

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES  
OF WILD FAUNA AND FLORA

Seventeenth meeting of the Conference of the Parties  
Johannesburg (South Africa), 24 September – 5 October 2016

## CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

Proposal

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.

Proponent

Swaziland<sup>\*</sup>

Supporting statementTaxonomy

Class: Mammalia  
Order: Perissodactyla  
Family: Rhinocerotidae  
Species: *Ceratotherium simum simum*

Common names: English: Southern white or southern square-lipped rhinoceros

Overview

Rhino horn has been in demand for centuries in the Far East as a carving material and for use by Traditional Chinese Medicine (TCM) practitioners.

This proposal is for Swaziland to sell existing stocks of some 330 kg to a small number of licenced retailers in the Far East and also to sell harvested horn, at the rate of 20 kg p.a., to those retailers. The proceeds from the sale of stocks will raise approximately \$9.9 million at a wholesale price of \$30,000 per kg. That amount will be placed in an endowment fund to yield approximately \$600,000 p.a. In addition, the proceeds of the annual sale of 20 kg will raise a further \$600,000 p.a, bringing total recurrent annual revenue from horn to \$1.2 million. Rhino horn regrows after cropping and the annual sales of 20 kg can be sourced from sustainable non-lethal harvesting of horn.

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<sup>\*</sup> The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

Swaziland's two rhino parks Hlane Royal National Park (est. 1967) and Mkhaya Game Reserve (est. 1980) as well as the Mlilwane Wildlife Sanctuary (est. 1961) where white rhino are likely to be placed, cover an area of 37,500 hectares. These parks have a total population of 73 white rhino.

Proceeds from the sale of horn will greatly ease financial pressure at a time when Swaziland's rhino parks are struggling with the recent surge in rhino protection costs, particularly escalating security requirements to protect the country's rhino populations against the onslaught of criminal poaching syndicates. It will also enable the remuneration of park employees to be improved, which is overdue particularly for the Game Rangers, who serve far beyond the call of duty to protect the country's rhinos against ever increasing dangers. Proceeds will also be used to fund much needed additional infrastructure and equipment, and to cover supplementary food during periods of drought. Swaziland is currently enduring the worst drought in living memory. Proceeds will also be used to provide for sustainable and long-term developments, all of which will ultimately benefit neighbouring communities and Nature conservation initiatives.

These three parks rely on self-generated revenues to survive. They are able to self-fund limited development costs, with the balance coming from generous donors.

#### Species characteristics and distribution

There are five rhino species: white rhino (19,700 animals), black rhino (4,900), Indian Rhino (3,300), Sumatran rhino (220) and Javan rhino (55).

Africa is home to the white rhino (two sub-species), and the black rhino (three sub-species). Their origins can be traced back to the late Miocene, 6 million years ago.

There are only three survivors of the northern white rhino in Africa. These are held in Kenya at Ol Pejeta Conservancy; their re-introduction to Africa from zoos was too late for viability.

Over 90% of Africa's southern white rhino occur in South Africa (about 17,800). Small populations totalling 1,800 animals exist in Botswana, Kenya, Malawi, Mozambique, Namibia, Swaziland, Uganda, Zambia and Zimbabwe all of which were re-introduced from South Africa. There are about 160 held in captivity in China.

White rhino are grazers and occur in South Africa over an area exceeding four million hectares on 36 state protected areas and 330 privately owned game ranches.

White rhino can live to an age of about 45 years. Females breed from the age of six years and a single calf is born after a gestation period of 17 months.

White rhino are grey in colour rather than white and can be identified by their square-shaped lips. They are larger than black rhino (1,000 kg) with males weighing about 2,200 kg and females 1,600 kg and they have a shoulder height of about 160 cm. They have a front horn that is larger than the rear horn. The mean weight of adult horns is  $5.16 \pm 2.0$  kg for the front horn, and  $1.86 \pm 1.0$  kg for the posterior horn. Their horns grow continuously throughout their life at approximately one kg per year.

#### Status and trends

The white rhino population in South Africa has grown from less than 50 animals in 1910 to 7,000 in 1995 and to 17,800 in 2015, with 6,300 (35%) of the species occurring on private land. The growth rate in the population in the period 1995-2011 was 6.5% p.a., net of deaths.

White rhino became extinct in Swaziland due to hunting under Colonial rule. The species was re-introduced to Mlilwane Wildlife Sanctuary in Swaziland in 1965 being a grateful beneficiary of South Africa's Natal Parks Board's wider redistribution policy to spread the risk against extinction. Many were sent to Hlane Royal National Park in the late 1960s and to Mkhaya Game Reserve when secure habitat became available in the 1980s.

White rhino subsequently increased on the Hlane and Mkhaya parks to approximately 120 animals. Poaching during the rhino war of 1988-1992 reduced the number back to 24 animals. Legislation of the time was totally inadequate to address the scourge of crime syndicates with high powered weapons of war. The scale of plunder that descended on Swaziland necessitated the promulgation of preventative rather than remedial legislation to stop rhino being killed rather than have poachers incarcerated; it also equipped

the Game Rangers to deal with a new kind of poaching. Thereafter Swaziland went for 20 years without a single rhino being poached.

