

Conversation Contents

Zimbabwe elephant import ban

John Johnson (b) (6) >

From: John Johnson <(b) (6)>
Sent: Mon Dec 11 2017 12:04:39 GMT-0700 (MST)
To: <(b) (6)>@fws.gov, <exsec@ios.doi.gov>
Subject: Zimbabwe elephant import ban

Gentlemen: I am one of many hunters affected by the elephant import ban instituted by FWS in 2014.

I booked my elephant hunt in January of 2014 with Charlton McCallum Safaris for the Dande East Safari area to take place in April of 2015. After the elephant trophy ban was instituted in April I had the opportunity to either cancel or postpone my hunt, and chose not to do so. I was going for the experience of hunting an elephant bull, and I had seen, first hand, the benefit to the indigenous communities of sport trophy hunting in the Dande Safari area in 2011 when I went on a buffalo and plains game hunt. I was impressed by the attitude of the locals regarding the protection of the wildlife and I was astounded at how they valued virtually every part of the animal once they were killed. I am not aware of any part of the world that utilizes every scrap of a harvested animal with the exception of the intestinal contents. During my 2011 trip I had the opportunity to observe a hippo being taken by another hunter. After the hippo was taken he was dragged up on to a sandbar. The head and hide were removed and then the local village was allowed to butcher the animal for their consumption. This occurred at approximately 11:30 a.m. Upon returning to the location at 3:30 p.m. that same afternoon, the only evidence of the hippo remaining was a large bloody spot. Virtually every scrap of that animal was utilized by the local village.

I knew when I returned from my trip that many people were going to ask me why I chose to hunt an elephant. After taking him at about 11:45 that morning, we began the recovery at about 1 p.m. At 2:30 p.m. we left the scene, and returned the following morning at about 9:00 a.m. The only remains of the elephant were his penis, the stomach contents, and a couple of bones that did not have enough meat on them to even make soup with. I have both the recovery and the "day after" on a video that is only about 4 minutes long in total (the photographer used time lapse to film the entire process and then speed it up). No one who has ever viewed this video has questioned me about taking this elephant again. I was told by the local village elder that my elephant was going to feed at least sixty families for at least three months.

I am a veteran of the U.S. Army and a retired veterinarian. While I consider myself a strong conservative (and a dedicated Trump supporter) I do not think it is appropriate for FWS to have passed this ban without considering U.S. citizens who had invested their time and treasure to hunt in Africa.

Charlton McCallum Safaris publishes their books showing their investment in the local economies. These figures are available to the general public, thereby dispelling any incorrect information regarding how important hunter's dollars are to the sustainability of African wildlife. They also spend large sums of money on anti-poaching, which, next to habitat loss, is the largest danger to African wildlife.

My ivory still sits in Charlton McCallum's safe in Harare. I hope to be able to bring it home sometime soon.

Thank you for your consideration.

John R. Johnson, D.V.M.

(b) (6)

Conversation Contents

Fwd: Bernhardt comments on elephants

"Hoover, Craig" <craig_hoover@fws.gov>

From: "Hoover, Craig" <craig_hoover@fws.gov>
Sent: Wed Dec 06 2017 11:09:14 GMT-0700 (MST)
Gavin Shire <gavin_shire@fws.gov>, Laury Parramore <laury_parramore@fws.gov>, "Sheehan, Gregory" <(b) (6)@fws.gov>, Gloria Bell <gloria_bell@fws.gov>, Barbara Wainman <barbara_wainman@fws.gov>
To:
Subject: Fwd: Bernhardt comments on elephants

FYI, the Zim issue did come up in questions during the recent Hill hearing that David Bernhardt testified at. Dialogue below.

KAPTUR:

But my second question is what about the -- is the department reconsidering the import of trophy elephants based on what the president has done? Is it rescinded?

BERNHARDT:

The department is absolutely reviewing the program across the board, and absolutely doing that.

CALVERT:

All right.

KAPTUR:

You put a stay on it for the moment there...

BERNHARDT:

So the -- as it relates to Zimbabwe, there was a suspension of an endangerment finding. That was modified, and that has been re-suspended.

--

Craig Hoover
Chief, Division of Management Authority
International Affairs
U.S. Fish and Wildlife Service
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Falls Church, VA 22041-3803
ph: 703-358-2162
www.fws.gov/international

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Conversation Contents

Zimbabwe & Zambia Elephant & Lion Import Permits

Richard Meyer <rich.meyer@qwestoffice.net>

From: Richard Meyer <rich.meyer@qwestoffice.net>
Sent: Fri Dec 01 2017 14:40:47 GMT-0700 (MST)
To: <(b) (6) @fws.gov>, <exsec@ios.doi.gov>
Subject: Zimbabwe & Zambia Elephant & Lion Import Permits

Dear Secretary Zinke and Deputy Sheehan:

Having recently hunted in Zambia and Zimbabwe, I believe it is imperative to the conservation of their elephant and lion populations that the Fish & Wildlife service issue permits to U.S. citizens to import their elephant and lion trophies from these countries.

Zimbabwe and Zambia desperately need the revenue from American hunters to support their wildlife conservation programs. Removal of Robert Mugabe as president renews hopes that funds from hunting activities will go for the intended conservation programs and not to corrupt politicians.

If African wildlife cannot contribute to the African economy, it will be a nuisance to the population and result in its extermination. Raymond Bonner did an extensive economic evaluation of benefits of big game hunting in Africa in At the Hand of Man published in 1993.

Failure of the U.S. Fish & Wildlife Service to issue permits for legally taken hunting trophies from these countries will have the unintended consequence of the extermination of those species.

Thank you for your consideration.

Richard Meyer
Attorney at Law
104 N 7th St
Estherville, IA 51334

Conversation Contents

Confirmation of Zimbabwe's Cabinet

Fulton U Mangwanya <fmangwanya@zimparks.org.zw>

From: Fulton U Mangwanya <fmangwanya@zimparks.org.zw>
Sent: Fri Dec 01 2017 09:05:52 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
CC: <pgandiwa@zimparks.org.zw>, <rmandisodza@zimparks.org.zw>
Subject: Confirmation of Zimbabwe's Cabinet

Dear Greg > > Greetings to you and hope this email finds you well. Following the changes that happened recently in Zimbabwe in our government, I found it necessary to inform you that our Cabinet has been appointed and Zimbabwe Parks and Wildlife Management Authority is now under the Ministry of Environment, Water and Climate that will be led by Hon. Minister Oppah Muchinguri-Kashiri (as per previous arrangements) with Mr Prince Mupazviriho as the Permanent Secretary for our Ministry. > > We have welcomed this development as it brings continuity in the Ministry and the wildlife sector. > > Looking forward to continue engaging with USFWS and waiting for a kind answer to our letter dated 20 November 2017, I hope to see you again in the very near future. > > Sincerely, > > Fulton Mangwanya > DIRECTOR GENERAL > Zimbabwe Parks and Wildlife Management Authority > > >

Conversation Contents

Please Support Elephant Trophy Imports

Randy Norris (b) (6) [REDACTED]om>

From: Randy Norris <rknorris1964@gmail.com>
Sent: Mon Nov 27 2017 08:21:11 GMT-0700 (MST)
To: <(b) (6) [REDACTED]@fws.gov>, <exsec@ios.doi.gov>
Subject: Please Support Elephant Trophy Imports

Dear Mr Sheehan and Mr Zinke

I would ask that you support the lifting of the suspension on the import of elephant trophies from Zimbabwe and Zambia. Both Countries have larger herds now than 25 years ago thanks in part to their governments management practices and the support of the local operators. This is because of better habitat, management and enforcement and as a side benefit it creates local jobs and provides food also to the locals. Without the revenue from big game hunters from the United States there will be an increase in poaching and a decrease in enforcement and management practices as these countries will not have the resources to provide these services.

Thank you for your consideration

Robert L Hixson, Jr.
P O Box 816028
Dallas, Tx 75381

Conversation Contents

Conservation and Hunting Ban Issues - Africa (Zimbabwe)

Pete Fick <petefick@gatorzw.com>

From: Pete Fick <petefick@gatorzw.com>
Sent: Thu Nov 23 2017 21:57:40 GMT-0700 (MST)
To: <(b) (6) @fws.gov>, <exsec@ios.doi.gov>
CC: "Charles Davy" <charles.m.davy@gmail.com>, "Mazunga Safaris" <mazunga@mazsaf.com>
Subject: Conservation and Hunting Ban Issues - Africa (Zimbabwe)

Dear Secretary Zinke and Deputy Director Sheehan

For us in Africa we remain extremely concerned about foreign politics negatively affecting our conservation efforts of our wild life, so hopefully we can open up direct dialogue with both of you to furnish all facts pertaining to hunting and conservation in Zimbabwe.

The Buby Valley Conservancy will also be forwarding you relevant data on that area, as I will be doing too. Please let us know whatever you need from our end.

Below is one of the various emails I sent to USFWS during mid 2016 (copied to various embassies) – they never acknowledged receipt of such or opened up any form of dialogue. Most distressing, they would not accept the thorough elephant survey completed by experts within Zimbabwe, which categorically showed a population of over 82 000 elephant, even though not all areas were surveyed. I myself spent 7 years within the Zimbabwe Department of National Parks during the early to mid 1980`s – back then highly experienced biologists/scientists worked out, after thorough research, that the entire country could handle a maximum of 35 000 elephant. There is less land available today than 30+ years ago for elephant. How much more factual and scientific evidence do we need to ?

As many of the key role players in conservation and hunting from Africa will be travelling to the United States in January, would it not be possible to arrange a meeting at your convenience with you between the Dallas and SCI conventions ? I expect that this could clear up many issues that you may have. I could get various role players from around Africa on board with this so please let me know.

