



TANZANIA SAFARI OUTFITTERS ASSOCIATION

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Ref. #: MNRT/2014-014

April 10th, 2014.

Mr. Paul Sarakikya
Director of Wildlife
P. O. Box 9372
Dar es salaam

Dear Sir,

**RE: IMPORT BAN BY UNITED STATES FISH AND WILDLIFE SERVICE (USFW)
ON ELEPHANT TROPHIES LEGALLY HUNTED IN TANZANIA.**

As you are well aware, the United States Fish and Wildlife Service has recently imposed a ban on legally hunted elephant trophies into the United States of America effective in 2014.

The ban was announced on April 4th, 2014. Reasoning behind this ban are cited as follows:

"The U.S. Fish and Wildlife Service today announced a suspension on imports of sport-hunted African elephant trophies taken in Tanzania and Zimbabwe during calendar year 2014. Questionable management practices, a lack of effective law enforcement and weak governance have resulted in uncontrolled poaching and catastrophic population declines of African elephants in Tanzania. In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege.

Given the current situation on the ground in both Tanzania and Zimbabwe, the Service is unable to make positive findings required under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Endangered Species Act to allow import of elephant trophies from these countries. 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.

The decision to suspend the import of sport-hunted trophies from Tanzania and Zimbabwe applies to elephants taken in 2014. The Service will reevaluate this suspension for calendar year 2015 or upon receipt of new information that demonstrates an improved situation for elephants in these countries.

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 African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to sport hunting."

Needless to say, this is a severe blow to our legally regulated industry. The ban, imposed without notice nor consult, suggests a very negative intent. Vague justification as evident above, does not bode well with an industry with resource sovereignty, legal infrastructure and legislated framework that conforms to national and international guidelines/criteria.



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We ask for your position on this matter as partners in wildlife conservation and custodians to the wealth of natural resources in Tanzania. Our good intentions are now under attack.

As a representative association of primary stakeholders in a highly successful value-based sustainable utilization policy of selective tourist hunting, TASOA would like to express its serious concerns at the following levels:

- **Socially;** the tourist hunting industry is a big contributor to employment and wildlife conservation awareness in urban and rural populations. In some areas, it is the only platform for exposure and interaction between tourists and local populace. It is also a significant community development platform through its direct/indirect monetary and project contributions (i.e. funds/schools/clinics/wells/offices etc.).
- **Economically;** the tourist hunting industry is a major contributor to the economy at all levels of government (district/regional/national), primary/secondary private sectors (Outfitters/Agents/Professionals/Hotels/Aviation/Road and Rail Transport/Offices/ Restaurants/Shopping Centers/Arts and Crafts/Local Business & Service Providers), International Trade (foreign exchange) and Investment (infrastructure & capacity).
- **Ecologically;** the tourist hunting industry is the sole contributor to protection of wilderness habitat and wildlife populations outside of National Parks, the NCAA and designated non-consumptive tourism sections of the Selous Game Reserve. It is also a key stakeholder to the Wildlife Division in serving as natural resource managers.

The above facts, which encompass root reasons for a successful and developing policy of value-based sustainable utilization, employed and implemented by Tanzania, as a people and sovereign country, bring major concerns in relation to the ban imposed by USFW. The ban endangers and to some extent attacks good intentions of the policies and stakeholders.

On behalf of stakeholders, wildlife conservation in general and the African Elephant as key species in this context, TASOA would like to address the imposed ban and its' cited points;



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“Questionable management practices, a lack of effective law enforcement and weak governance have resulted in uncontrolled poaching and catastrophic population declines of African elephants in Tanzania.”

The above reasoning is not rooted in Tanzania (where supply originates), but internationally (where demand is high), the origins fuelling a senseless slaughter. Tanzania does not trade in ivory. Nor do Tanzanians, buy ivory or have financial resources for any significant effect on the ivory trade. The “uncontrolled poaching and catastrophic population declines of African Elephants in Tanzania” are a **result** of foreign demand for ivory which has **led** to the “questionable management practices, a lack of effective law enforcement and weak governance” domestically from high incentive provided internationally by illegal trade and lawless entities.

The legally founded and legislatively regulated tourist hunting industry is in no form or function involved in illegal ivory trade, elephant decline or consequences related to the demand for illegal ivory internationally. So why is it being subjected to trade bans? Why is a legal platform being made a scapegoat for illegal acts?

“Given the current situation on the ground in both Tanzania and Zimbabwe, the Service is unable to make positive findings required under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and the Endangered Species Act to allow import of elephant trophies from these countries.”

What current findings exactly? Is it reference to any particular protected area, geographic region or country? Maybe the absence of positive findings can be attributed to the fact no hunting outfitters or professionals have been consulted on this matter, even though they account for a protection presence in over 20% of wilderness habitat in protected and non-protected areas. It could also be attributed to the presence of African Elephant in Tanzania today, being equally abundant in hunting concessions compared to National Parks. There **are** in fact many positive findings available in Tanzania, not only for the African Elephant but wildlife and natural resource in general. If extreme examples are used to judge, then extremist decisions tend to result.

International demand, illegal trade and poached ivory are root causes in the decline of the African Elephant. A country that has and continues working hard to protect its resource as one of the largest elephant strongholds on the continent is now being compromised by USFW. Furthermore, USFW have decided to compromise an industry which is a big reason behind survival of the African Elephant. This is achieved through protecting its habitat, migratory corridors and combating poachers nationwide. This is the real situation on the ground.

“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.”

