

## Maintenance of the South African population of African Elephant *Loxodonta africana* in Appendix II. Proponent: South Africa.

**Amendment of annotation °604 regarding the South African population to allow the initial sale of the Kruger National Park stockpile of ivory, 18 months after the adoption of the proposal and a subsequent annual quota of two tonnes.**

**For the exclusive purpose of allowing in the case of the population of South Africa:**

- a) trade in hunting trophies for non-commercial purposes;
- b) trade in live animals for re-introduction purposes into protected areas formally proclaimed in terms of the legislation of the importing country;
- c) trade in hides and leather goods;
- d) trade in raw ivory of whole tusks of any size, and cut pieces of ivory that are both 20 cm or more in length and one kilogram or more in weight of Government-owned stocks originating from the Kruger National Park. An initial stockpile of 30,000 kg is proposed and a subsequent annual quota of 2,000 kg accumulated each year through annual mortalities and management practices.

**All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.**

**Summary:** The South African population of African Elephant was transferred from Appendix I to Appendix II in 2000, subject to annotation °604. Parts of the annotation currently applicable to South Africa allow for: 1) trade in hunting trophies for non-commercial purposes; 2) trade in live animals for re-introduction purposes into protected areas formally proclaimed in terms of legislation of the importing country; and 3) trade in hides and leather goods. Trade in raw ivory shall be whole tusks of government-owned stock originating from the Kruger National Park, subject to a zero quota. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

The proposed amendment to annotation °604 requests a one-off export quota of 30 000 kg (30 tonnes) of government-owned raw ivory of both raw tusks of any size and cut pieces that are both over 20 cm long and more than 1 kg in weight originating from Kruger National Park, followed by an annual quota of 2 000 kg of raw ivory meeting the same specifications. The initial export is to take place 18 months after adoption of the proposal. The other parts of the annotation remain unchanged.

The proposal entails a request for an annual quota for export of raw ivory, following a one-off export quota, and may thus be interpreted as adhering to paragraph D, Annex 4, of Resolution Conf. 9.24. There are no explicit guidelines in the Convention or in resolutions of the CoP for assessing such requests. However, as noted in the introduction to the elephant proposals, because annotation °604 indicates that all specimens of African Elephant in South Africa other than those specified in the annotation should be treated as if they were of species in Appendix I, the terms of paragraph B 2c) of Annex 4 of Resolution Conf. 9.24 appear to be applicable. These state that the quota must be approved by the Conference of the Parties, based on management measures described in the supporting statement of the amendment proposal, provided that effective enforcement controls are in place. An analysis of whether the South African population of African Elephant might meet the criteria for inclusion in Appendix I is set out in the analysis of proposal 12.11.

**Analysis:** The supporting statement reports that the raw ivory intended to be exported is that recovered from natural mortalities, natural breakages and management activities in Kruger National Park. The current accumulation of such ivory is noted in the supporting statement as just over 31.5 tonnes, but the basis for calculating the annual expected accumulation of raw ivory to be exported under annual quota is not clear. No importing countries for raw ivory are specified in the proposed annotation, nor are any conditions set out that importing countries might be expected to meet, although these are referred to in general terms in the supporting statement.

Supporting Statement (SS)	Additional information
South Africa	<u>Range</u>

Supporting Statement (SS)	Additional information
<b><u>IUCN Global Category</u></b>	
	<i>Loxodonta africana is classified as EN A1b</i>
<b><u>Management measures</u></b>	
<p>SS states that in South Africa it is feasible to maintain elephants only within the confines of fenced protected areas. Details of management practices within these areas are provided in the SS.</p>	
<p>SS gives stockpile of raw ivory accumulated in Kruger National Park as just over 32 tonnes. Just over 0.5 tonnes are identified as of unknown origin or seized or confiscated and are not considered eligible for trade, so that the existing stockpile eligible for trade is just over 31.5 tones. SS states that the subsequent annual quota of 2000 kg (2 tonnes) will be accumulated through annual mortalities and management practices.</p>	<i>The basis for calculating the annual expected accumulation of raw ivory is not given in the SS.</i>
<b><u>Enforcement measures</u></b>	
<b>within proposed country of export</b>	
<p>Raw ivory: details of control measures are set out in the SS.</p>	<i>Hides and leather goods: There is no evidence of significant elephant poaching associated with commercial trade in elephant hides (TRAFFIC East/Southern Africa, 2002).</i>
<b><u>Enforcement measures</u></b>	
<b>within potential countries of import</b>	
<p>Raw ivory: SS indicates that only countries that meet conditions on national legislation and domestic trade controls as set by the CITES Secretariat will be eligible to buy ivory from South Africa.</p>	<i>Raw ivory: No importing countries are specified, nor do any conditions for importing countries form part of the proposed amendment to annotation °604.</i>
	<i>The SS does not specify what conditions on national legislation and domestic trade controls the CITES Secretariat might be expected to set for countries to be eligible to buy raw ivory from South Africa, nor does it propose a mechanism by which such eligibility might be ascertained.</i>

**References:**

TRAFFIC East/Southern Africa, 2002. *in litt.* to TRAFFIC International, Cambridge, UK.