A new wave of intensified poaching hit South Africa in 2008 and Swaziland became the closest target to the criminal syndicates orchestrating the poaching. In spite of this and due to the effectiveness of the Swaziland Game Rangers in applying the new preventative legislation, only three rhino have been poached in Swaziland in the last 24 years. Two rhino were lost to horn poachers in 2011, and one in 2014. All three poaching incidents have been conclusively solved. This success can be attributed primarily to the unfailing support of Swaziland's Head of State.

White rhino again flourished on Hlane and Mkhaya under intense security and the new amendments to the Game Act, reaching a population of 90 animals in 2015, only to be severely affected by the worst drought in living memory which was aggravated by water sources drying up and dry season grazing reserves being consumed by an explosion of harvester ants, reducing the white rhino back to 73 animals. With no grass left on the veld it has been necessary to artificially provide fodder from wherever it can be sourced, to feed the rhino and other grazing species sharing their range. As South Africa is gripped by the same drought, fodder is difficult to find and expensive to purchase. The coming season promises to be even more drought stricken going into the dry months with no grass reserves. This will make it even more challenging to intensively manage the country's rhinos to keep them alive. Fodder is currently being stockpiled at enormous cost, and sheds are being built to accommodate it, diverting funds from other important conservation needs.

In addition to the loss of adult stock, new-born rhinos have either perished or been orphaned by their mothers' milk drying up and are being hand reared, and this is expected to be a growing problem in the coming months. It is expected that each surviving calf will cost at least \$12,000 to raise.

#### Habitat

White rhino are grazers and while there is additional habitat in Swaziland outside the parks, competition from people and domestic livestock preclude any possibility of extended rhino range. The security in other available habitats is wanting and does not qualify them at this stage to become rhino custodians.

#### Threats

Any benefits there may have been from prohibiting trade in the past have been totally undermined by the surge in the black market caused by the ban. There were 65,000 black rhino in Africa outside South Africa in 1970 and at their natural growth rate of 6% p.a. that number should have grown to 700,000 today, assuming sufficient habitat. Illegal hunting primarily has reduced that number to 4,900.

Swaziland wishes to avoid a similar outcome for their white rhino.

The record shows that 1,175 white rhino are said to have been illegally killed in South Africa in 2015 (1,225 in 2014). The average cost of protecting one rhino in South Africa is said to exceed \$3,500 pa.

The per capita income in Swaziland is approximately \$7.00 per day, so the opportunity for wrongful exploitation of local citizens by foreign criminals is very high, as is the temptation to hunt illegally. This is even more so for nearby Mozambique, where highly active rhino poaching syndicates are located.

#### National utilization

There is no internal end-use market in Swaziland or Southern Africa for rhino horn for medicinal use or artistic display. There is no investment or speculative interest in horn within Swaziland. There is no trophy hunting of white rhino in Swaziland because all rhinos in the Kingdom occur in Big Game Parks reserves where no hunting is permitted. Despite the provisions of Swaziland's annotation, no trophy hunting has taken place since its approval 12 years ago.

#### Stocks:

A total of 330 kg of legal white rhino horn is kept in stockpiles in various places of safe-keeping within Swaziland. This in itself is an enormous risk and an attraction to criminals. This horn has been collected from the natural deaths of white rhino over many years, or has been recovered from poached Swazi rhino.

Swaziland does not believe in burning or otherwise destroying valuable resources of rhino horn, when conservation agencies across the continent are under-funded and cash strapped. Criminals are further enriched by such destruction which escalates prices on the black market. Swaziland also sees no sense in devaluing its natural resources when they can so easily become added value for the benefit of conservation.

### Illegal trade

There is no legal trade in rhino horn within Swaziland.

Plans for illegal trade have been detected and foiled in highly effective security operations, though there is never any room for complacency. As rhino populations decline elsewhere, and protection activities intensify, so the threat of poaching increases in Swaziland.

### Commonly suggested solutions to illegal killing:

Increased law enforcement is widely advocated but effective law enforcement over large areas is almost impossible and is prohibitively expensive. The cost of rhino protection, and the risks associated with it, are causing many rhino custodians to give up. In South Africa alone more than 200,000 hectares of rhino habitat has been withdrawn from rhinos because the costs of keeping them safely and the bodily risk of doing so has escalated to a level which makes it unattractive to keep rhinos any more. 70 former rhino custodians have given up on rhino conservation. There are only 330 of the previous 400 private rhino owners left in South Africa. In the process habitat has been withdrawn which can sustain 2,500 white rhinos, plus a variety of other grazers. Rhino conservation in the private sector is no longer affordable without substantial finance support which at present is not adequately forthcoming. Yet returns from horn sales could readily provide the necessary funding if this were to be permitted. Furthermore there is nothing like financial independence to enable resistance to corruptive influences.

