



*"Embracing Innovation to Conserve the World's Animal Kingdom."*

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17 January 2019

Dear Elaine Kendall,

**Rhino Trophy Hunting and Rhino Horn Trade**  
**CITES CoP18 , 23 May – 3 June 2019, Sri Lanka**

There have been arguments made in the past by Swaziland (now named Eswatini) and South Africa in support of opening up international trade in farmed ("*harvested*") rhinoceros' horn, plus the dubious contribution to conservation of the wild species from trophy hunting and live specimen exports.

Therefore, it was not surprising to see two proposals submitted to the forthcoming Convention on International Trade in Endangered Species of Flora and Fauna (CITES), eighteenth Conference of Parties (CoP18).

**1. Submissions to CITES CoP18**

1.1. There are two submissions of concern with regards to white rhinoceros (*Ceratotherium simum simum*). The fear is that the protection/conservation of rhinoceros will be further undermined by these submissions.

1.1.1. ***"Proposal to remove the existing Annotation to the Appendix II listing of Eswatini's Southern white rhinos to enable full Appendix II status for the species in Eswatini [formerly Swaziland]"<sup>[1]</sup>***

1.1.1.1. *"This proposal is for Eswatini to sell from existing stock 330 kg of rhino horn to licenced retailers in the Far East and also up to 20 kg p.a., including harvested horn, to those retailers. The proceeds from the sale of stocks should raise approximately US\$9.9 million if sold at a wholesale price of US*



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*\$30,000 per kg. That amount will be placed in a conservation endowment fund to yield approximately US\$600,000 p.a.<sup>[1]</sup>”*

- 1.1.1.2. What market/demand modelling and onus on independent, scientifically proven scientific evidence has been accumulated that proves any rhinoceros horn trade from Eswatini's claimed<sup>[1]</sup> rhino population (and export/import of rhino horn so orchestrated) by such a delisting will actually *“be for purposes that are not detrimental to the survival of the species”* as stipulated by CITES?

*“Eswatini'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 in the future, cover an area of 36,500 hectares. These parks have a total population of 66 white rhino after recent drought mortalities (as at end December 2017).”*

- 1.1.1.3. It should be noted that Swaziland's (now Eswatini) submission to CoP17 (CoP Prop. 17)<sup>[2]</sup> indicated that its parks had *“a total [white rhinoceros] population of 73 white rhino”*- more than the current estimated 66 white rhino<sup>[1]</sup>. So there is a clear need to conserve Eswatini's white rhinoceros and not subject them to the potential increased threat of poaching if demand for rhino horn is stimulated:

*“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” – CoP17 prop 17<sup>[2]</sup>*

- 1.1.1.4. If Eswatini was granted the submission<sup>[1]</sup> and the opportunity to trade stockpiles of rhinoceros horn, there is little doubt other CITES parties (such as South Africa) would soon seek the same opportunity. South Africa's rhinoceros are mentioned more in Eswatini's submission<sup>[1]</sup> than Eswatini's own rhino, which suggests this submission<sup>[1]</sup> is really a proxy for South Africa



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to test the water for international trade in *"harvested"* and stockpiled rhino horn.

1.1.1.5. Where is the independent evidence that any opening up of international trade in rhinoceros horn enabled within the submission<sup>[1]</sup> is not likely to stimulate demand and poaching of rhinoceros across the African continent by others seeking to profit? How will protection and security of rhinoceros be enhanced continent wide and guaranteed by the submission as proposed beyond reassurances that income derived might be able to cope with the potential rise in rhinoceros poaching within Eswatini if/when demand increases as a result?

1.1.1.6. There has been much academic analysis of the potential opening up of international trade in rhino horn after over forty years since CITES' 1977 ban on such international trade. The principle of the CITES ban itself has not failed, but the enforcement of the ban has clearly failed (particularly in South Africa)<sup>[3]</sup> with an escalation in rhino poaching since 2007. None of this academic study gives a predominantly positive outcome for such rhino horn trade and deems such trade likely to be beneficial to the survival of the species.