Kind regards
Pete Fick

From: Pete Fick [mailto:petefick@gatorzw.com]
Sent: Wednesday, 15 June 2016 8:32 AM
To: Tim Van Norman (tim_vannorman@fws.gov)
Cc: mazunga@mazsaf.com; John.Culley@fco.gov.uk; 'PlemonsKL@state.gov'; 'CorkeyCT@state.gov'; 'Amanda.Mcgregor@international.gc.ca'; 'Severin.MELLAC@eeas.europa.eu'; 'Joel.Mcgregor@dfat.gov.au'; 'Michele.SHCIVO@eeas.europa.eu'; 'Tom.Oppenheim@fco.gov.uk'; 'PlemonsKL@state.gov'; 'Patrice.Laguerre@international.gc.ca'; 'MeyersRL@state.gov'
Subject: Lion Trophy Ban Buby Valley Conservancy (BVC.) USFWLS BAN.

Director USFWLS

Dear Tim

Please can you advise how far USFWS has got regarding the uplifting of the lion trophy ban ? We want to inform our US clients accordingly that are scheduled for hunts. Further the BVC needs to take a very serious look at our over populated lion numbers (last year`s count by Dr. Byron Du Preez was

approximately 530 lion and no doubt many more have been born since then.)

Sadly, since we posted on social media that we are looking for suitable homes for 200 excess lions the only suitable areas that could take lions are a couple of million acres mostly in Mozambique. However, these are hunting areas (that operators have done a great job in protecting and bringing the wild life back. One of these areas in the Zambezi Delta is flourishing with game but there no longer exists a single lion in the area). All have stated they would love to have lions but due to the ban are no longer interested, for obvious reasons. How ironic too that not one of the anti-hunting organizations such as Born Free, Lion Aid etc. have not contacted us to see if they could help – this really makes one wonder.

I am personally very concerned for the future of our lion population on the BVC – the area cannot afford to keep so many lions when there is zero monetary value on them. It is very obvious to us that our lions have killed 50% + of our giraffes (we used to have one of the largest giraffe populations in the country) and huge numbers of other species have been affected too, such as eland, sable, buffalo, cheetah, nyala etc.) It has and always will be BVC policy to manage the area to the best of our ability for all our wild life species (not just lions or rhinos).

Regrettably the loss of income from lion and elephant hunts is drastically affecting our rhino poaching operations (we have never lost an elephant to poaching and instead yearly we have more elephant breaking in rather than leaving our sanctuary, this year an extra 39 elephant have come in so far.) We have lost 5 rhino this year + another two were wounded. Last year we lost 32 rhino even though the BVC itself spent \$500K+ trying to save them . How sad too that no organizations/countries are coming forward offering us funds lost to combat the critical rhino poaching issue, especially the very countries that have affectively taken this income away from us.

As you are aware, the Zimbabwe Department of National Parks have implemented a very strict lion hunting policy that will effectively control any abuse of such species. A board consisting of various role players and scientists will ensure this is in fact controlled properly for the wellbeing of all our wild lions. You are further aware that our ZimParks main income is derived from sustainable and ethical hunting (certainly not ecotourism) so their own efforts to conserve the Parks areas are vastly hampered due to huge loss of income caused by these bans – not to mention the poor rural folks that suffer the most.

How interesting that every reporter/journalist that was anti-hunting prior to visiting the BVC have all seen the light and changed their stance totally once having seen the area first hand. I sincerely hope that the powers that may be in the US and other countries put their personal emotional and political agendas to the side and do the right thing for the actual wild life itself in our part of the world. It's a very sad fact that many of the people/governments that keep preaching their own ideals to save Africa's vast wild life species have actually become the largest threat to our wild life. Sadly many of the true conservationists on the ground are being penalized for having accomplished amazing conservation successes.

Tim, I would really appreciate it if you could advise us accordingly, regardless of USFWLS final decisions.

Respectfully
Pete Fick
BVC
Zimbabwe

"There's no substitute for honesty, ethics and fair chase."

c/o Mazunga Safaris
8 Norfolk Road
Hillside
Bulawayo
Zimbabwe

Office Telephone Number: +263-9-241425
Mobile Number: +263-772 278 779

Conversation Contents

I Support the Elephant Decision

Tim Macmanus <tim@safaritime.com>

From: Tim Macmanus <tim@safaritime.com>
Sent: Thu Nov 23 2017 12:23:39 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: I Support the Elephant Decision

Deputy Director Sheehan,

I just want you to know that I support the US Fish and Wildlife Service finding to allow import of elephant trophies from Zimbabwe and Zambia. That finding was based on science and not emotion. I appreciate the members of the FWS who worked on this finding and their courage in following facts and not emotion.

Appreciate your hard work to restore freedom and sustainable use to our National Parks and Forests across this great land of ours.

Adios,

Tim

Tim Macmanus
O - 972-769-8866
C - 972-977-4590
Have a Fantastic Day!
Proverbs 3.5-6

Conversation Contents

Import ban on Afrian ivory

Gregory Martin <tamu72@msn.com>

From: Gregory Martin <tamu72@msn.com>
Sent: Thu Nov 23 2017 12:02:08 GMT-0700 (MST)
To: "(b) (6)" <[REDACTED]@fws.gov> <[REDACTED]@fws.gov>
Subject: Import ban on Afrian ivory

Dear Mr. Sheehan, I am writing to ask for your support in removing the ban on importing ivory from Zimbabwe and Zambia. The impact of this ban imposed by the previous administration has had some terrible consequences for both the wildlife and the people who are stakeholders, most especially in Zimbabwe. I have traveled to Zimbabwe a number of times and have seen first hand the benefits that controlled hunting as an industry has, versus the devastation of uncontrolled poaching. Keeping the ban in place will trigger more and more poaching of all wildlife, since there is greatly reduced resources to preserve and protect these animals. If the animals lack economic value, the poachers kill for profit and the locals kill to reduce competition for their cattle. The environment degrades from the over grazing, and the overall economy suffers from the loss of tourism and hunting industry dollars. Without hunters spending their money, there simply is no substitute source of anti-poaching resources. And the hunting industry's employment of locals in a country (Zimbabwe) with a 95% unemployment rate is at risk of being reduced to a negligible practice. The number of elephants taken by trophy hunters in a year is inconsequential to their population. But the money spent by those hunters is critically important. In Africa - as I'm sure you've heard many times - if it pays, it stays. Please support lifting the ban. Yours truly, Greg Martin Paradise Valley, Arizona

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Positive Enhancement Finding - USFWS on Elephant in Zimbabwe and Zambia

Attachments:

/57. Positive Enhancement Finding - USFWS on Elephant in Zimbabwe and Zambia/1.1 IMG_7133 3.jpeg

Todd Cusick <toddcusick@me.com>

From: Todd Cusick <toddcusick@me.com>
Sent: Thu Nov 23 2017 09:30:48 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Positive Enhancement Finding - USFWS on Elephant in Zimbabwe and Zambia
Attachments: IMG_7133 3.jpeg

Dear Mr. Sheehan:

Happy Thanksgiving from a fellow Utahn! (I think that is what we call ourselves?)

Attached you will find a photo of yourself sent to me by my friend in Arusha, Tanzania, Mike Angelides. He was honored to meet you. He likes people from Utah and appreciated the fact that you listened to him sincerely.

From September 2, 2017, through October 17, 2017, I split my time in the bush of Africa between the Caprivi Strip in Namibia where Zambia, Zimbabwe, Botswana, and Namibia meet and southwest Tanzania near Lake Rukwa at approximately 7 degrees 23.25 South and 32 degrees 29.52 East. I am NOT sending you talking points prepared by some interest group but rather my first hand experience regarding the above topic and some additional thoughts. I am an outdoorsman and hunter and support the positive finding.

Caprivi Strip

There are simply too many elephants for the habitat in this area and the animal/human conflict is very high. I hunted elephant in this area. I approached over 3,500 elephants in the first 10 days (this was my first elephant hunt and I very carefully kept track and was concerned about whether I felt I was doing the right thing by hunting elephant; unquestionably I was). We chose to harvest a very old bull who was estimated to be over 53 years old by the presence of the last set of worn-out molar teeth they receive at approximately 49 years old. He was on the edge of a herd of 200+ elephant, well past breeding age, and not allowed in the middle of the herd by the other mature animals. There were large areas where there was no tree standing over 4-5' high due to the destruction this overpopulation is causing; it looked like a large bomb went off and wiped out all vegetation.

While hunting we provided full time jobs for 22 local people and 3 Namibian citizens who live further south. We provided much-needed protein to the locals including 2 buffalo and 1 kudu harvested at the request of the Minister of Environment of Namibia in order to have meat for an anti-poaching meeting and training in Rundu. I estimate we provided nearly 15,000 pounds of meat to the locals in 10 days. The lady who was in charge of dividing up the meat among the locals asked if we would please shoot more elephant as they are overrunning their village. It was interesting to note the evidence of poaching from the Botswana border. There was a Namibian government anti-poaching patrol in the area who we reported it to but they were out of fuel and could not pursue those who had poached 2 cow buffalo. If we do not put a value on the wildlife via hunting the locals will not protect it. It is that simple.

I was not treated kindly by some European travelers who noticed we were hunting (as we were permitted to) in the Bwabwata National Park. While I contributed over \$100,000 to the preservation of wildlife they paid \$3 USD per person to enter the same area. Who is really valuing and preserving wildlife in this equation? Which activity do you think the locals will value and therefore self-manage their anti-poaching? Mine or the European tourists on their self-guided tour with a rented Toyota Truck and pop-up tent? I am not suggesting they should not be allowed to participate in their activity but I think we need to be realistic about which activity is POSITIVE for wildlife preservation.