The legal killing of elephants does not account for more than 50 animals per year. This quota DOES IN FACT support the protection, maintenance and recovery of the species in Tanzania. Even the lowest recent elephant population estimates are approximately 50,000, which puts the legal quota at 0.1%. But even if the population were half the estimate (25,000), that would still put the quota at 0.2%, which is highly sustainable, especially considering legal hunts are



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selective and conform to elephant gender, age and size criteria which are further mechanisms of ensuring sustainable offtake. Our tourist hunting is legal BECAUSE of its SUSTAINABILITY!

'Additional' killings should be first and foremost classified as the **illegal killings**. It is clear that legally regulated tourist hunting of elephant in Tanzania is highly sustainable. But more importantly, why is USFW making decisions that adversely affect Tanzania and its conservation efforts based on vague and incorrect reasoning? What are their motives? How and with whom has this matter been deliberated? Did US hunters condone it?

"The decision to suspend the import of sport-hunted trophies from Tanzania and Zimbabwe applies to elephants taken in 2014. The Service will reevaluate this suspension for calendar year 2015 or upon receipt of new information that demonstrates an improved situation for elephants in these countries."

The above is a reason we suspect this decision to be of negative intent. By subjecting an industry to losses and insufficient ability to protect itself, how does the USFW expect to register an improved situation a year later? Is this a ploy to completely remove the elephant as a huntable species as done with the Rhino in Tanzania? Look what happened to the sustainability of Rhino in Tanzania after the ban. The situation **will deteriorate DUE to the BAN imposed by the USFW**. They USFW are imposing difficult circumstances on a proven conservation strategy.

"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."

The above statement is very clear in its meaning and advocacy, yet the USFW have made a decision to contradict their very policy and foundations of benefit to conservation, species and local communities. We believe USFW is acting on pressure from avenues that have no idea about the reality and practicality of conservation needs in Africa. This ban in fact endangers everything good about conservation efforts in Africa.

If their intention is to support conservation and conform to principles of sustainability of resources and the protection of the elephant, the USFW has made a big mistake. If they do not reverse their ban, it is then clear their actions are an attack on our policies. What then are their intentions?

"At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to sport hunting."

Please note reference to a country that has banned hunting all together (Botswana). Is that an indication of USFW intentions? Namibia and South Africa have developed a wildlife policy very different to Zimbabwe and Tanzania who now face bans. Interestingly, Tanzania & Zimbabwe maintain a nationwide natural wilderness policy (are facing bans), while countries with fenced, ranching and game farming policies have no conservation concerns attached to them. Are these objectives of the USFW? It would be interesting to take into account and compare elephant numbers in hunting countries with and without concerns under the USFW radar. We believe the ban is not based on facts, but a result of political and other pressures best known to the USFW



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We have Outfitters forced to cancel safaris, refund deposits and will no longer register funds as projected at the marketing shows. It is a catastrophe for their good intentions. Tanzania is a destination that allows multiple species hunted on one license. Many hunters therefore choose Tanzania for this reason. With elephant banned for export to the USA, American hunters have cancelled their safaris. Some Outfitters are largely dependent on elephant hunting for their survival. They now face a daunting task to even remain in the industry, let alone continue operating for this season. None of this is good for elephant protection.

It is unfair that Tanzania be subjected to such a ban when our history clearly illustrates a success model of wildlife conservation through selective professional hunting. The reason Tanzania has maintained such a wealth of wildlife resource is because of our sustainable utilization policies. The likes of the late Cotton Gordon, Hilary Daffi, Paulo Shanalingigwa, Gerard Pasanisi, Luke Samaras, Robin Hurt and many others who pioneered these policies in the field, are testament to their practical application, viability and success in the context of Tanzania. The present crop of professionals are further developing and adapting policies for continued success. It is undoubtedly the most efficient and effective conservation tool in practice in Tanzania. Without it, there would not be half the wildlife resource we have.

The ban on key species, can and will lead to a total collapse of the single most successful and practical conservation tool viable in Tanzania – hunting.

BEWARE! Examples of such failure are evident in Kenya, who have since lost 80% of their wildlife since a hunting ban.

At a time when foreign authorities and international organizations should be coming to the aid and support of a country under attack by the poaching scourge fuelled by international illegal ivory trade, it defeats understanding to see entities such as the USFW adding to our problems to the point of aiding the enemy and supporting the problem. It defeats purpose.

Tanzania has recently opened its doors to the international community to assist in the war against poaching. It has humbly submitted that it cannot fight the war alone against such a highly funded and determined enemy. In its time of need, Tanzania needs all the help it can get to protect its elephant population – undermining this effort is not what was expected & should not be entertained. The USFW should be better advised in its advocacy & decisions.



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As our governing authority and partner in conservation, we ask your respected office to address this damaging matter with the urgency and seriousness it deserves. We protect our natural resources, but we must also protect our right to protect it, at all costs. We are ultimately responsible of our resources and their fate. We cannot and should not, change our successful policies and ideology to unfounded, foreign and unproven options.

You have our full support in moving forward and we hope, through better judgment, the USFW will remove the ban it has imposed for the sake of the African Elephant and its future survival in Tanzania. It is our hope that efforts are placed firmly on the root cause of the problem – the international demand for ivory, which is clearly illegal. There is absolutely no connection between our legally sustainable elephant hunting policy and the illegal trade which originates beyond Tanzanian borders. Our decisions as custodians must be based on facts, knowledge, science, case studies, history and present reality. TASOA humbly submits.

Faithfully,

Ryan Shallom
Executive Secretary
Minister – MNRT

c.c. Honorable

Chairman – TAHOA
Chairman – TPHA
Chairman – SPHA