*"Governments, economists and conservationists who think they can curb poaching by selling rhino horn and ivory legally have little understanding of macroeconomics or the sophistication of international crime syndicates<sup>[4]</sup>"*

1.1.1.7. The objective of Alejandro Nadal's and Francisco Aguayo's 2014 paper (*"Leonardo's Sailors: A Review of the Economic Analysis of Wildlife Trade<sup>[5]</sup>"*) was to *"...evaluate the scope and limitations of the economic analysis of wildlife trade that has been carried out in the past three decades."* A few extracts sum up this paper's hard-hitting assessment of the use of 'misguided' economic theory when applied to the wildlife trade:

*"The pro-market argument starts from the premise that poaching and illegal trade are a consequence of trade bans imposed by bodies like*



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*CITES (the Convention on International Trade in Endangered Species of Wild Fauna and Flora).“*

*“One of the most striking features in the economic analysis of wildlife trade is the level of misinformation concerning the evolution of market theory over the last six decades. To anyone who comes in contact with the corpus of literature on wildlife trade, and in particular the literature recommending the use of market-based policies, the uncritical use of theoretically discredited analytical instruments is a striking revelation. Perhaps the most important issue here is the conviction that markets behave as self-regulating mechanisms that smoothly lead to equilibrium allocations and therefore to economic efficiency. This belief is not sustained by any theoretical result, a fact that is well known in the discipline since at least the early seventies.”*

- 1.1.1.8. In a July 2016 study (*“A quantitative assessment of supply and demand in rhino horn and a case against trade<sup>[6]</sup>“*), Dr Barbara Maas of NABU International concludes that opening up ‘legal’ trade has major potential downside risk:

*“Pro-trade proponents have suggested that if things go wrong and poaching escalates further as a result of lifting the ban, rhino horn trade could either be “closed down or restructured” after three or four years. Such plans are both unhelpful and impractical, firstly because it risks setting off an illegal buying and poaching rush to exploit a potentially limited window of opportunity as soon as trade is permitted. Secondly, experience from rising exports of rhino horn as hunting trophies from so called “pseudo hunts”<sup>[7],[8]</sup> in South Africa has shown that it can take seven years (2003-2009) to recognise and address such problems.”*

- 1.1.1.9. Douglas J. Crooks, James N. Blignaut<sup>[9]</sup> (Department of Economics, University of Pretoria) in their 2015 paper, *“Debunking the myth that a legal trade will solve the rhino horn crisis: A system dynamics model for market demand”* concluded:



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*"we find that a legal trade [in rhino horn] will increase profitability, but not the conservation of rhino populations."*

1.1.1.10. Therefore, the weight of academics'<sup>[5],[6],[9]</sup>, key conservationist's<sup>[10]</sup> and ecologist's<sup>[11]</sup> thinking concludes that attempting to influence wildlife trade is often based upon biased priorities (not conservation per se) and a simplistic appreciation of the potential market dynamics and likelihood of negative effects (effects that are detrimental to the wild species).

1.1.1.11. In addition, the November 2013 report, *"The Horn of Contention,"* ("A review of literature on the economics of the rhino horn trade," Economists at Large/IFAW<sup>[12]</sup>) found the following:

*"The formal studies suggest that predicting the outcome of liberalising trade is complex and difficult to determine. Although it may decrease pressure on poaching, as rhino horn becomes increasingly supplied through the non-lethal legal trade, there is also a real risk that trade could drive an increase in poaching through any combination of five mechanisms:*

- *Through legal and illegal markets coexisting and interacting in complex ways.*
- *Through reducing the stigma attached to consumption of the product.*
- *By potentially reducing the supply costs of illegal supply.*
- *By potentially facilitating the laundering of illegal supply in with legal supply.*
- *As a result of uncertainty around the response of illegal suppliers to competition from a legal market."*

*"The articles from the grey literature are all overtly pro-trade, generally assuming that:*

- *Legal markets will "hijack" consumers from illegal markets and that legal and illegal horn would be perfectly substitutable.*
- *Stigma effects are small and that efforts to reduce demand through education and information would be ineffective.*



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- *Increased surveillance funded by rhino horn sales would increase poaching costs.*
- *Technical advances such as DNA technology would minimise laundering.*
- *Smugglers with market power would respond to the introduction of a legal trade passively, accepting reduced sales, rather than competing to retain market share."*

*"Little empirical evidence is offered to support these views. Under certain conditions these assumptions may hold, but it is unclear if these conditions are in place in either supplying or consuming countries. We suggest further research should be undertaken before any formal steps are taken towards legalising trade in rhino horn."*

1.1.1.12. So where are the 'convincing reasons' and independent science to categorically support any proposed trade in rhinoceros horn within the submission<sup>[1]</sup> to show it is likely to benefit long-term global rhino conservation, particularly if Eswatini's submission<sup>[1]</sup> subsequently opens up the opportunity of increased international trade in rhino horn from South Africa?