Because of this I am baffled by the media reports I read regarding this issue. It is completely counter to my experience.

Southwest Tanzania

The elephants in this area are suffering and elephant hunting is not advisable for this area at this time in my opinion. It is also interesting to note that they do not hunt elephant in this area; this is not due to habitat but simply due to the years of poaching depleting the herd and the current USFWS ban on imports. The only anti-poaching that is done in this vast area is done by the operator of the concession I hunted in who has now been in this area for about 10 years (you met him). If he is not there the poachers are. We ran off 3 poaching groups and discovered a threatening message left us by a poaching group written on the side of a cut log with charcoal. The message asked us to leave the area so they could get some food; it was written in swahili so I was relying on the locals for interpretation but that was their basic response when I asked what the message stated. In this area two years I harvested a buffalo that contained poacher's muzzleloader balls in its neck. It would be more effective for the locals to have me pay to hunt buffalo and give the locals the meat like I do each time anyway.

I have hunted this area with this operator for years. I have noticed an increase in elephants each year. It seems to me that if this operator is allowed to continue to manage this area the elephant population will continue to increase to a point that sustainable hunting could occur and would benefit the elephant herd. Once again, hunting is the only activity that puts enough value on the wildlife that the locals will consequently protect it.

On another note, importation of lion by the USFWS is currently not allowed in this area. I know this because I have a pending application for import that has been sitting in some "black-hole" with the USFWS for over a year with no response other than an acknowledgement of receipt. Here is my experience. There are so many lion in this area we could not hunt leopard because most any bait we placed was taken by lion before the leopard could get to it. Mike finally did get me on a leopard and admittedly I missed cleanly. It was a great experience anyway.

Once again, I am baffled by the media reports I read regarding the African lion; at least in my experience in the areas I have been.

In conclusion I have one more point to make. Sporting hunting in Africa is an important part of their economy just as skiing is where I live in Utah. The Africans don't come to Utah and tell us how to manage our skiing environment. We know the value of it and manage it accordingly; those

ski operators who operate on federal lands are held accountable for the rules in doing so but not by a foreign government. I think the U.S. government goes a little too far in telling the African governments how to manage their sport hunting. I agree that they could use some guidance, support, communication of our concerns, education, monitoring, and possibly at times some importation permit management, however, the consistent response I received from local people was "you U.S. people think you can see a CNN report or read a National Geographic article and you are all experts on how we should manage our wildlife."

Feel free to contact me at any time. Thanks for your service. My next door neighbor is the new congressman for Utah (Curtis) and I have come to realize very quickly by watching him that these jobs in Washington are a service with a capital S.

Sincerely,

Todd Cusick
801-850-3108
515 Sheffield Drive
Provo, UT 84604

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USFWS Invitation to Zimbabwe

Attachments:

/58. USFWS Invitation to Zimbabwe/1.1 image001.png
/58. USFWS Invitation to Zimbabwe/1.2 USFWS Invitation to Zimbabwe.pdf

Roseline Mandisodza <rmandisodza@zimparks.org.zw>

From: Roseline Mandisodza <rmandisodza@zimparks.org.zw>
Sent: Thu Nov 23 2017 09:22:18 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
CC: "Fulton U Mangwanya" <fmangwanya@zimparks.org.zw>, "Geofreys Matipano" <gmatipano@zimparks.org.zw>, "George Manyumwa" <gmanyumwa@zimparks.org.zw>
Subject: USFWS Invitation to Zimbabwe
Attachments: image001.png USFWS Invitation to Zimbabwe.pdf

Dear Gregory,

I hope this email finds you well. Kindly find attached to this email an invitation to Zimbabwe by the Government for you to come and have an appreciation of our elephant conservation and management.

We hope very much that this invitation is acceptable to the USFWS and the Government of US.

Kind regards

Roseline L. Mandisodza-Chikerema | Chief Ecologist | Cell: +263-772 433907 | Direct line: +263 4 707628 | Email: rmandisodza@zimparks.org.zw

cid:part.1-nefwsFqYKfEuFgAcmBMwRAYxMgdAhowK4hanf4FA\$2710556.79087244@inline-image.com

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Conversation Contents

Elephant Imports from Zimbabwe and Zambia

Mary Ann Justus <john.justus@icloud.com>

From: Mary Ann Justus <john.justus@icloud.com>
Sent: Thu Nov 23 2017 07:17:14 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Elephant Imports from Zimbabwe and Zambia

Dear Deputy Director Sheehan, I wrote you earlier in the week urging you to do all you can to keep President Trump from overturning the positive enhancement findings for Elephant hunting by USFW. I am sure the President and yourself are being inundated by anti-hunting organizations to stop the legal hunting of Elephants in these countries. I wanted to provide some scientific facts to support the continued legal hunting of Elephants from these countries. First, overall populations of Elephants from these countries is stable or in the case of Zimbabwe is increasing. Drammatically, in fact. The number of Elephant in Zimbabwe has increased from about 4,000 animals in 1990 to over 82,000 today. Secondly, the number of Elephants taken legally by hunters in these countries is extremely small, almost negligible, while the revenues generated by legal hunting contribute millions of dollars for anti-poaching, community development, provide much needed protein for local villages etc. This money allows Elephants to flourish in their native habitat, not just in the national parks which make up just a small portion of the country. It is clear, when there is value associated from these Elephants that comes from hunting, the local communities do their part to protect the species. I have seen that myself. Finally, both of these countries have sound regulations in place to ensure that legal hunting of Elephants will enhance the overall populations of Elephants. Besides, there are not that many hunters that have the desire and can also afford the cost of an Elephant hunt. This is not a complaint. it is simply that these large fees are required to provide the necessary funding to provide the enhancement needed. I only mention this because it will not be a case where "the flood gates will open" to large numbers of Elephant hunters and resulting increase in animals taken. That number will remain small. I do hope in the end, that facts will be used to make this determination. i am a hunter and likely biased in my opinion. However, when the facts are reviewed, there is no question that legal hunting of a small number of Elephants does enhance overall populations. All we as hunters ask is that this decision is made based on facts, with the species in mind and not based on emotion or dislike for us as hunters. Best regards, John Justus

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Please allow ivory import from Zimbabwe

Kadi Burkhalter <kadir.burkhalter@gmail.com>

From: Kadi Burkhalter <kadir.burkhalter@gmail.com>
Sent: Wed Nov 22 2017 15:05:01 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Please allow ivory import from Zimbabwe

Director Sheehan,

November 21, 2017

Deputy Director Greg Sheehan: (b) (6) @fws.gov
Secretary Ryan Zinke: exsec@ios.doi.gov

TALKING POINTS IN SUPPORT OF ELEPHANT TROPHY IMPORTS FROM ZIMBABWE AND ZAMBIA

ELEPHANT TROPHY IMPORTS HAVE NEVER BEEN “BANNED,” AND THE POSITIVE ENHANCEMENT FINDINGS ARE BASED ON THE BEST AVAILABLE INFORMATION RECEIVED IN 2014-2016

- There has been no “ban” on elephant trophy imports. In April 2014, the U.S. Fish and Wildlife Service (FWS) “suspended” the import of elephant trophies from Zimbabwe due to a lack of information. Zimbabwe’s Parks and Wildlife Management Authority (ZPWMA) responded to two questionnaires from the FWS in April 2014 and December 2014. However, in March 2015, the FWS extended the suspension, finding information was still lacking. The negative enhancement finding dated March 2015 repeatedly affirmed, “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.” In July 2015, May 2016, and November 2016, ZPWMA responded to additional FWS questions. The November 2017 positive enhancement finding is based on these later responses and thousands of pages of supporting documents, including Zimbabwe’s National Elephant Management Action Plan, 2014 countrywide elephant population surveys, 2014-2016 actual and projected budget data, 2014 and 2015 offtakes and 2016 quota data, 2014-2016 CAMPFIRE data, and much more.
- Issuing import permits for elephant trophies from Zimbabwe was not a political decision by this Administration. In September 2016, before the election occurred, the FWS had already indicated to ZPWMA that the suspension would be lifted. ZPWMA was told by the Chief of Permits that the FWS needed “only one more piece of information,” a prioritization of the new Elephant Management Plan, before the negative enhancement finding could be reversed. That prioritization was provided on

November 8, 2016, before the election results were in. At the end of 2016, the FWS should have made the positive enhancement finding, but was admittedly sidetracked by an influx of thousands of new permit applications due to the listing of rosewood (used extensively in musical instruments and furniture) on the CITES Appendixes effective January 2017.

- Similarly, there has been no “ban” on the import of elephant trophies from Zambia. In October 2011, the FWS made a positive enhancement finding to authorize the import of regulated elephant hunting trophies from Zambia. However, 2013 and 2014, Zambia’s wildlife authority suspended hunting to obtain more current wildlife population information. In 2015, Zambia’s government lifted the hunting suspension, and set a conservative quota of 80 elephant. In August 2016, the Chief of Permits sent an email indicating that the FWS was trying to issue import permits for elephant trophies from Zambia before the CITES Conference of the Parties in September 2016, based on an April 2015 Non-Detriment and Enhancement Finding the FWS received from Zambia’s wildlife authority. However, the FWS ran out of time. At the Conference of the Parties, the Chief of Permits indicated that elephant permits from Zambia would likely issue before the end of the year. Again, because of the new rosewood permits, that enhancement finding was put on a back burner.

