

Import of Elephant Trophies Hunted in Zimbabwe and Tanzania

On November 17, 2017, the U.S. Fish & Wildlife Service (Service) will begin issuing permits to allow the import of sport-hunted trophies from elephants hunted in Zimbabwe, on or after January 21, 2016, and on or before December 31, 2018, for import permit applications that meet all other applicable requirements.

At this time, a suspension on the import of sport-hunted trophies from elephants hunted in Tanzania remains in place.

We are currently evaluating information received from Tanzania and will update this document, located at <https://www.fws.gov/international/pdf/questions-and-answers-suspension-of-elephant-sport-hunted-trophies.pdf>, if changes to the suspension are made.

Questions & Answers

ZIMBABWE

Why has the Service decided to allow the import of sport-hunted trophies from Zimbabwe?

Sport hunting, as part of a sound wildlife management program, can provide benefits to conservation. When the Service announced an interim suspension on the import of elephant trophies from Zimbabwe on April 4, 2014, we based our decision on the limited information available to us, and we based subsequent findings in July 2014 and March 2015 on the information available to us at those times. Since that time, the Government of Zimbabwe, non-governmental organizations, safari outfitters, professional hunter associations, and individuals provided the Service with additional information regarding the management and status of Zimbabwe's elephant population demonstrating that the facts on the ground have changed and improved.

This additional information has addressed concerns raised by the U.S. Fish and Wildlife Service (Service) in previous findings and we are now able to find that African elephant trophy hunting in Zimbabwe will enhance the survival of the species in the wild. This enhancement finding is required prior to allowing import of elephant trophies under our Endangered Species Act (ESA) regulations.

What's changed in Zimbabwe compared to previous findings?

In previous findings in which we were unable to make a positive enhancement finding, the Service outlined specific concerns about Zimbabwe's elephant hunting and management programs. All of these concerns have been addressed as follows:

- **Elephant management plans:**

- Previous findings: Available information showed unclear progress toward goals and objectives of Zimbabwe's elephant management plan, which consisted primarily of two outdated documents (1996 and 1997).
- What's changed: On January 21, 2016, Zimbabwe adopted the Zimbabwe National Elephant Management Plan (EMP) that replaced the two previous outdated documents. The EMP incorporates an adaptive management framework with higher-level targets, key components, strategic objectives, and outputs. The plan also identifies measurable outcomes and timelines so that Zimbabwe's Parks and Wildlife Management Authority (ZPWMA) can monitor the

success of the management plan and address newly emerging concerns and long-term management needs. The EMP was developed with input from a broad range of stakeholders, including government officials, rural community leaders, safari outfitters, landowners, and non-governmental organizations.

- **Population status:**

- Previous findings: The Service had inadequate information to confirm the status of Zimbabwe's elephant population.
- What's changed: In 2014, the Pan African Aerial Elephant Survey (<http://www.greatelephantcensus.com/>), or the Great Elephant Census (GEC), was carried out over a significant portion of the savanna elephant's range in Africa. This survey provided ZPWMA with a better population estimate to assess future hunting quotas, management efforts, and anti-poaching activities. Both the GEC and a 2016 report from the IUCN African Elephant Specialist Group estimate the elephant population in Zimbabwe to be more than 80,000 elephants. These results are more reliable and provide a better basis under the newly adopted EMP for establishing management priorities than previously available information.

- **Implementation and enforcement of laws and regulations:**

- Previous findings: If properly implemented, the ZPWMA regulatory mechanisms for managing elephants appeared to be adequate. The key issue was whether a suitable accounting system was in place and if data from that system could be used to document the financial benefits U.S. hunters provide for elephant conservation.
- What's changed: The Service has received information regarding the Tourism Receipts Accounting System (TRAS) and its web-based system (TRAS2) under which the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, can track all revenue generated through hunting activities. Under this system, all authorized hunts are registered, allowing for the capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. Effective implementation of this system will provide data that was not previously easily obtained to greatly improve the tracking of hunting revenue to document the financial benefits U.S. hunters provide for elephant conservation.

- **Hunting quotas:**

- Previous findings: The Service had not received sufficient information on how hunting quotas are established and whether other forms of offtake, such as poaching and problem animal control, were taken into account.
- What's changed: With the establishment of the EMP, there appears to be a more systematic, scientific approach to establish national quotas. ZPWMA starts with a quota of 500 elephants. Before dividing this quota among safari outfitters and landowners, they consider the results of the GEC survey and any subsequent surveys, results from research efforts, the size of the hunting area in relation to elephant habitat requirements, illegal off-take and other forms of off-take, how hunting areas are managed in relation to land use or fencing, human-wildlife conflicts that have occurred previously, and recommended sustainable off-take levels developed based on ecological assessments of the hunting area. This information is then further evaluated in light of other species within the hunting area, past elephant trophy quality, and community benefits of proposed harvests.