1.1.2. ***"Transfer of the population of *Ceratotherium simum simum* of Namibia from Appendix I to Appendix II<sup>[13]</sup>"***

1.1.2.1. The submission from Namibia is proposed *"For the exclusive purpose of allowing international trade in:*

- a) live animals to appropriate and acceptable destinations; and*
- b) hunting trophies"*

1.1.2.2. How does seeking to export live specimens to 'appropriate and acceptable destinations' (Annotation A. *"Proposal,"* Clause a)) guarantee to help the conservation of the species in every case? Conf. 11.20 (Rev. CoP17) defines 'appropriate and acceptable destinations' for live animals should be those that ensure that the animals are *"humanely treated"* – how does endorsing the potential export of live rhinoceros (elephants,



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lions, tigers etc. for that matter) to China for commercial gain (whether it is masked as scientific, or zoo exhibits) ensure such animals are and always will be, *"humanely treated?"* For example, China has inhumane tiger farms<sup>[14]</sup> in contravention of CITES Decision 14.69 (2007)<sup>[14]</sup>, so what's to stop the inhumane exploitation of any live specimens so exported to China? If fact, the Eswatini submission<sup>[1]</sup> states *"There are about 300 [white rhinoceros] in captivity in China and elsewhere worldwide"* which begs the question, is that humane treatment?

1.1.2.3. Furthermore, CITES stipulates that for:

1.1.2.3.1. Appendix I Specimens - An import permit *"may be issued"* by the relevant *"Management Authority"* only *"if the specimen is not to be used for primarily commercial purposes and if the import will be for purposes that are not detrimental to the survival of the species."*

1.1.2.3.2. Appendix I and II Specimens - *"An export permit or re-export certificate issued by the Management Authority of the State of export or re-export is required. An export permit may be issued only if the specimen was legally obtained and if the export will not be detrimental to the survival of the species. A re-export certificate may be issued only if the specimen was imported in accordance with the Convention."*

1.1.2.4. So, only an export permit is required for Appendix II specimens (which would apply if Namibia's white rhino delisting<sup>[13]</sup> is granted). But regardless, for either Appendix I or Appendix II specimens, where is the independent, scientific proof that such imports/exports so facilitated will not only be humane, but will not be detrimental to the survival of the species? What if the specimens so exported are really intended to become farmed commodity, which potentially stimulates and legitimizes demand for rhino horn and derivative products (and thereby, increases poaching attrition)?

1.1.2.5. Trophy hunting in Namibia makes an opaque contribution to conservation<sup>[15]</sup>. Namibia's Game Products Trust Fund (GPTF) does not wholly fund conservation societies, but supplies funds for specific needs upon application – for example, upon application a conservation society



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might receive funding for two vehicles, but no conservation society is directly funded by GPTF on an on-going basis.

1.1.2.6. Namibia has an estimated population of 1,037<sup>[13]</sup> white rhinoceros (mostly “*privately owned*”<sup>[13]</sup>), with the population sustained by imports from South Africa (again from “*privately owned*” farmed rhinoceros).

1.1.2.7. Namibia’ submission<sup>[13]</sup> states “*Illegal killing and illegal trade in rhinoceros products constitute the greatest threat to this species.....The second most serious threat is that private owners will be forced to dispose of their white rhinos, which constitute the largest part of the Namibian population, if the costs of rhino protection cannot be offset by the available means of utilization of and trade in this species.*”

1.1.2.8. However, the past trophy hunting of rhinoceros has not always been above ethical reproach, because it has been used as a mask to obtain rhino horn by deception, via pseudo-hunting<sup>[7],[8]</sup>. So, trophy hunting of rhino can be used to supply the “*illegal trade in rhinoceros products*” which Namibia’s own submission<sup>[13]</sup> states “*constitute the greatest threat to this species.*”

## 2. Conclusions

2.1. The threat is, unless the private rhino owners of Namibia are allowed via the submission<sup>[13]</sup> to generate more profits from their utilisation/exploitation of rhino, then the private owner will have to “*dispose of*” their live rhino stocks<sup>[13]</sup>, because the private owners claim that they will not be able to afford increased protection costs. This is why opening up the rhino horn trade as promoted by Eswatini (and South Africa no doubt)<sup>[1]</sup> could have such serious consequences if/when demand is legitimised/stimulated and the poaching threat increases across the entire African continent and beyond as a result.