ZIMBABWE’S ELEPHANT POPULATION IS THE SECOND-LARGEST IN AFRICA

- In 1900, it was estimated that Zimbabwe had a national population of 4,000 elephant. Since then, the population has grown to over 82,000 (a twenty-fold increase). The current population is double the target national population established in the 1980s, almost 40% larger than in 1992, when the FWS determined to maintain the Endangered Species Act (ESA) “threatened” listing, and almost 20% larger than in 1997, when the last positive enhancement finding was made (before November 2017).

Elephant sub-populations in Zimbabwe are generally considered stable or increasing.

- North-West Matabeleland: This population is estimated at 54,000, and is most densely located in Hwange National Park (45,000 elephant). In 1928, the estimated elephant population in Hwange was 2,000.
- Sebungwe: This population is estimated at 3,500 and has declined since 2001 due to human population expansion into a previously unsettled area. The human population exploded from 45,000 in 1950 to over 700,000 in 2013, which explains the decline in the elephant population. Due to the expansion of human settlement and unlike other major elephant ranges in Zimbabwe, the habitat in this area is fragmented.
- Mid-Zambezi Valley: This area has an estimated elephant population of about 12,000. That population declined since the 2001 countrywide survey, and it is believed the decline is due to cross-border poaching and perhaps, the cross-border movement of elephants during the survey. Anti-poaching is a major component of the Zambezi Valley/Mana Pools Regional Elephant Management Action Plan, and recently the area has been chosen as a CITES MIKES site with an ongoing project.
- South-East Lowveld: Most of this population inhabits Gonarezhou National Park, whose population has been growing consistently at 5% per annum over 20 years. This region’s sub-population is estimated at 13,000 elephant between the Park, surrounding communal areas, and nearby private conservancies.

ZAMBIA'S ELEPHANT POPULATION IS STABLE

- Zambia's elephant population inhabits seven sub-regions covering National Parks and Game Management Areas. According to the 2016 African Elephant Status Report, Zambia's elephant population is estimated at over 21,000. This is generally considered stable over the past 25 years, and is stable compared to Zambia's population in 1992, when the FWS determined to maintain elephant as "threatened" listed. However, several population surveys indicating an estimate closer to 30,000 were not included in the 2016 African Elephant Status Report, and Zambia's wildlife authority estimates the country's population at more than 30,000.

ELEPHANT HUNTING OFFTAKES IN ZIMBABWE ARE SUSTAINABLE

- Zimbabwe maintains a CITES export quota of 1,000 tusks from 500 bull elephants. A national quota of 500 elephants represents only 0.6% of a population of 82,630 elephant. Actual hunting offtakes are considerably lower, have a negligible impact on the overall population rate, and have declined in the past three years due to the import suspension.

Average Hunting Offtakes 2010-2013 (% of Total Elephant Population): 228 (0.276%)

2013 Hunting Offtakes (% of Total Elephant Population): 258 (0.312%)

2014 Hunting Offtakes (% of Total Elephant Population): 162 (0.196%)

2015 Hunting Offtakes (% of Total Elephant Population): 075 (0.091%)

ELEPHANT HUNTING OFFTAKES IN ZAMBIA ARE NEGLIGIBLE

- In 2013 and 2014, Zambia suspended regulated tourist hunting to obtain a better sense of national wildlife population trends. In 2015, Zambia set a conservative export quota of 160 tusks from 80 bull elephants. Zambia maintained the quota of 80 elephants in 2016 and 2017. A national quota of 80 elephants represents less than 0.4% of a population of 21,967 elephant. Actual hunting offtakes are negligible and have no impact on the national population rate.

2015 Hunting Offtakes (% of Total Elephant Population): 03 (0.014%)

2016 Hunting Offtakes (% of Total Elephant Population): 12 (0.055%)

ELEPHANT MANAGEMENT IN ZIMBABWE IS GUIDED BY APPROPRIATE LEGISLATION AND A STATE-OF-THE-ART MANAGEMENT PLAN

- **Governing Law:** The Zimbabwe Parks and Wild Life Act provides the regulatory mechanism for ZPWMA and its programs. The Act created ZPWMA as a parastatal authority apart from the central government and established a separate fund, apart from the Central Treasury, to sustain ZPWMA's operations. The Act sets harsh penalties for elephant-related offenses, and was amended in 2010 to impose a nine-year minimum sentence for the first offense of elephant poaching. Under the Parks and Wild Life Act, Rural District Councils and other land holders are granted "appropriate authority" to benefit directly from wildlife. Under this legislation, land holders are encouraged to maintain and increase wildlife populations because they retain the benefits of sustainable use of that wildlife.

- **Elephant Management Plan:** Elephant are managed according to the Zimbabwe National Elephant Management Plan (2015-2020). The plan incorporates specific action items, deliverables, deadlines, and responsible parties. It is an adaptive management plan utilizing prioritization of targets measured by key components,

strategic objectives, and outputs. The plan focuses on five major components: Protection and Law Enforcement; Biological Monitoring and Management; Social, Economic, and Cultural Framework; Building Conservation Capacity; and Program Management. The National management plan is supplemented by four regional plans that utilize the same framework to address the unique challenges for each major elephant range in Zimbabwe. Zimbabwe's elephant management planning process was kicked off by the FWS' elephant trophy import suspension. ZPWMA held a year of stakeholder planning workshops, including a preparatory meeting of representatives from CAMPFIRE in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley range) in March-April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning workshop in the South East Lowveld range in September 2015.

ELEPHANT HUNTING IN ZIMBABWE GENERATES CONSERVATION BENEFITS THAT SATISFY THE “ENHANCEMENT” STANDARD: Although hunting offtakes are negligible, elephant hunting fees create extensive conservation incentives in Zimbabwe.

- **Habitat:** Hunting areas in Zimbabwe represent ~130,000km² of protected habitat. This represents over four times the size of Zimbabwe's National Parks (~28,000 km²). Healthy elephant populations require large tracts of habitat; the areas set aside for regulated hunting are therefore essential to the elephant's continued survival.
- **Management and Enforcement Revenues:** Revenues generated from tourist hunting conducted on state lands comprised approximately 20% of ZPWMA's revenue stream in 2014. Over \$6.2 million in trophy fees came from elephant hunts, with \$5 million accruing to ZPWMA to reinvest in elephant protection and species management. Over 50% of that revenue came from U.S. clients. Almost 80% of ZPWMA's operating budget is allocated towards law enforcement in the form of staff costs and patrol provisions. ZPWMA employs 1,500 active field rangers. Put simply, hunting revenues support anti-poaching efforts across Zimbabwe's elephant range—and this is largely paid for by American elephant hunters.
- **Operator Anti-Poaching:** In addition to supporting ZPWMA's enforcement capacity, hunting operators deploy their own anti-poaching units to police the Safari Areas and fund community game scouts in CAMPFIRE Areas. For example, a small sample of 14 individual operators surveyed by the Safari Operator Association of Zimbabwe spend \$957,843 on anti-poaching in 2013 and deployed 245 anti-poaching scouts. One specific operator, Charlton McCullum Safaris (CMS) in the Dande Safari Area and Mbire Communal Area, spends on average \$80,000-\$90,000 in patrol and equipment costs and anti-poaching rewards. From 2010 to 2016, CMS' efforts led to an 82% decline in elephant poaching in an import border region. As another example, the Save Valley and Buby Valley Conservancies together spend over \$1 million on anti-poaching each year. These anti-poaching efforts are funded predominately by hunting revenue, and protect stable populations of elephant and the third-largest black rhino population in the world.
- **Regional Anti-Poaching:** According to the CITES “Monitoring the Illegal Killing of Elephants” (MIKE) program, poaching in the Southern African countries that allow regulated tourist hunting, including Zimbabwe, is lower than anywhere else on the continent and has never reached an unsustainable level. This stands in stark contrast to the West and Central African countries that do not rely upon tourist hunting as a

conservation tool.

- **Community Benefits**: Zimbabwe's CAMPFIRE program is the pioneering community-based natural resource management program in Africa. The program allows rural communities to financially benefit from wildlife, thereby incentivizing the use of communal land as wildlife habitat, and the protection of wildlife in the form of increased tolerance of destructive wildlife. An estimated 77,000 households rely on CAMPFIRE benefit from CAMPFIRE. 90% of CAMPFIRE revenue is generated from regulated hunting, and 70% of this comes from elephant hunting. Thus, prior to the import suspension, elephant hunting generated over \$1.6 million per year for CAMPFIRE communities and was reinvested in the construction of classrooms and clinics, the installation of water infrastructure and solar powered facilities, the purchase of vehicles for anti-poaching support, compensation for destruction of crops or livestock by dangerous game, and other benefits that improve the livelihoods of the rural communities living in CAMPFIRE Areas. These benefits offset the damage caused by game species: from 2010 to 2015, elephant destroyed 7,495 hectares of crop fields in CAMPFIRE communities and claimed the lives of approximately 40 people.

