



## Global March for Elephants and Rhinos (GMFER)

Comments on certain CoP17 provisional agenda items

August 8, 2016

Thank you for the opportunity to submit public comment on the provisional agenda for CoP17. The Global March for Elephants and Rhinos, Inc. (GMFER) submits these written comments to reinforce and supplement the verbal comments made by GMFER member Susan Campisi at the USFWS public meeting in Washington, D.C. on July 19, 2016.

GMFER represents organizers from more than 130 cities around the world and countless other voices in the global community who support our mission: ending the trade in ivory, rhino horn and lion bone to save these magnificent species from extinction. This year the global march will be held on September 24<sup>th</sup>, the opening day of CoP17, to shine a bright light on the conference and show member countries the massive global support for ending the trade and providing the strictest protections possible for elephants, rhinos and lions under international law. In addition, several GMFER representatives look forward to attending CoP17 in person.

We would like to thank U.S. Fish and Wildlife Service for your excellent work combatting wildlife trafficking through President Obama's Wildlife Task Force and Operation Crash. The agency has shown great leadership and stands as a model for the rest of the world in successfully cracking down on the illicit trade and implementing a near total ban on the legal ivory trade. We urge the U.S. to further that leadership at CoP17 by boldly speaking out in favor of the strictest protections possible for elephants, rhinos and lions and against trade in the body parts of these endangered species.

USFWS Director Dan Ashe has said that the legal trade in ivory and rhino horn serves as cover for the illegal trade. The blurred line between the legal and illegal trade is well established and enables corruption and criminal syndicates to thrive. This trade (legal and illegal) funds nefarious criminal groups, destabilizes the African continent, compromises international security, and threatens entire ecosystems. The data at this point are not in question. For how much longer will we continue to accept this wholesale destruction and destabilization? We must in all urgency push for regulations that ensure these remarkable species survive into the future, both as a proud African heritage and for the sake of all humanity and our disappearing natural world. We must end the trade.

The African Elephant Coalition (AEC), comprising 29 African countries with a shared commitment to ensuring the survival of the African elephant, submitted these five complementary proposals for CoP17 to protect elephants:

- Ban international trade in ivory by listing all elephants in CITES Appendix I (CoP17 Prop. 16)
- The closure of domestic ivory markets (Doc. 57.2)
- Improved ivory stockpile management and, where possible, destruction (Doc. 57.3)
- End debate on the Decision-Making Mechanism for legalizing trade in ivory (support Doc. 84.2 and oppose Doc. 84.3)
- Limit the trade in live African elephants to conservation projects in their natural habitat (Doc. 57.4)

GMFER urges the U.S. to support these five proposals, which taken together would end the ivory trade and afford elephants the highest protection under international law. We urge the U.S. to show leadership and be a bold voice in the international community in support of the AEC proposals. We ask that the U.S. shows solidarity with the AEC and lobbies other representatives to list all elephants on Appendix I to end the trade and support the other AEC proposals to protect elephants.

In addition to the AEC proposals to protect elephants, we ask that the U.S. take the following positions at CoP17:

- Oppose proposals from Zimbabwe and Namibia to allow sales of ivory (CoP17, Prop. 15)
- Support uplisting all African populations of lions from Appendix II to Appendix I (CoP17 Prop. 4)
- Oppose Swaziland proposal to allow trade in rhino horn (CoP17, Prop. 7)

- Support listing all rhino species on Appendix I, requiring a relisting of the white rhino species currently on Appendix II in Swaziland and South Africa (As far as we know, this proposal is not on the agenda. However, we would still like to urge USFWS to support this position, particularly when discussions of rhino horn trade arise. An Appendix I listing for all rhino species will give the rhino the greatest protection against any future moves toward a legal trade and therefore, the greatest chance of survival.)

The table below lists comments, recommendations and a summary of rationale. Some content was copied from EIA Briefings for CITES CoP17 and noted as “EIA.” Links to the EIA briefings and other sources are included.

