

Importation of Elephant Hunting Trophies Taken in Tanzania and Zimbabwe in 2015 and Beyond

July 10, 2015

Questions and Answers

What is the U.S. Fish and Wildlife Service's (Service) decision on the import of sport-hunted elephant trophies from Zimbabwe?

The Service has found that the import of sport-hunted trophies from elephants hunted in Zimbabwe on or after January 1, 2015, will not enhance the survival of the species. A suspension on the import of elephant trophies from Zimbabwe has been in place for trophies taken on or after April 4, 2014. The March 26, 2015, announcement extends the suspension into 2015 and indefinitely into the future. The suspension on importation of trophies could be lifted if additional information on status and management of elephants in Zimbabwe were to become available that satisfies conditions under the Endangered Species Act (ESA).

On April 4, 2014, the Service announced an interim suspension of imports of sport-hunted African elephant trophies hunted in Zimbabwe during calendar year 2014. This decision was clarified on April 17, 2014, to indicate that the suspension only applied to trophies taken on or after April 4, 2014. On July 17, 2014, after evaluating new information provided by the Government of Zimbabwe and others, the Service determined it was unable to make the required enhancement finding under the ESA and confirmed that a suspension of elephant trophies hunted in Zimbabwe from April 4, 2014, to December 31, 2014, was in place. (Note: The decision was made on July 17, 2014, but due to technical revisions and updating, a revised version was signed on July 22, 2014).

What is the Service's decision on the import of sport-hunted elephant trophies from Tanzania?

Based on the current situation on the ground in Tanzania, the Service is not currently able to make the findings necessary to allow the import of sport-hunted trophies from elephants hunted in Tanzania during calendar year 2015. The Service makes decisions on the import of sport-hunted trophies from elephants hunted in Tanzania on an application-by-application basis. Unless information is received that shows a significantly improved situation for elephants in Tanzania such that the required findings could be made, permit applications for the import of elephant sport-hunted trophies would be denied.

Why has the Service made these decisions?

Sport hunting, as part of a sound wildlife management program, can provide benefits to conservation. However, given the situation in Tanzania in 2014 and 2015, and given the information available to the Service regarding elephants in Zimbabwe, the agency is not assured that the benefits of sport hunting will be realized in those countries.

Zimbabwe: When the Service announced the interim suspension on the import of elephant trophies from Zimbabwe on April 4, 2014, we based the decision on the limited information available to us at the time. Since the time of that announcement, the Government of Zimbabwe, non-government organizations, safari outfitters, professional hunter associations, and individuals provided the Service with additional information regarding the management and status of Zimbabwe's elephant population. Based on review

of all available information, the Service is unable to find that the killing of an elephant whose trophy is intended for import would enhance the survival of the species for the following reasons:

- Unclear progress toward goals and objectives of elephant management plans: Zimbabwe's elephant management plan, which consists primarily of two outdated documents (1996 and 1997), provides a well-developed list of goals and objectives but lacks information on the implementation of those plans and the progress made toward meeting the stated goals and objectives.
- Inadequate information to confirm population status: The Pan African Elephant Aerial Survey has been conducted in Zimbabwe, and preliminary findings have been announced. This is a significant, positive step forward toward Zimbabwe having adequate information to establish scientifically defensible hunting quotas, particularly in light of the limited information on other means of off-take, such as poaching and problem animal control. If this information is incorporated into management activities in a scientifically sound manner, the Service may have a better basis to re-evaluate our finding with regard to importation of elephant trophies in the future.
- Implementation and enforcement of existing laws and regulations: Although Zimbabwe has laws and corresponding regulations in place to address elephant management, there appears to be an inability to implement and enforce these laws, possibly due to lack of funding or inadequate governance.
- Questionable hunting quotas: The Service did not receive information on how hunting quotas are established and whether other forms of offtake, such as poaching and problem animal control, were taken into account.
- Use of revenue generated from sport hunting: The Service does not have current information on how funds generated from elephant sport-hunting are utilized and cannot confirm whether revenue generated through sport hunting actually provides an incentive to local communities to conserve elephants.
- Lack of government support: A number of non-governmental entities, including individual land owners or lease-holders, safari outfitters and conservancies, are doing outstanding conservation work in Zimbabwe. However, without more support from the Government of Zimbabwe and Rural District Councils, these efforts are not likely to be fully successful, and they do not overcome the problems currently facing Zimbabwe's elephant populations.