ELEPHANT MANAGEMENT IN ZAMBIA IS UP-TO-DATE AND GENERATES SUBSTANTIAL BENEFITS TO ENCOURAGE RECOVERY OF THE SPECIES

- **Governing Law**: The **Zambian Wildlife Act No. 14 of 2015** is the guiding legislation for elephant protection and management. This cutting-edge law consolidated the prior wildlife authority into a government Department of National Parks and Wildlife (DNPW), to address the funding concerns and shortfalls experienced by the prior authority. DNPW is made up of a Wildlife Law Enforcement Unit with over 1,250 rangers; a Conservation Unit; an Infrastructure Development Unit; and a Community-Based Natural Resource Management Unit to oversee the development of conservation planning in Game Management Areas.
- **Management and Enforcement Revenues**: Between 2010 and 2012, regulated hunting revenues accounted for approximately 32% of the operating budget funding for Zambia's wildlife authority. With a potential to generate nearly \$1 million in elephant hunting fees, in 2015 and 2016, these fees totaled only \$150,000, due mainly to import restrictions. This amount was divided between DNPW and the Community Resource Boards in Game Management Areas (GMA). DNPW uses this revenue for range salaries and resource protection, as well as management surveys, staff training, and other activities. Approximately 75% of DNPW's expenditures are for anti-poaching, and Zambia's Wildlife Law Enforcement Unit conducted over 10,500 anti-poaching patrols in 2015, involving an average of 5,878 staff per quarter and 237,028 patrol days.
- **Habitat**: Hunting areas in Zambia (~180,000 km²) provide almost three times the amount of protected habitat compared to the country's National Parks (~64,000 km²).
- **Community Benefits**: In GMAs, elephant license fees are divided equally between the DNPW and the GMA's Community Resource Board, and 20% of concession fees also accrue to the Board. In 2015 and 2016, approximately \$1.36 million in hunting fees was distributed to the Boards, as well as \$10,000 per concession paid by the hunting operator. Under the new Wildlife Law, Boards must invest those funds as follows: 45% towards wildlife protection and patrols, 35% towards community improvement projects such as construction of schools, clinics, and water infrastructure, and 20% towards administrative costs. Written concession agreements between the operators, DNPW, and the community Boards usually obligate the concessionaire to make further

communities investments, such as constructing a classroom and paying a teacher's salary. Operators in 13 blocks were obligated to spend over \$1.1 million in community infrastructure development and 3.4 million in community lease and other payments for the duration of their leases.

- **Game Meat Distributions:** Moreover, under Zambian law, at least 50% of harvested game meat must be donated and distributed to local communities. A 2015 study found that operators in three GMAs contributed an average of 6,000 kilograms of harvested meat per season, and estimated that operators across all GMAs could provide ~130 tons of much-needed protein annually. This reduces the incentive for bush meat poaching in these areas bordering and buffering Zambia's National Parks.
- **Operator Anti-Poaching:** Hunting operators' concession agreements with DNPW and the Community Resource Board identify mandatory anti-poaching obligations and expenditures. At present, 75 Boards employ over 750 wildlife scouts and 79 support personnel, at a monthly cost of over \$38,800. Those scouts are paid for by revenues from tourist hunting. A small sample of four operators spent over \$201,000 on anti-poaching in 2015, to fund community scouts and fund and equip their own operator anti-poaching teams. This anti-poaching support is largely paid for by U.S. hunters, as over half of all hunting clients in Zambia are from the U.S.

[**Note:** Supporting documents for each of these points is available by contacting Conservation Force, cf@conservationforce.org. These Talking Points largely rely on the responses of ZPWMA and DNPW to FWS information requests and supporting documents provided as part of those responses as well as individual hunting operator enhancement reports, reports of the CAMPFIRE Association, and publicly available IUCN documents.]

10

MINI-ARGUMENTS REFUTING FALSE FACTS

- **There has never been a “ban” on elephant trophy imports from Zimbabwe.** A negative enhancement finding was made in April 2014 that “suspended” the import of elephant trophies. The FWS' negative 2015 enhancement finding stated repeatedly that once additional information was received, the negative finding would be reviewed and reversed (e.g., “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.”) A “ban” suggests a permanent prohibition; a “suspension” is a “temporary abrogation or withholding.” Zimbabwe's elephant trophy imports were suspended.
- **Lifting of the suspension was not a political decision.** The decision should have been made in July 2015, when ZPWMA provided extensive additional documentation in response to a FWS questionnaire. The FWS requested “one more piece of information” at the CITES Conference of the Parties in September 2016. That information was provided in November 2016. No further information was needed, or requested. If the FWS had properly prioritized the issuance of elephant import permits—as they told ZPWMA they would at the CITES Conference of the Parties—the positive

enhancement finding would have been made and these permits would have issued before the current Administration was in office.

• The import of elephant trophies from Zimbabwe should not have been suspended in the first place. In April 2014, the FWS announced the suspension based on an asserted “lack of information.” In contradiction to CITES Res. Conf. 6.7’s recommendation of notifying and consulting with range states before imposing stricter domestic measures, and the Endangered Species Act’s requirement of “encouraging foreign conservation programs,” 16 U.S.C. § 1537(b), the FWS shut down imports under an April 2014 negative enhancement finding that the FWS later admitted was wrong with respect to Zimbabwe’s elephant population and level of poaching. In fact, the correct estimate for Zimbabwe’s elephant population—almost 83,000—is 16,000 elephant higher than when the last, positive enhancement finding was made in 1997.

That estimate is double the size of the elephant populations of Namibia and South Africa put together, yet the FWS maintains positive enhancement findings for the import of elephant trophies from Namibia and South Africa. The trophy import suspension was based on a mistaken concern that Zimbabwe’s elephant population had declined, and the FWS should have admitted the mistake and reversed the suspension immediately. The failure to do so suggests a political motivation, not a scientific one.

• Zimbabwe’s elephant population is not “the worst managed,” but is among the best. That Zimbabwe maintains a stable elephant population of over 83,000, despite a despotic government, poor economy, and exploding human population growth rate, is a testament to the country’s strong management. That number is almost 40% higher than in 1992, when the FWS confirmed the “threatened” listing of elephant, and almost 20% higher than in 1997, when the FWS made a positive enhancement finding authorizing the import of elephant trophies. This is due in part to ZPWMA being a parastatal separate and separately funded from the central government. It is also due to the commitment of Zimbabwe’s citizens to maintaining their elephant, notwithstanding the costs—over 40 rural Zimbabweans were killed by elephant from 2010 to 2015. Zimbabwe’s strong wildlife management is also demonstrated by recent IUCN Red List assessments of lion and giraffe, which indicated increasing populations of these species in Zimbabwe. The evidence demonstrates that Zimbabwe’s wildlife management, not only its elephant management, is succeeding.]

• Zimbabwe’s elephant management is not “poor”; it is state-of-the-art and written by one of the world’s foremost elephant experts. In response to the April 2014 suspension of elephant trophy imports, ZPWMA took to heart the FWS’ criticism that Zimbabwe’s then-current elephant management plan dated to 1997. Although that plan was adaptively implemented and monitored, it was admittedly dated. Zimbabwe immediately began the process of adopting a brand-new, state-of-the-art elephant management plan—basically, to satisfy the FWS. This included a year of stakeholder planning workshops: a preparatory meeting of representatives from Zimbabwe’s community-based natural resources management program, CAMPFIRE, in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley) in early April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning workshop in the South East Lowveld region in September 2015. Zimbabwe focused on regional planning because the four regions face different management challenges. Each

planning workshop produced a regional elephant management plan that was incorporated into the final. The final document was drafted by a leading elephant scientist, and the process was monitored throughout by the IUCN's African Elephant Specialist Group.

- **Regulated hunting is not poaching.** By definition, "regulated" hunting is regulated and lawful. It is carefully monitored by ZPWMA, and offtakes are recorded in a national database. Lawfully hunted ivory tusks are marked to show that they are lawful and note the year of harvest. Moreover, regulated hunting revenues underwrite most anti-poaching expenses in Zimbabwe and the rest of Southern Africa, either by fees paid to government wildlife authorities that are used for law enforcement, or by operator-funded teams that patrol concessions and keep poachers out. Finally, revenue-sharing and contributions by hunting operators creates conservation incentives for rural communities most affected by wildlife, which disincentivizes poaching. For example, Zimbabwe's CAMPFIRE communities were receiving over \$1.6 million per year in revenues from elephant hunting prior to the import suspension. These funds allow for clinics and schools to be built, teachers' salaries to be paid, boreholes to be drilled, and so on. Hunting operators in Zambia are required to share at least 50% of harvested meat with rural communities. Many tons of meat can come from elephant hunts, to reduce the need and tolerance for bushmeat poaching and protect species in addition to elephant.

- **Allowing imports of elephant trophies will not damage the government's efforts to control ivory trafficking.** Elephant trophy imports have been authorized for Namibia and South Africa for the past three years, which demonstrates that a country may maintain lawful hunting and low poaching at the same time. In fact, according to the CITES MIKE data, the Southern African countries that depend upon regulated hunting as a conservation tool have the lowest Proportion of Illegally Killed Elephant (PIKE) rates in the world. PIKE, which is used to assess whether poaching levels are unsustainable, has never risen above the sustainability threshold in Southern Africa. PIKE at Zimbabwe's MIKE sites is well below that level. Moreover, national and international law requires the marking of ivory tusks taken as lawful hunting trophies, which clearly and visibly separates these lawful tusks from illegal ones.

- **Photographic tourism is not a substitute in most hunting areas.** Opponents argue that photographic tourism would be a better option than hunting. It is true that photo-tourism is available in some places; for example, some conservancies in Namibia benefit from photographic tourism revenues alone or a mixture of photo- and hunting tourism. But photo-tourism requires decent infrastructure and scenery, and dense enough wildlife populations to draw tourists. These may not be available in remote areas of a country without access to airports or other activities, and where the wildlife populations are not yet dense enough to ensure a sighting on a two-hour game drive. This is the situation in many CAMPFIRE Areas, where photographic tourism was tried ... and failed. In these areas, without the benefits of hunting, the habitat would be converted to agriculture and livestock. Benefits to the rural community stakeholders are less from photographic tourism than from tourist hunting.

