in the area and quality of habitat) factors, and a reduction in recruitment due to indiscriminate offtake".

AWF recommendation is to accept.

Rationale for Acceptance

Pangolins are under increased levels of large-scale poaching in Africa and Asia³. Demand for pangolins is evident from increased seizures and escalation in market prices. Already hunting of pangolins in many African range countries is believed to have reached unsustainable levels. Available population data / information (CoP17 Prop. 12) justifies listing of all four African pangolin species in Appendix I.

³ First Pangolin Range State Meeting Report. <https://www.fws.gov/international/pdf/first-pangolin-range-states-meeting-report-8-3-2015.pdf>



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Proposal 14: Elephants. Namibia is proposing (CoP17 Prop. 14) to delete the annotation to the listing of the Namibian African elephant population in Appendix II by deleting any reference to Namibia in that annotation. Namibia's elephant population is CITES Appendix II listed with an annotation that "no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). Such further proposals shall be dealt with nine years after the one-off sale in late 2008 (Decisions 14.77 and 14.78 (Rev. CoP15)". Namibia seeks the removal of this annotation in its entirety in respect of its elephant population; thus deleting any reference to "Namibia" in the annotation.

AWF recommendation is to reject.

Rationale for Rejection

AWF recognizes that Namibia has managed its elephant population relatively well. However, AWF is against any further re-opening of the international trade in ivory and other elephant products at this time when elephants are facing an unprecedented poaching and trafficking crisis^{4,5,6}. Reopening such trade in ivory to feed current unsustainable consumption will further endanger elephant populations across Africa^{7,8}. AWF urges all African elephant range States, Namibia included, and the international community to take a firm position with regard to protecting Africa's elephants and to put in place stringent measures that will extinguish the insatiable demand threatening the survival of the world's largest land mammal. AWF strongly recommends that (1) all ivory stockpiles be destroyed, and (2) a domestic moratorium on ivory trade be established within each country without delay. These actions eliminate the possibility of an ivory marketplace, remove the economic incentives that are driving poaching, and prevent illegal ivory from being trafficked under the cover of a legalized trade. These strong steps send a clear message that trafficking of ivory will not be tolerated and will allow Africa's elephant populations to stabilize and recover. AWF urges the Parties at CITES COP17 to act in urgent, united resolve irrespective of the delays and possible failures of some of the earlier proposed mechanisms including the decision-making mechanism (DMM, Decision 14.77) for a process of trade in ivory under the Conference of Parties. Given the current crisis, AWF urges Namibia to make a

⁴ African Wildlife Foundation. 2013. AWF Position Statement: Elephant Ivory Stockpiles and the Ivory Trade. www.awf.org

⁵ 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.

⁶ UNEP, CITES, IUCN, TRAFFIC. 2013. Elephants in the Dust – The African Elephant Crisis. A Rapid Assessment. United Nations Environment Programme. GRID-Arendal. www.grinda.no

⁷ Wittemyer, G., Northrup, J. M., Blanc, J., Douglas-Hamilton, I., Omondi, P. and K. P. Burham. 2014. Illegal killing for ivory drives global decline on African elephants. www.pnas.org/cgi/doi/10.1073/pnas.1403984111

⁸ Hsiang, S., and N. Sekar. 2016. Does legalization reduce black market activity? Evidence from a global ivory experiment and elephant poaching data. NBER Working Paper No.22314



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necessary sacrifice and assist in shutting down the market to ensure African elephant conservation across all range States. Respectfully, AWF urges the international community to assist Namibia to find alternative means of supporting elephant conservation and rural development.

Proposal 15: Elephants. Namibia and Zimbabwe are proposing (CoP17 Prop. 15) to amend the present Appendix II listing of the population of Zimbabwe of *Loxodonta africana* by removing the annotation in order to achieve an unqualified Appendix II listing.

The proposal states that “Effective and sustainable conservation of Zimbabwe’s elephants is wholly dependent on establishing regular open market sales of elephant ivory to fund management and enforcement actions”. Zimbabwe is fully aware that the annotation affecting the Appendix II listing of *Loxodonta africana* contains the clause – “no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii).” however, Zimbabwe does not believe that an annotation can be used to contradict the right enshrined in Article XV Para 1(a) of the Treaty stating that “Any Party may propose an amendment to Appendix I or II for consideration at the next meeting [of the Conference of the Parties].”

AWF recommendation is to reject.