Demand reduction through changing the Far Eastern appetite for horn is suggested but belief in horn as a medicinal cure has become entrenched over centuries and beliefs will take time to change, if ever. It is unlikely that rhino in Swaziland, and indeed in Africa, will survive the time span required for changing these beliefs.

### Swaziland's rationale for trade in rhino horn

**The ban on trade in rhino horn has been in force for 39 years and it is clearly not working – rhino losses from horn poachers are escalating and driving rhinos towards extinction.** Demand reduction and education, cited as new measures to be tried, are not new at all. They are integral to the ban and have been applied since the ban was put in place but these have not been effective. The ban simply sends the trade underground enriching only the illegal black market.

**At present 100% of the proceeds from the sale of rhino horn are taken by criminals, while rhino custodians pay 100% of the costs of rhino protection and production yet they desperately need funds to cover these costs.** Opening legal trade would immediately soften this disparity and open competition to the illegal trade. Whatever revenue the legal trade attracts will be unavailable to the illegal trade, immediately reducing illicit profits and strengthening protection through legal trade.

Sustainable utilization through commercialization of rare species has been proven to work in enhancing the survival chances of these species. The IUCN espouses the "*wise and sustainable utilization of natural resources*" which is one definition of conservation.

The southern white rhino was brought back from near extinction and has increased from less than 50 animals to 20,000 as a direct result of commercialisation.

The late Dr. Ian Player, a highly accomplished South African Nature conservationist, was instrumental in saving the southern white rhino from certain extinction. Had it not been for his foresight and wisdom, in all likelihood there would be no white rhinos to argue about today.

Player advocated for the sustainable utilization of the white rhino as a natural resource to enhance its value, for it is this value, he believed, which would ultimately determine whether white rhino would survive for future generations to enjoy. In the eve of his life Ian Player advocated strongly and publicly in favour of lifting the ban on trade in rhino horn to enhance survival of the species.

Rhino horn is arguably the most valuable commodity on earth and it has enormous scope to not only fund Nature conservation but also to contribute meaningfully to poverty alleviation and sustainable development for Africa's people, if only CITES would permit this by lifting the ban on trade which has proven to be futile.

#### Sales of live white rhino:

There were sales of 176 white rhino from state protected areas in South Africa to the private sector in 2011 (150 in 2010). These sales raised \$3.6 million for parks. There were sales of 10 white rhinos from South Africa to other parks in Africa in 2011.

Swaziland has sold or exchanged, and exported white rhino bulls to South Africa, and imported white rhino cows for genetic purposes in compliance with the CITES annotation in the down-listing of Swaziland's white rhinos to Appendix II.

#### Regulation of proposed sales:

Big Game Parks, the CITES Management Authority in Swaziland, will be the sole seller and horn will be sold directly to a small number of licenced retailers, which is likely to include Traditional Chinese Medicine Hospitals, in the Far East provided that CITES agrees to the trade and approves Swaziland's trade partners. All horn will be properly documented and recorded on a DNA data base and recorded on a national register and with TRAFFIC. The retailers will be licenced and required to undertake not to buy horn from illegal sources.

Permitted trade will have the added advantage of providing some documented information on formerly illegal trade through legal documentation.

#### Safeguards

The DNA of all horn offered for sale will be recorded in a national register and made available to TRAFFIC to safeguard its integrity.

If for some unexpected reason a legal trade is appropriately judged to be bad for the species, then the proposed legal trade will be closed down by Swaziland.

The trading operation will be open to inspection by the CITES Secretariat.

#### Information on similar species

The only similar species to the white rhino in Africa is the black rhino of which there are approximately 4,900. Among these, there are on record 1,476 in South Africa, 1,957 in Namibia, 678 in Kenya and 472 in Zimbabwe.

The black rhino has a hooked lip and is a browser with the prehensile upper lip being used to gather leaves and twigs. They weigh up to 1,000 kg. Females breed from the age of five and a calf is born after 15 months. A new calf is produced every 30 to 48 months, by which time the previous offspring has become independent. Populations grow at about 7% p.a., net of deaths.

This proposal is restricted to trade in white rhino horn only.

#### Consultations

The Southern African Development Community (SADC) Parties met in South Africa in April 2016 to draft a common position on issues for CITES CoP17. Of the 12 countries present, with the exception of only one country, there was a consensus in favour of rhino horn trade and in support of a trade proposal to CoP 17. Botswana felt that it was premature to submit a proposal to CoP17. SADC countries have been informed of this proposal by Swaziland, as have the two rhino range states that do not fall under SADC, namely Uganda and Kenya. The latter country has consistently declared that it is not in favour of horn trade

Additional comment

Swaziland was expecting South Africa to submit a rhino horn trade proposal to CoP17 and was ready to support it. However, Swaziland was informed on 21<sup>st</sup> April, 2016 that this was not going to happen. That decision gave rise to this proposal by Swaziland at the 11<sup>th</sup> hour.