10

Thank you,

Kadi Noble

Sent from my iPhone

Conversation Contents

Elephant and Lion Importation into the USA

Keith Atcheson <keith@atcheson.com>

From: Keith Atcheson <keith@atcheson.com>
Sent: Wed Nov 22 2017 13:54:20 GMT-0700 (MST)
To: "(b) (6)" <[REDACTED]@fws.gov"> <[REDACTED]@fws.gov">
Subject: Elephant and Lion Importation into the USA

Dear Mr. Sheehan,

I'm writing to ask for your support in allowing elephant and lion trophy importation from Zimbabwe and Zambia for American hunters.

Our business has sent thousands of hunters to African countries for over 50 years and I've personally completed over 50 safaris myself. I believe we are very qualified and truly understand the African model of hunting, conservation, preservation and how it works. African countries do not enjoy the North American Conservation model that are funded nicely by hunters and fisherman buying licensing and sporting equipment under programs like the PR Act and others.

Africa is quite the opposite. There is no middle class. Most residents cannot own firearms or buy licenses to go hunting because the possibility does not even exist. Most areas that support healthy elephant and cat populations are heavily financially supported by worldwide hunters that pay large daily rates and trophy fees to local governments, communities, outfitters, guides, professional hunters etc... American hunters are a majority of this funding. These funds support local conservation and anti-poaching programs that actually teach people not to poach and give a value to game animals that live in areas where they co-exist with humans. It raises money for trained game guards and small game departments. Funds are also allocated to help with rural schools, hospitals and community health clinics.

If hunters are not allowed to import Lion and Elephant back into the USA it will stop many hunters from going in the first place and its extremely damaging to the very species we are all trying to protect. The anti-hunting community contributes 0 dollars into conservation and preservation of many worldwide species.

Please encourage Director Zinke and President Trump to consider the greater good for the species we all love and continue importation of well managed species like Elephant and Lion. If our government listens only to the social media hysteria line of the uninformed and ignorant anti-hunting movement it will result in far greater damage to elephant and lion populations and many other species that co-exist symbiotically.

Thank you for your consideration.

Best Regards,

Keith Atcheson
Jack Atcheson & Sons Inc.
Worldwide Hunting Consultant
MT. Outfitter Since 1983 Lic. #180
NRA Life Member
3210 Ottawa Street
Butte, MT. 59701
406-782-2382
www.atcheson.com

Conversation Contents

Hunted Elephant Importation - Letter from The Wildlife Society

Attachments:

/64. Hunted Elephant Importation - Letter from The Wildlife Society/1.1
TWS_ElephantImportLetter_FINAL_2017.11.22.pdf
/64. Hunted Elephant Importation - Letter from The Wildlife Society/2.1
TWS_ElephantImportLetter_FINAL_2017.11.22.pdf

Keith Norris <knorris@wildlife.org>

From: Keith Norris <knorris@wildlife.org>
Sent: Wed Nov 22 2017 08:29:40 GMT-0700 (MST)
To: undisclosed-recipients;;
Subject: Hunted Elephant Importation - Letter from The Wildlife Society
Attachments: TWS_ElephantImportLetter_FINAL_2017.11.22.pdf

Please see the attached letter from The Wildlife Society regarding the importation of elephant trophies from Zimbabwe, Zambia, and other African countries. The letter supports science-based policies that promote sustainable use of wildlife, and recognizes that hunting can enhance wildlife conservation efforts.

Best,

Keith

Keith Norris, AWB®
Director, Wildlife Policy & Programs
The Wildlife Society

425 Barlow Place, Suite 200
Bethesda, MD 20814
301.897.9770 x309
301.530.2471 (fax)
www.wildlife.org
keith.norris@wildlife.org

"Bell, Gloria" <gloria_bell@fws.gov>

From: "Bell, Gloria" <gloria_bell@fws.gov>
Sent: Wed Nov 22 2017 08:33:22 GMT-0700 (MST)
Greg Sheehan <(b) (6)@fws.gov>, Matthew Huggler
<matthew_huggler@fws.gov>, Craig Hoover
To: <craig_hoover@fws.gov>, "Vannorman, Tim"

<tim_vannorman@fws.gov>

Subject:

Fwd: Hunted Elephant Importation - Letter from The Wildlife Society

Attachments:

TWS_ElephantImportLetter_FINAL_2017.11.22.pdf

FYI

Gloria Bell | Acting Assistant Director for International Affairs | U.S. Fish & Wildlife Service
5275 Leesburg Pike, MS: IA, Falls Church, Virginia, 22041-3803, USA | 703-358-1767
www.fws.gov/international | [Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!



Learn more about [Diversity Change Agents](#).

----- Forwarded message -----

From: **Keith Norris** <knorris@wildlife.org>

Date: Wed, Nov 22, 2017 at 10:29 AM

Subject: Hunted Elephant Importation - Letter from The Wildlife Society

To:

Please see the attached letter from The Wildlife Society regarding the importation of elephant trophies from Zimbabwe, Zambia, and other African countries. The letter supports science-based policies that promote sustainable use of wildlife, and recognizes that hunting can enhance wildlife conservation efforts.

Best,

Keith

Keith Norris, AWB®

Director, Wildlife Policy & Programs

The Wildlife Society

425 Barlow Place, Suite 200

Bethesda, MD 20814

301.897.9770 x309

301.530.2471 (fax)

www.wildlife.org

keith.norris@wildlife.org

Conversation Contents

Elephant Trophy Imports from Zimbabwe.

Attachments:

/67. Elephant Trophy Imports from Zimbabwe./1.1 DAPU 2017pdf.pdf

CMS <admin1@cmsafaris.com>

From: CMS <admin1@cmsafaris.com>
Sent: Tue Nov 21 2017 23:40:51 GMT-0700 (MST)
To: "exsec@ios.doi.gov" <exsec@ios.doi.gov>
CC: "(b) (6)" @fws.gov" <(b) (6)" @fws.gov>
Subject: Elephant Trophy Imports from Zimbabwe.
Attachments: DAPU 2017pdf.pdf

Conversation Contents

Support for USFW on Elephant Imports

Attachments:

/68. Support for USFW on Elephant Imports/1.1 Letter to Mr. Sheehan.docx

<lr@stopallpoaching.org>

From: <lr@stopallpoaching.org>
Sent: Tue Nov 21 2017 18:39:30 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Support for USFW on Elephant Imports
Attachments: Letter to Mr. Sheehan.docx

Mr. Sheehan,

Please find attached my letter representing International Wildlife Crimestoppers support for the efforts of USFW concerning the latest determination on Elephant imports from Zimbabwe and Zambia.

Sincerely,

Lewis Rather

Executive Director
International Wildlife Crimestoppers
PO Box 2925
Fredericksburg, Texas 78624
(830)998-8725
www.wildlifecrimestoppers.org

Conversation Contents

Zambia and Zimbabwe Trophies

Eric Rau <eer@edsdrilling.com>

From: Eric Rau <eer@edsdrilling.com>
Sent: Tue Nov 21 2017 15:04:19 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Zambia and Zimbabwe Trophies

Mr. Sheehan,

I write to urge you to renew...allow...and permit the import of elephant and lion trophies from Zimbabwe and Zambia.

I won't bore you with repeating talking points except to say that the evidence is clear that hunting provides real value to the animal populations...and an income to the countries that can't be replaced by tourism, photography safaris and the like.

Without hunting, anti-poaching will dwindle to an ineffective close as the animals disappear.

Without hunting, the animals in Zambia and Zimbabwe will disappear despite the professional management of the herds as documented for USFWS.

I urge your support and actions to allow import of these trophies and close by thanking you for your consideration.

Eric E. Rau
3583 Massey Ford Rd.
Union, MO 63084
636.239.4748 ext #2, work.

Conversation Contents

Zimbabwe Elephant Imports

Jeff Nicholas <jeffnicholas@gmail.com>

From: Jeff Nicholas <jeffnicholas@gmail.com>
Sent: Tue Nov 21 2017 14:20:58 GMT-0700 (MST)
To: <exsec@ios.doi.gov>, <(b) (6)@fws.gov>
CC: Jeff Nicholas <jeffnicholas@gmail.com>
Subject: Zimbabwe Elephant Imports

Dear Secretary Zinke and Director Sheehan, I want to thank you both and the FWS for its positive enhancement finding regarding Elephant and Lion in Southern Africa, and specifically Zimbabwe. I have been to Zimbabwe three times over the past four years and can personally attest to the positive conservation impact that sport hunting provides to African wildlife. I have hunted in Metebeleland South Province and helped conservation efforts by personally spending over \$100,000 over the course of three hunts, including leopard and elephant hunts. The money sportsmen spend directly benefits the local population and the wildlife. Let me please give you a specific example of elephant conservation due directly to sport hunting support. Debshan Ranch, in Metebeleland South Province comprises of 125,000 acres of privately held land. It is a working cattle ranch, but also intensively managed for wildlife. Sean Grant owns and operates Shangani River Safaris on Debshan. When he was awarded the hunting consession, he invested a great amount of money and time into an anti poaching system. He has three anti poaching units which patrol full time removing snares and engaging poachers. When Sean started he was losing over 30 elephant a year to poachers. Through his efforts, and ENTIRELY SUPPORTED BY SPORTING DOLLARS, he now averages only two to three poached elephants each year. He legally takes about 10 elephant bulls per year and only hunts old, no longer breeding bulls. The facts are that left to defend themselves, without sportsmen, the elephant will not survive. It is obvious to me from actual experience that the denial of import permits will have a severe negative impact on the very animals FWS is supposedly trying to protect. Please rely on science and actual statistics, not on emotions and "politically expedient" yet short sighted decision making and support the recent enhancement finding. African wildlife depends on our support and the value we give it Respectfully, Jeff Nicholas 501.379.8404
jeffnicholas@gmail.com Sent from my iPhone