- **Revenue generated from sport hunting:**

- Previous findings: The Service did not have current information on how funds generated from elephant sport-hunting are utilized and could not confirm whether revenue generated through sport hunting actually provided an incentive to local communities to conserve elephants.
- What's changed: On communal lands in Zimbabwe, the protection of elephants falls primarily under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which encourages reductions in human-elephant conflicts through conservation-based community development. CAMPFIRE has provided more information on how their programs support the conservation of elephants and provide benefits to and promote greater tolerance of wildlife in rural communities. An overarching analysis of CAMPFIRE, supported by a grant of 12 million Euros from the EU, is currently being conducted and is scheduled to be completed by the end of 2017. The Service will request a copy of the EU funding review of CAMPFIRE that should be finalized by the end of 2017.

- **Lack of government support:**

- Previous findings: The Government of Zimbabwe, and also local governing bodies, did not appear to sufficiently support the conservation work being carried out by a number of non-governmental entities, including individual land owners or lease-holders, safari outfitters and conservancies.
- What's changed: There are strong indications that the efforts of private landowners and consortiums to manage elephants within their areas of control have received greater support from ZPWMA and the broader Zimbabwe government. The Parks and Wildlife Act delegated authority to manage and benefit from wildlife on communal and private lands to the landholders. ZPWMA is engaging private players in co-management in some areas and entering into long-term lease agreements (10-25 years) to manage some protected areas. In certain areas, ZPWMA is reportedly collaborating with safari operators; in others, they collaborate with non-profits, such as the Tashinga Initiative in the Zambezi Valley and WWF in the Hwange-Sanyati Biological Corridor.

For detailed information on the Zimbabwe decision, please refer to the ESA enhancement finding at <http://www.fws.gov/international/pdf/enhancement-finding-2017-elephant-Zimbabwe.pdf>

Why is January 21, 2016, the date that was selected to allow import of sport-hunted elephant trophies from Zimbabwe?

On January 21, 2016, Zimbabwe adopted the Zimbabwe National Elephant Management Plan, which lays out clear objectives, action items, and outputs to facilitate a more systematic management regime for African elephants than was previously established in Zimbabwe.

Do I need a permit to import a sport-hunted trophy from an elephant hunted in Zimbabwe?

Yes. The African elephant rule under section 4(d) of the Endangered Species Act requires an import permit for **all** African elephant sport-hunted trophies. You will also need to obtain an export permit from [Zimbabwe's CITES Management Authority](#). Hunters may import up to two African elephant trophies per hunter per calendar year. Visit our sport-hunted trophies permits webpage at <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies.html> for additional information.

I hunted an elephant in Zimbabwe while the suspension was in place. Can I now import the trophy?

In some cases, yes. Trophies from elephants hunted in Zimbabwe on or after May 12, 2014, and before January 21, 2016, are not affected by the November 2017 enhancement finding and cannot currently be imported into the United States based on the available information concerning the management and status of African elephants in Zimbabwe during that time. You will need to provide documentation to show that the elephant was hunted outside of that time frame and obtain required permits. Visit our sport-hunted trophies permits webpage at <https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies.html> for additional information.

How will the Service ensure that Zimbabwe's elephant hunting and management program continues to meet these requirements?

In the next few months, we will send a letter to ZPWMA requesting the following information:

- An up-to-date report on the progress that has been made implementing the Zimbabwe Elephant Management Plan (2015-2020), including the status of each action item identified in the plan and progress on meeting the goals of that action.
- A report generated through the TRAS2 system identifying hunting revenue for 2016 and, if available, 2017. In addition, an accounting of the funds generated by each of the U.S. hunters who took elephants in 2016 up to July 2017. This accounting should be broken down by hunter (hunter's name would be redacted) and should include money provided to ZPWMA, CAMPFIRE, or other agencies. (A similar report will be requested from each hunter for comparison).
- Annual reports on implementation of the elephant plan, including budgets allocated for elephant management and specific activities undertaken for anti-poaching and reduction of human-elephant conflict.
- Additional information on elephant distribution and population trends with respect to land custodianship/land use.

Further, the Service will be requesting a copy of the EU funding review of CAMPFIRE that will reportedly be finalized by the end of 2017. This information will be used to evaluate the current finding and will be incorporated into a revised finding in 2019.

TANZANIA

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

For elephants hunted in Tanzania in calendar year 2015, the Service was not able to make the findings necessary to allow the import of sport-hunted trophies. 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 will be denied.

Why did the Service make this decision?

In 2014, questionable management practices, a lack of effective law enforcement, and weak governance resulted in uncontrolled poaching and catastrophic declines in Tanzania's elephant population. For 2015, while a number of positive steps were 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.

Has a decision been announced about the import of sport-hunted trophies of elephants hunted in Tanzania in 2016 and beyond?

No. We are currently evaluating information received from Tanzania and will update this document, located at <https://www.fws.gov/international/pdf/questions-and-answers-suspension-of-elephant-sport-hunted-trophies.pdf>, if changes to the suspension are made.

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>
 - November 16, 2017, finding – <http://www.fws.gov/international/pdf/enhancement-finding-2017-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>
 - 2014 finding - <http://www.fws.gov/international/pdf/enhancement-finding-2015-elephant-Tanzania.PDF>