Proposal/Document	GMFER Recommendations	Rationale
<p>CoP17 Prop. 16 – uplist all Appendix II African elephants to Appendix I</p>	<p><b>SUPPORT</b> the proposal (by Benin, Burkina Faso, Central African Republic, Chad, Ethiopia, Kenya, Liberia, Mali, the Niger, Nigeria, Senegal, Sri Lanka and Uganda) to include all populations of African elephant in Appendix I through the transfer from Appendix II to Appendix I of the populations of Botswana, Namibia, South Africa and Zimbabwe.</p>	<p>This uplisting is justified due to the marked decline in population size in the wild, 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 any one of the following: - levels or patterns of exploitation; - high vulnerability to either intrinsic or extrinsic factors</p> <p>The checkerboard approach to elephant listings is not serving to save the species. Africa needs a united front to address the poaching crisis. The confusing regulations around trade, the blurred lines between legal and illegal trade, and the rampant corruption allow the illicit trade to thrive.</p> <p>Elephants in Angola, just north of Namibia and Botswana, are under siege. “The largest herd of elephants on the Great Elephant Census was seen in Angola, nearly 550 elephants. And that’s a sign of trauma and stress, when family groups amalgamate into a mega-herd for safety. Also, these animals are now becoming nocturnal. They are so persecuted they have to live under the cover of darkness. We’re sentencing elephants to living in small, unviable, and dysfunctional populations with broken social systems.” Elephants move across international borders, so nations need to work together to save them. The recent slaughter of elephants in the Kavango-Zambezi Transfrontier Conservation Area (KAZA), straddling Zambia, Namibia, Botswana, Zimbabwe, and Angola reveals the urgency of the need.<sup>1</sup></p> <p>The KAZA are custodians of a transboundary elephant population. Considering that this is the last stronghold, that nearly 60 percent of Africa's elephants are found within KAZA, the governments should be working together to safeguard their future.<sup>2</sup></p> <p>An Appendix I listing will push countries complicit in the ivory trade to close their markets, the only thing that will ensure the long-term survival of elephants. Additionally, the increased militarization to address wildlife</p>

		trafficking is a “fail for security, people and wildlife.” <sup>3</sup> We need to unequivocally shut down the international and domestic markets for ivory and move away from the current confused model.
CoP17 Prop. 15 Namibia and Zimbabwe call to remove barriers to ivory trade	<b>OPPOSE</b> amending the present Appendix II listing of the elephant population of Zimbabwe, which would remove the annotation in order to achieve an unqualified Appendix II listing	The global community needs to be moving toward a complete ban on the ivory trade, not opening up markets that will further stimulate trade and the poaching of elephants. Elephants cannot survive an opening of the ivory market, which would fuel demand and confuse consumers in demand countries.
Doc. 57.2 Closure of domestic markets of elephant ivory  EIA	<b>SUPPORT</b> the proposal submitted by African elephant range states for the adoption of a resolution calling for the closure of domestic ivory markets  <b>CALL</b> for a decision urging China (including Hong Kong SAR) to close its domestic ivory market by the end of 2016  <b>CALL</b> for a decision urging Cambodia, Côte d’Ivoire, the Democratic Republic of the Congo, Egypt, Guinea, Japan, Laos, the Philippines, Myanmar, Nigeria, Thailand and Vietnam to expeditiously close their domestic ivory markets no later than SC69	Of the 37 African elephant range states, 30 have declared their support for the closure of domestic ivory markets. The impacts of the CITES one-off ivory sale in 2008 have been confirmed in a scientific paper which concludes that the sale had a direct impact on the supply of illegal ivory and demand for ivory resulting in a 66% increase in supply of illegal ivory. Parallel legal markets create loopholes for laundering illegal ivory and stimulate demand. <sup>4</sup>  (From EIA Briefing, <a href="https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf">https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf</a> )
Doc 57.3 - Improved ivory stockpile management and, where possible, destruction	<b>SUPPORT</b> the accurate recording and managed destruction of ivory stockpiles; the provision to Parties of the best available technical guidance, including advice on the recording and audit of stockpiles and the DNA sampling of ivory prior to destruction in order to determine its origin; and the continued engagement of other bodies able to provide expertise and resources to facilitate planned ivory disposals.	“African elephants are under intense and sustained pressure from poaching and ivory trafficking to meet global demand for ivory products. One of the consequences of this crisis is the growth in official ivory stockpiles held in range States and transit countries. The purpose of this document is to build on two earlier papers on ivory stockpiles and destructions which were submitted to the CITES Standing Committee meetings in July 2014 (SC65 Doc. 42.7) and January 2016 (SC66 Doc. 47.3) and led to constructive discussions on stockpile management.” <sup>5</sup> <a href="http://www.africanelephantcoalition.org/wp-content/uploads/2016/06/E-CoP17-57-03.pdf">http://www.africanelephantcoalition.org/wp-content/uploads/2016/06/E-CoP17-57-03.pdf</a>
Docs. 84.2 and 84.3 – Decision-making mechanism for a process of trade in ivory (DMM)  EIA	<b>SUPPORT</b> Doc. 84.2 and decide against extending the mandate under Decision 16.55 for a DMM  <b>REJECT</b> Doc. 84.3  (From EIA Briefing, <a href="https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf">https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf</a> )	Decision 14.77 to develop the DMM was originally adopted almost a decade ago, and renewed at CoP16 through Decision 16.55. There has since been an unprecedented escalation in poaching and illegal ivory trade. <sup>4</sup>  (From EIA Briefing, <a href="https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf">https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf</a> )
Doc 57.4 Trade in live African elephants	<b>SUPPORT</b> limiting the trade in live African elephants to conservation projects in their natural habitat	Doc. 57.4 spells out the rationale for this proposal. In short, capturing African elephants for export to overseas markets does not aid