Rationale for Rejection

Zimbabwe’s elephant population is listed on CITES Appendix II since 1997 and it is currently covered by annotation 6. AWF recognizes that Zimbabwe still has a relatively large elephant population but the current status is not entirely clear with reports indicating overall decline from 2001 to 2014⁹. AWF is against any re-opening of the international trade in ivory and other elephant products at this time when elephants are facing an unprecedented poaching and trafficking crisis^{10,11,12}. Reopening such trade in ivory to feed current unsustainable consumption will further endanger elephant populations across Africa^{13,14}. AWF urges all African

⁹ ZPWMA. 2014. Preliminary report on aerial survey of elephants and other large mammals covering the Zambezi Valley, Sebungwe Region, North West Matabeleland and Gonarezhou National Park. Zimbabwe Parks and Wildlife Management Authority, Harare.

¹⁰ African Wildlife Foundation. 2013. AWF Position Statement: Elephant Ivory Stockpiles and the Ivory Trade. www.awf.org

¹¹ 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.

¹² UNEP, CITES, IUCN, TRAFFIC. 2013. Elephants in the Dust – The African Elephant Crisis. A Rapid Assessment. United Nations Environment Programme. GRID-Arendal. www.grinda.no

¹³ Wittemyer, G., Northrup, J. M., Blanc, J., Douglas-Hamilton, I., Omondi, P. and K. P. Burham. 2014. Illegal killing for ivory drives global decline on African elephants. www.pnas.org/cgi/doi/10.1073/pnas.1403984111

¹⁴ Hsiang, S., and N. Sekar. 2016. Does legalization reduce black market activity? Evidence from a global ivory experiment and elephant poaching data. NBER Working Paper No.22314



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elephant range States, Zimbabwe included, and the international community to take a firm position with regard to protecting Africa's elephants and to put in place stringent measures that will extinguish the insatiable demand threatening the survival of the world's largest land mammal. AWF strongly recommends that (1) all ivory stockpiles be destroyed, and (2) a domestic moratorium on ivory trade be established within each country without delay. These actions eliminate the possibility of an ivory marketplace, remove the economic incentives that are driving poaching, and prevent illegal ivory from being trafficked under the cover of a legalized trade. These strong steps send a clear message that trafficking of ivory will not be tolerated and will allow Africa's elephant populations to stabilize and recover.

AWF urges the Parties at CITES COP17 to act in urgent, united resolve irrespective of the delays and possible failures of some of the earlier proposed mechanisms including the decision-making mechanism (DMM, Decision 14.77) for a process of trade in ivory under the Conference of Parties. Given the current crisis, AWF urges Zimbabwe to make a necessary sacrifice and assist in shutting down the market to ensure African elephant conservation across all range States. Respectfully, AWF urges the international community to assist Zimbabwe to find alternative means of supporting elephant conservation and rural development.

Proposal 16: Elephants. Benin, Burkina Faso, Central African Republic, Chad, Ethiopia, Kenya, Liberia, Mali, Niger, Nigeria, Senegal, Sri Lanka and Uganda are proposing (CoP17 Prop. 16) to include 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.

AWF recommendation is to reject.

Rationale for Rejection

The elephant populations of Botswana, Namibia, South Africa and Zimbabwe are listed on Appendix II in keeping with Res. Conf. 9.24 (Rev. CoP16) Annex 3. Based on available population data the four national African elephant populations on Appendix II do not meet the criteria for inclusion on Appendix I – these populations are not small as defined in the guideline in Annex 5 of Resolution Conf. 9.24 (Rev. CoP16). Additionally, the CITES MIKE program reports the Proportion of Illegally Killed Elephants (PIKE) data for southern Africa below 0.5; thus stable / growing population (CoP17 Doc. 57.5)¹⁵. The possible exception could be Zimbabwe's elephant population which has declined recently. Botswana's large elephant population estimated at 130,000 appears stable. Estimated at 82,000 elephants, Zimbabwe's elephant population is the second largest on the continent. Namibia's elephant population estimated at 23,000 is growing (CoP17 Prop. 14). South Africa's elephant population of about 19,000 is not in decline in spite of recent poaching in Kruger National Park. Appendix II listed elephant populations are not

¹⁵ <https://cites.org/sites/default/files/.../cop/17/WorkingDocs/E-CoP17-57-05.pdf>



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restricted in range; several populations are also contiguous in the region. These elephant populations have not experienced marked declines. While AWF notes that there is nothing to prevent these and other countries proposing a transfer of Appendix I populations to Appendix II and a 'one-off sale' or ivory quota in the future¹⁶, we urge all countries to close both domestic and international trade in ivory to curb the current poaching crisis.

¹⁶ At CITES CoP15 at Doha in 2010, Tanzania and Zambia proposed to transfer pf their elephant populations to Appendix II to allow one-off ivory sales of ivory but both proposals were disallowed at the CoP.