Conversation Contents

Elephant/lion imports fro Zimbabwe

Tony Rogers <TonyRogersSDG@aol.com>

From: Tony Rogers <TonyRogersSDG@aol.com>
Sent: Tue Nov 21 2017 13:43:17 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Elephant/lion imports fro Zimbabwe

Please support the import of elephant trophy. The dollars we spent and the value those dollars give them help to protect the species from poaching and eradication from the locals. Sincerely
Tony Rogers Sent from my iPhone

Conversation Contents

Elephant and Lion Imports from Zambia and Zimbabwe

Mary Ann Justus <john.justus@icloud.com>

From: Mary Ann Justus <john.justus@icloud.com>
Sent: Tue Nov 21 2017 13:10:35 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Elephant and Lion Imports from Zambia and Zimbabwe

Dear Deputy Director Sheehan, My name is John Justus. I am an avid hunter, but more importantly a conservationist. While people may call me a “murderer” or worse, they cannot deny the value that sustainable hunting brings to the long term health and growth of wildlife populations. Unfortunately, recent decisions to close hunting in various locations throughout the world has not been based on science but rather political pressures from anti-hunting groups who do not understand why we hunt or spend the time to understand the role sustainable hunting plays in wildlife conservation. We are now faced with a threat by President Trump to overturn recent rulings by the US Fish and Wildlife Service and ban the import of Elephant and Lions legally taken in Zambia and Zimbabwe. Our hope, as hunters, is that he takes the time to understand the benefits that hunting plays in enhancing the populations of these species. We are confident that if President Trump bases his decision on facts, rather than political pressures, the continued import of these species taken legally will be allowed. A ruling to ban these imports will in effect stop the sustainable hunting and therefore the resulting conservation benefits that hunting provides. Without the revenues flowing back to the communities from hunting, wildlife has no value. The result will be a major decline, if not the elimination of these important species in Zambia, Zimbabwe as well as other African countries. Sincerely, John R. Justus

Conversation Contents

Support of Elephant Trophy Imports from Zimbabwe and Zambia

Attachments:

177. Support of Elephant Trophy Imports from Zimbabwe and Zambia/1.1 image001.jpg

Anthony Turiello <anthony@rescueair.com>

From: Anthony Turiello <anthony@rescueair.com>
Sent: Tue Nov 21 2017 11:45:10 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Support of Elephant Trophy Imports from Zimbabwe and Zambia
Attachments: image001.jpg

Dear Deputy Director Greg Sheehan

ELEPHANT TROPHY IMPORTS HAVE NEVER BEEN “BANNED,” AND THE POSITIVE ENHANCEMENT FINDINGS ARE BASED ON THE BEST AVAILABLE INFORMATION RECEIVED IN 2014-2016

- There has been no “ban” on elephant trophy imports. In April 2014, the U.S. Fish and Wildlife Service (FWS) “suspended” the import of elephant trophies from Zimbabwe due to a lack of information. Zimbabwe’s Parks and Wildlife Management Authority (ZPWMA) responded to two questionnaires from the FWS in April 2014 and December 2014. However, in March 2015, the FWS extended the suspension, finding information was still lacking. The negative enhancement finding dated March 2015 repeatedly affirmed, “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.” In July 2015, May 2016, and November 2016, ZPWMA responded to additional FWS questions. The November 2017 positive enhancement finding is based on these later responses and thousands of pages of supporting documents, including Zimbabwe’s National Elephant Management Action Plan, 2014 countrywide elephant population surveys, 2014-2016 actual and projected budget data, 2014 and 2015 oftakes and 2016 quota data, 2014-2016 CAMPFIRE data, and much more.
- Issuing import permits for elephant trophies from Zimbabwe was not a political decision by this Administration. In September 2016, before the election occurred, the FWS had already indicated to ZPWMA that the suspension would be lifted. ZPWMA was told by the Chief of Permits that the FWS needed “only one more piece of information,” a prioritization of the new Elephant Management Plan, before the negative enhancement finding could be reversed. That prioritization was provided on November 8, 2016, before the election results were in. At the end of 2016, the FWS should have made the positive enhancement finding, but was admittedly sidetracked by an influx of thousands of new permit applications due to the listing of rosewood (used extensively in musical instruments and furniture) on the CITES Appendixes effective January 2017.
- Similarly, there has been no “ban” on the import of elephant trophies from Zambia. In October 2011, the FWS made a positive enhancement finding to authorize the import of regulated elephant hunting trophies from Zambia. However, 2013 and 2014, Zambia’s wildlife authority suspended hunting to obtain more current wildlife population information. In 2015, Zambia’s government lifted the hunting suspension, and set a conservative quota of 80 elephant. In August 2016, the Chief of Permits sent an email indicating that the FWS was trying to issue import permits for elephant trophies from Zambia before the CITES Conference of the Parties in September 2016, based on an April 2015 Non-Detriment and Enhancement Finding the FWS received from Zambia’s wildlife authority. However, the FWS ran out of time. At the Conference of the Parties, the Chief of Permits indicated that

elephant permits from Zambia would likely issue before the end of the year. Again, because of the new rosewood permits, that enhancement finding was put on a back burner.

ZIMBABWE'S ELEPHANT POPULATION IS THE SECOND-LARGEST IN AFRICA

- In 1900, it was estimated that Zimbabwe had a national population of 4,000 elephant. Since then, the population has grown to over 82,000 (a twenty-fold increase). The current population is double the target national population established in the 1980s, almost 40% larger than in 1992, when the FWS determined to maintain the Endangered Species Act (ESA) “threatened” listing, and almost 20% larger than in 1997, when the last positive enhancement finding was made (before November 2017). Elephant sub-populations in Zimbabwe are generally considered stable or increasing.
 - North-West Matabeleland: This population is estimated at 54,000, and is most densely located in Hwange National Park (45,000 elephant). In 1928, the estimated elephant population in Hwange was 2,000.
 - Sebungwe: This population is estimated at 3,500 and has declined since 2001 due to human population expansion into a previously unsettled area. The human population exploded from 45,000 in 1950 to over 700,000 in 2013, which explains the decline in the elephant population. Due to the expansion of human settlement and unlike other major elephant ranges in Zimbabwe, the habitat in this area is fragmented.
 - Mid-Zambezi Valley: This area has an estimated elephant population of about 12,000. That population declined since the 2001 countrywide survey, and it is believed the decline is due to cross-border poaching and perhaps, the cross-border movement of elephants during the survey. Anti-poaching is a major component of the Zambezi Valley/Mana Pools Regional Elephant Management Action Plan, and recently the area has been chosen as a CITES MIKES site with an ongoing project.
 - South-East Lowveld: Most of this population inhabits Gonarezhou National Park, whose population has been growing consistently at 5% per annum over 20 years. This region's sub-population is estimated at 13,000 elephant between the Park, surrounding communal areas, and nearby private conservancies.

ZAMBIA'S ELEPHANT POPULATION IS STABLE

- Zambia's elephant population inhabits seven sub-regions covering National Parks and Game Management Areas. According to the 2016 African Elephant Status Report, Zambia's elephant population is estimated at over 21,000. This is generally considered stable over the past 25 years, and is stable compared to Zambia's population in 1992, when the FWS determined to maintain elephant as “threatened” listed. However, several population surveys indicating an estimate closer to 30,000 were not included in the 2016 African Elephant Status Report, and Zambia's wildlife authority estimates the country's population at more than 30,000.

ELEPHANT HUNTING OFFTAKES IN ZIMBABWE ARE SUSTAINABLE

- Zimbabwe maintains a CITES export quota of 1,000 tusks from 500 bull elephants. A national quota of 500 elephants represents only 0.6% of a population of 82,630 elephant. Actual hunting offtakes are considerably lower, have a negligible impact on the overall population rate, and have declined in the past three years due to the import suspension.
 - Average Hunting Offtakes 2010-2013 (% of Total Elephant Population): 228 (0.276%)
 - 2013 Hunting Offtakes (% of Total Elephant Population): 258 (0.312%)
 - 2014 Hunting Offtakes (% of Total Elephant Population): 162 (0.196%)
 - 2015 Hunting Offtakes (% of Total Elephant Population): 075 (0.091%)

ELEPHANT HUNTING OFFTAKES IN ZAMBIA ARE NEGLIGIBLE

- In 2013 and 2014, Zambia suspended regulated tourist hunting to obtain a better sense of national wildlife population trends. In 2015, Zambia set a conservative export quota of 160 tusks from 80 bull elephants. Zambia maintained the quota of 80 elephants in 2016 and 2017. A national quota of 80 elephants represents less than 0.4% of a population of 21,967 elephant. Actual hunting offtakes are negligible and have no impact on the national population rate.
 - 2015 Hunting Offtakes (% of Total Elephant Population): 03 (0.014%)
 - 2016 Hunting Offtakes (% of Total Elephant Population): 12 (0.055%)

ELEPHANT MANAGEMENT IN ZIMBABWE IS GUIDED BY APPROPRIATE LEGISLATION AND A STATE-OF-THE-ART MANAGEMENT PLAN

- **Governing Law:** The Zimbabwe Parks and Wild Life Act provides the regulatory mechanism for ZPWMA and its programs. The Act created ZPWMA as a parastatal authority apart from the central government and established a separate fund, apart from the Central Treasury, to sustain ZPWMA's operations. The Act sets harsh penalties for elephant-related offenses, and was amended in 2010 to impose a nine-year minimum sentence for the first offense of elephant poaching. Under the Parks and Wild Life Act, Rural District Councils and other land holders are granted "appropriate authority" to benefit directly from wildlife. Under this legislation, land holders are encouraged to maintain and increase wildlife populations because they retain the benefits of sustainable use of that wildlife.
- **Elephant Management Plan:** Elephant are managed according to the Zimbabwe National Elephant Management Plan (2015-2020). The plan incorporates specific action items, deliverables, deadlines, and responsible parties. It is an adaptive management plan utilizing prioritization of targets measured by key components, strategic objectives, and outputs. The plan focuses on five major components: Protection and Law Enforcement; Biological Monitoring and Management; Social, Economic, and Cultural Framework; Building Conservation Capacity; and Program Management. The National management plan is supplemented by four regional plans that utilize the same framework to address the unique challenges for each major elephant range in Zimbabwe. Zimbabwe's elephant management planning process was kicked off by the FWS' elephant trophy import suspension. ZPWMA held a year of stakeholder planning workshops, including a preparatory meeting of representatives from CAMPFIRE in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley range) in March-April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning workshop in the South East Lowveld range in September 2015.