2.2. But the real question is, does supporting a business model to fund privately owned rhinoceros for hunting trophies<sup>[16]</sup>, rhino horn harvesting<sup>[4],[5],[6],[9],[10],[11],[12]</sup> and live specimen exports<sup>[14]</sup> really mean the wild species is somehow benefitting and being conserved, or does it pose a detrimental threat? Are such privately owned rhino ‘wild’ rhino being conserved for the greater good, or are farmed rhino reduced to imprinted





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specimens of no rewilding conservation value? If the latter, then how is any trade in private, imprinted rhino and derivative products helping the survival of the species in the wild, when such trade potentially increases the poaching threat to wild rhino<sup>[9],[11],[12]</sup>?

- 2.3. It should be noted that CITES has permitted the same, non-conservation driven exploitation of African lions to escalate within South Africa for decades, but this abhorrent exploitation is increasingly coming under external scrutiny and from within South Africa<sup>[17]</sup>.
- 2.4. Regardless of whether a rhino's horn can be harvested from the donor rhino under anaesthetic and the horn eventually will grow back after two years, is that humane and does such exploitation and trade help conserve the wild species? Or is it purely a business model based upon animal exploitation as per African lion (and other big cat) breeding and the lion bone trade<sup>[17]</sup>?
- 2.5. The principle of CITES' 1977 ban on international trade on rhino horn has not failed, but the enforcement of the ban has clearly failed (particularly in South Africa)<sup>[3],[18]</sup> with an escalation in rhino poaching since 2007. Arguably, the use of rhino horn as a symbol of status among Vietnam's burgeoning, wealthy middle-class has been identified as a major driver of the current rhino poaching crisis<sup>[19]</sup>. Rhino horn demand is driven by for 'ornamental' / 'status' use in Asia and by 'medicinal' use (of no proven efficacy), with rhino horn prescribed as a cure for cancer, after rumours perpetuated in Vietnam<sup>[20]</sup> around 2006/06 cited the miraculous cure of a prominent Vietnamese official attributed to the taking of powdered rhino horn:

*“Research reveals that typical users of rhino horn are successful, well-educated men, over the age of 40 who live in Vietnam's main urban centres. They value their luxury lifestyle, which is often based around meeting peer group pressures” – Dr. Jo Shaw, World Wildlife Fund<sup>[21]</sup>*

- 2.6. The demand side for rhino horn is the major driver that should be tackled by increased efforts in demand reduction to conserve the wild rhino species. Pandering to the 'legal' supply of fraudulent (no efficacy) potions and status symbols by supplying rhino horn poses a significant risk to the wild species, with no categorical, supporting science that the risk is worth taking.



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2.7. There is anecdotal evidence<sup>[22]</sup> to suggest that stimulating demand for farmed/“harvested” rhino horn in fact stimulates demand for wild sourced rhino horn, where the wild rhino horn is deemed to have greater value and potency (sic) – thus demand stimulation from farmed/“harvested” rhino potentially exposes wild rhino to an increased poaching risk:

*“Commercial breeding programs are further disadvantaged because of the perception among some buyers that wild products are more valuable. As University of Johannesburg scientist Laura Tensen<sup>[23]</sup> has noted, “wild animals are considered superior because of their rarity and high expense.”*

*“That is especially true for rhinos. Poachers often prove the veracity of their illicit product by showing buyers horns that have been removed from the base of the skull, an extraction method that kills the animal. Only the most conscience-stricken consumer would ensure that horns they purchase are sourced from licensed breeders.”*

2.8. Unless the above questions can be categorically answered to prove, via independent science, that such commercial trade in farmed/“harvested” rhino horn, hunting trophies and live specimens from privately owned/wild rhino has a high probability that it will serve the survival of the wild rhino species across the African continent and globally, then the referenced submissions<sup>[1],[13]</sup> should be rejected.

Yours sincerely,

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