		<p>conservation of the species, despite the claims of import countries, such as China and (shamefully) the U.S. In fact, these export/import deals do just the opposite. Elephant herds already face incredible stresses (all well documented and understood). The global community should seek regulations that enhance the species, not burden them with greater hardship.</p> <p>From Doc 57.4: “There are well-documented harmful effects resulting from the capture of young African elephants for ex situ purposes. These effects include the trauma experienced by these animals as they are removed from their mothers and family groups and confined in unnatural enclosures, high rates of mortality, injury and disease in captivity as well as the trauma and disruption experienced by the animals remaining in the family groups from which they are derived.”</p>
<p>CoP17 – Prop. 7 Swaziland proposal to allow trade in white rhino horn</p>	<p>REJECT the proposal submitted by Swaziland to alter the existing annotation on the Appendix II listing of Swaziland’s white rhino to allow trade in white rhino horn</p>	<p>Allowing a legal trade in rhino horn would further stimulate demand, undermine enforcement and enable laundering of illegal specimens. Years of demand-reduction campaigns in consumer countries are slowly making a dent in demand. Legalizing trade will undermine those efforts by confusing consumers. Rampant corruption throughout the trafficking supply chain makes it impossible to have a tightly regulated legal trade. Additionally, the rhino population could never sustain an open market in trade in rhino horn. Finally, all efforts to address rhino poaching have not been attempted, as those in favor of trade would like people to believe. Corruption and complacency allows poaching to continue, while leaders then use the dire statistics to justify the need for trade.<sup>6</sup></p> <p>Due to corruption and a limited supply of rhino horn, the legal trade is not governable.<sup>7</sup></p> <p>See also “EIA Briefing – Other Key Agenda Items, Recommendations for CITES CoP17” <a href="https://eia-international.org/wp-content/uploads/Part-IV_EIA-Briefing-on-Other-Agenda-Items-for-CITES-COP17_Jul-29-2016.pdf">https://eia-international.org/wp-content/uploads/Part-IV_EIA-Briefing-on-Other-Agenda-Items-for-CITES-COP17_Jul-29-2016.pdf</a></p>
<p>Doc. 68 Recommendations from the Secretariat on combatting wildlife trafficking related to the illegal trade in rhino horn</p>	<p><b>SUPPORT</b> any efforts that will strengthen international law enforcement efforts against wildlife traffickers and criminal syndicates in relation to the illegal trade in rhino horn</p>	<p>“Q. Who is benefiting from rhino poaching? A. The syndicates who are involved, the politicians who are being paid off, the corrupt officials who are also getting their share.”<sup>6,7</sup></p>
<p>List white rhinos from Appendix II to</p>	<p><b>SUPPORT</b> As far as we know, this proposal is not on the agenda.</p>	<p>An Appendix I listing for all rhino species will give the rhino the greatest protection against</p>

Appendix I	However, we urge the U.S. to support this position (even if the only opportunity for support at CoP17 is symbolic), particularly when discussions of rhino horn trade arise out of Swaziland's proposal to allow trade.	any future moves toward a legal trade and therefore, the greatest chance of survival.
CoP17 Prop. 4 - Transfer all African populations of lions from Appendix II to Appendix I	<p><b>SUPPORT</b> transferring all African lion populations to Appendix I.</p> <p>Lion populations have faced a precipitous decline in the past 50 years.</p> <p>The species clearly meets the criteria for listing on Appendix I according to CITES Resolution Conf. 9.24 (Rev. CoP16), Criteria for amendment of Appendices I and II, Annex 1 – Biological criteria for Appendix 1</p> <p><a href="https://cites.org/eng/res/09/09-24R16.php">https://cites.org/eng/res/09/09-24R16.php</a> - Resolution Conf. 9.24 (Rev. CoP16)</p>	<p>Lions are in dire need of greater protection. Threats are numerous: unsustainable trophy hunting, international trade in lion parts, retaliatory killing and/or “pre-emptive” killing to protect livestock, loss of prey, and habitat loss/fragmentation due to conversion for livestock and/or crops.</p> <p>The African lion (<i>Panthera leo</i>) has been listed in CITES Appendix II since 1977. However, this mechanism for regulating trade has been poorly implemented for nearly four decades. Appendix II has proven insufficient to halt the precipitous decline of lion populations and the Appendix I listing is long overdue.</p> <p>The proposal to list lions on Appendix I states that while “international trade in lion specimens has increased markedly in recent years”, African lion populations have declined.</p> <p>The burgeoning trade in lion bones is growing toward epidemic proportions. According to a <u>report</u> issued this week by the conservation groups Panthera and WildAid, the exact extent of this trade is unknown, but all indications suggest that it is growing toward epidemic proportions.</p> <p>The captive breeding and farming of wild animals (tiger, bear, lion, rhino, etc), an industry that proponents claim takes pressure off wild populations, thereby aiding conservation, instead puts greater stress on wild populations, accelerating their decline.</p> <p>See Sources 8 – 12, plus “Debunking the Pro-Trade Propaganda” – section on tiger and bear farming in China.  <a href="http://annamiticus.com/2013/10/14/rhino-horn-debunking-the-pro-trade-propaganda/">http://annamiticus.com/2013/10/14/rhino-horn-debunking-the-pro-trade-propaganda/</a></p>