For detailed information on the Zimbabwe decision, please refer to the ESA enhancement finding at <http://www.fws.gov/international/pdf/enhancement-finding-March-2015-elephant-Zimbabwe.pdf>

Tanzania: In 2014, questionable management practices, a lack of effective law enforcement, and weak governance have resulted in uncontrolled poaching and catastrophic population declines in Tanzania. For 2015, while a number of positive steps have been taken by the government of Tanzania to improve the situation for elephants, the benefits of those actions are not being realized. Recent population estimates from a country-wide aerial survey show that Tanzania's elephant population has dropped from 136,000 in 2005 to 43,000. Although surveys indicate that the number of elephants in the Selous area may have increased slightly, in the Ruaha area numbers dropped from 20,000 to 8,272 elephants since 2013. For detailed information on the 2014 and 2015 Tanzania decisions, please refer to the CITES non-detriment finding posted at <http://www.fws.gov/international/pdf/non-detriment-finding-2015-elephant-Tanzania.pdf> and the U.S. Endangered Species Act enhancement finding posted at <http://www.fws.gov/international/pdf/enhancement-finding-2015-elephant-Tanzania.PDF>.

Does the Service plan to shut down all sport hunting of African elephants?

No. 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. At this time, the Service does not have conservation concerns with the sport hunting of African elephants in Namibia, South Africa or Botswana, although it should be noted that Botswana may currently have restrictions on elephant sport hunting.

To support conservation, hunters should choose to hunt only in countries that have strong governance, sound management practices, and healthy elephant populations.

I hunted an elephant in Tanzania or Zimbabwe *prior* to 2014 but have not yet imported the trophy. Will I be able to do so?

Yes. Our inability to make the findings required to authorize the import of sport-hunted trophies from Tanzania extends only to elephants hunted in calendar years 2014, 2015, and future years. For Zimbabwe, the decision to suspend the import of trophies applies only to elephants hunted on or after April 4, 2014. If you plan to import an African elephant sport-hunted trophy from either of these countries, you will need to provide documentation to show that the elephant was hunted prior to the effective date of these decisions (January 1, 2014, for Tanzania; April 4, 2014, for Zimbabwe).

When will the Service reevaluate whether it is able to make the findings necessary to authorize the import of sport-hunted African elephant trophies from Tanzania and Zimbabwe?

The Service makes decisions on whether to issue a permit to authorize the import of sport-hunted trophies from elephants hunted in Tanzania on an application by application basis and would reevaluate its findings if it receives changed or additional information at a later date that shows an improved situation for elephants in Tanzania such that the required findings could be made.

For Zimbabwe, the suspension will continue indefinitely unless the Service receives additional information that documents that the situation in Zimbabwe meets the criteria established under the ESA.

A CITES import permit is not required to import an elephant trophy from Zimbabwe into the United States. What authority does the Service have to restrict imports, and how would the restriction be enforced?

African elephants from Zimbabwe are included in CITES Appendix II for the purpose of non-commercial trade in hunting trophies, among other things. As with all CITES Appendix-II specimens, an import permit is not required. However, the listing of African elephants as a threatened species under the ESA contains a provision that requires the Service to make a determination that the import of an elephant trophy would enhance the survival of the species. The Service must make this enhancement finding to be able to allow the import of an African elephant trophy from any country. With the suspension of imports in place, at the time of import, the Service's Office of Law Enforcement will either refuse entry or seize any elephant trophy from Zimbabwe that was hunted on or after April 4, 2014.

Where should I send additional questions? If you have specific questions regarding the import of sport-hunted trophies, please send an email to managementauthority@fws.gov or call 800-358-2104.

For additional information on these decisions, please refer to the following web links:

- Zimbabwe
 - U.S. Endangered Species Act enhancement finding:
 - April 4, 2014, finding – <http://www.fws.gov/international/pdf/enhancement-finding-April-2014-elephant-Zimbabwe.PDF>
 - July 22, 2014, finding – <http://www.fws.gov/international/pdf/enhancement-finding-July-2014-elephant-Zimbabwe.PDF>
 - March 26, 2015, finding – <http://www.fws.gov/international/pdf/enhancement-finding-March-2015-elephant-Zimbabwe.pdf>
- Tanzania
 - CITES non-detriment finding:
 - 2014 finding – <http://www.fws.gov/international/pdf/non-detriment-finding-2014-elephant-Tanzania.pdf>
 - 2015 finding – <http://www.fws.gov/international/pdf/non-detriment-finding-2015-elephant-Tanzania.pdf>
 - U.S. Endangered Species Act enhancement finding:
 - 2014 finding – <http://www.fws.gov/international/pdf/enhancement-finding-2014-elephant-Tanzania.PDF>
 - 2015 finding – <http://www.fws.gov/international/pdf/enhancement-finding-2015-elephant-Tanzania.PDF>