**IN ADDITION:**

GMFER urges the U.S. to support the following EIA recommendations to CITES Parties:

- a) Support the proposal submitted by African elephant range States for the adoption of the draft Resolution presented in the Annex to CoP17 Doc. 57.2;

- a) Note that China remains the key driver of the illicit ivory trade and further note the devastating impact of the 2008 CITES one-off sale on elephants in the wild and urge China (including Hong Kong SAR) to close its domestic ivory market by end of 2016; and
- b) Urge Cambodia, Côte d'Ivoire, the Democratic Republic of the Congo, Egypt, Guinea, Japan, Laos, the Philippines, Myanmar, Nigeria, Thailand and Vietnam to expeditiously close their domestic ivory markets no later than SC69.

Furthermore, recent reports have shown that Vietnam and Japan, in addition to China and Thailand, are major hubs for the illegal ivory market, as well as for rhino horn and lion bones. The U.S. should use its leadership to give visibility to the fact that these demand countries continue to fuel the slaughter of elephants, rhinos and lions.

Thank you for your time and consideration.

Sincerely,  
Susan Campisi  
GMFER Core Strategist

**Sources:**

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- 2) Elephants Wiped Out on Alarming Scale in Southern Africa  
<http://news.nationalgeographic.com/2016/04/160406-elephants-wiped-out-alarming-scale-Southern-Africa/>
- 3) MILITARISING CONSERVATION: A TRIPLE 'FAIL' FOR SECURITY, PEOPLE AND WILDLIFE  
<https://sustainablesecurity.org/2016/06/23/militarising-conservation-a-triple-fail-for-security-people-and-wildlife/>
- 4) EIA Briefing – Elephants, Recommendations Regarding Certain Agenda Items for CITES CoP17  
[https://eia-international.org/wp-content/uploads/Part-II\\_EIA-Briefing-on-Elephants-for-CITES-COP17\\_Jul-29-2016.pdf](https://eia-international.org/wp-content/uploads/Part-II_EIA-Briefing-on-Elephants-for-CITES-COP17_Jul-29-2016.pdf)
- 5) African Elephant Coalition CoP17 proposal to address ivory stockpiles  
<http://www.africanelephantcoalition.org/wp-content/uploads/2016/06/E-CoP17-57-03.pdf>
- 6) "Debunking the pro-trade propaganda"  
<http://annamiticus.com/2013/10/14/rhino-horn-debunking-the-pro-trade-propaganda/>
- 7) "Where are Donations to Save Rhino Going?" – transcript of a radio interview with Nigel Morgan, chairman of Focus Africa Foundation  
<http://www.nikela.org/rhino-friday-donations-sanparks/>
- 8) "Lion Population in Africa Likely to Fall by Half, Study Find" – NY Times, October 25, 2015  
[http://www.nytimes.com/2015/10/27/science/african-lion-population-is-dwindling-study-finds.html?\\_r=0](http://www.nytimes.com/2015/10/27/science/african-lion-population-is-dwindling-study-finds.html?_r=0)
- 9) "Lion populations are declining rapidly across Africa, except in intensively managed areas" – published in the Proceedings of the National Academy of Sciences of USA (PNAS), September 27, 2015  
<http://www.pnas.org/content/112/48/14894>
- 10) "How trophy hunting is pushing lions to the brink of extinction"  
<http://www.humanesociety.org/news/magazines/2016/01-02/trophy-hunting-devastation.html>
- 11) A Growing Threat to Lions: Illegal Trade in Their Bones  
<http://blogs.scientificamerican.com/extinction-countdown/lion-bones-cecil/>
- 12) Beyond Cecil: Africa's Lions in Crisis  
<http://letlionslive.org/LionReport.pdf>