ELEPHANT HUNTING IN ZIMBABWE GENERATES CONSERVATION BENEFITS THAT SATISFY THE "ENHANCEMENT" STANDARD: Although hunting offtakes are negligible, elephant hunting fees create extensive conservation incentives in Zimbabwe.

- **Habitat:** Hunting areas in Zimbabwe represent ~130,000 km² of protected habitat. This represents over four times the size of Zimbabwe's National Parks (~28,000 km²). Healthy elephant populations require large tracts of habitat; the areas set aside for regulated hunting are therefore essential to the elephant's continued survival.
- **Management and Enforcement Revenues:** Revenues generated from tourist hunting conducted on state lands comprised approximately 20% of ZPWMA's revenue stream in 2014. Over \$6.2 million in trophy fees came from elephant hunts, with \$5 million accruing to ZPWMA to reinvest in elephant protection and species management. Over 50% of that revenue came from U.S. clients. Almost 80% of ZPWMA's operating budget is allocated towards law enforcement in the form of staff costs and patrol provisions. ZPWMA employs 1,500 active field rangers. Put simply, hunting revenues support anti-poaching efforts across Zimbabwe's elephant range—and this is largely paid for by American elephant hunters.
- **Operator Anti-Poaching:** In addition to supporting ZPWMA's enforcement capacity, hunting operators deploy their own anti-poaching units to police the Safari Areas and fund community game scouts in CAMPFIRE Areas. For example, a small sample of 14 individual operators surveyed by the Safari Operator Association of Zimbabwe spend \$957,843 on anti-poaching in 2013 and deployed 245 anti-poaching scouts. One specific operator, Charlton McCullum Safaris (CMS) in the Dande Safari Area and Mbire Communal Area, spends on average \$80,000-\$90,000 in patrol and equipment costs and anti-poaching rewards. From 2010 to 2016, CMS' efforts led to an 82% decline in elephant poaching in an import border region. As another example, the Save Valley and Buby Valley Conservancies together spend over \$1 million on anti-poaching each year. These anti-poaching efforts are funded predominately by hunting revenue, and protect stable populations of elephant and the third-largest black rhino population in the world.
- **Regional Anti-Poaching:** According to the CITES "Monitoring the Illegal Killing of Elephants" (MIKE) program, poaching in the Southern African countries that allow regulated tourist hunting, including Zimbabwe, is lower than anywhere else on the continent and has never reached an unsustainable level. This stands in stark contrast to the West and Central African countries that do not rely upon tourist hunting as a conservation tool.
- **Community Benefits:** Zimbabwe's CAMPFIRE program is the pioneering community-based natural resource management program in Africa. The program allows rural communities to financially benefit from wildlife, thereby incentivizing the use of communal land as wildlife habitat, and the protection of wildlife in the form of increased tolerance of destructive wildlife. An estimated 77,000 households rely on CAMPFIRE benefit from CAMPFIRE. 90% of CAMPFIRE revenue is generated from regulated hunting, and 70% of this comes from elephant hunting. Thus, prior to the import suspension, elephant hunting generated over \$1.6 million per year for CAMPFIRE communities and

was reinvested in the construction of classrooms and clinics, the installation of water infrastructure and solar powered facilities, the purchase of vehicles for anti-poaching support, compensation for destruction of crops or livestock by dangerous game, and other benefits that improve the livelihoods of the rural communities living in CAMPFIRE Areas. These benefits offset the damage caused by game species: from 2010 to 2015, elephant destroyed 7,495 hectares of crop fields in CAMPFIRE communities and claimed the lives of approximately 40 people.

ELEPHANT MANAGEMENT IN ZAMBIA IS UP-TO-DATE AND GENERATES SUBSTANTIAL BENEFITS TO ENCOURAGE RECOVERY OF THE SPECIES

- **Governing Law:** The Zambian Wildlife Act No. 14 of 2015 is the guiding legislation for elephant protection and management. This cutting-edge law consolidated the prior wildlife authority into a government Department of National Parks and Wildlife (DNPW), to address the funding concerns and shortfalls experienced by the prior authority. DNPW is made up of a Wildlife Law Enforcement Unit with over 1,250 rangers; a Conservation Unit; an Infrastructure Development Unit; and a Community-Based Natural Resource Management Unit to oversee the development of conservation planning in Game Management Areas.
- **Management and Enforcement Revenues:** Between 2010 and 2012, regulated hunting revenues accounted for approximately 32% of the operating budget funding for Zambia's wildlife authority. With a potential to generate nearly \$1 million in elephant hunting fees, in 2015 and 2016, these fees totaled only \$150,000, due mainly to import restrictions. This amount was divided between DNPW and the Community Resource Boards in Game Management Areas (GMA). DNPW uses this revenue for range salaries and resource protection, as well as management surveys, staff training, and other activities. Approximately 75% of DNPW's expenditures are for anti-poaching, and Zambia's Wildlife Law Enforcement Unit conducted over 10,500 anti-poaching patrols in 2015, involving an average of 5,878 staff per quarter and 237,028 patrol days.
- **Habitat:** Hunting areas in Zambia (~180,000 km²) provide almost three times the amount of protected habitat compared to the country's National Parks (~64,000 km²).
- **Community Benefits:** In GMAs, elephant license fees are divided equally between the DNPW and the GMA's Community Resource Board, and 20% of concession fees also accrue to the Board. In 2015 and 2016, approximately \$1.36 million in hunting fees was distributed to the Boards, as well as \$10,000 per concession paid by the hunting operator. Under the new Wildlife Law, Boards must invest those funds as follows: 45% towards wildlife protection and patrols, 35% towards community improvement projects such as construction of schools, clinics, and water infrastructure, and 20% towards administrative costs. Written concession agreements between the operators, DNPW, and the community Boards usually obligate the concessionaire to make further communities investments, such as constructing a classroom and paying a teacher's salary. Operators in 13 blocks were obligated to spend over \$1.1 million in community infrastructure development and 3.4 million in community lease and other payments for the duration of their leases.
- **Game Meat Distributions:** Moreover, under Zambian law, at least 50% of harvested game meat must be donated and distributed to local communities. A 2015 study found that operators in three GMAs contributed an average of 6,000 kilograms of harvested meat per season, and estimated that operators across all GMAs could provide ~130 tons of much-needed protein annually. This reduces the incentive for bush meat poaching in these areas bordering and buffering Zambia's National Parks.
- **Operator Anti-Poaching:** Hunting operators' concession agreements with DNPW and the Community Resource Board identify mandatory anti-poaching obligations and expenditures. At present, 75 Boards employ over 750 wildlife scouts and 79 support personnel, at a monthly cost of over \$38,800. Those scouts are paid for by revenues from tourist hunting. A small sample of four operators spent over \$201,000 on anti-poaching in 2015, to fund community scouts and fund and equip their own operator anti-poaching teams. This anti-poaching support is largely paid for by U.S. hunters, as over half of all hunting clients in Zambia are from the U.S.

[Note: Supporting documents for each of these points is available by contacting Conservation Force, cf@conservationforce.org. These Talking Points largely rely on the responses of ZPWMA and DNPW to FWS information requests and supporting documents provided as part of those responses as well as individual hunting operator enhancement reports, reports of the CAMPFIRE Association, and publicly available IUCN documents.]

- There has never been a “ban” on elephant trophy imports from Zimbabwe. A negative enhancement finding was made in April 2014 that “suspended” the import of elephant trophies. The FWS’ negative 2015 enhancement finding stated repeatedly that once additional information was received, the negative finding would be reviewed and reversed (e.g., “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.”) A “ban” suggests a permanent prohibition; a “suspension” is a “temporary abrogation or withholding.” Zimbabwe’s elephant trophy imports were suspended.
- Lifting of the suspension was not a political decision. The decision should have been made in July 2015, when ZPWMA provided extensive additional documentation in response to a FWS questionnaire. The FWS requested “one more piece of information” at the CITES Conference of the Parties in September 2016. That information was provided in November 2016. No further information was needed, or requested. If the FWS had properly prioritized the issuance of elephant import permits—as they told ZPWMA they would at the CITES Conference of the Parties—the positive enhancement finding would have been made and these permits would have issued before the current Administration was in office.
- The import of elephant trophies from Zimbabwe should not have been suspended in the first place. In April 2014, the FWS announced the suspension based on an asserted “lack of information.” In contradiction to CITES Res. Conf. 6.7’s recommendation of notifying and consulting with range states before imposing stricter domestic measures, and the Endangered Species Act’s requirement of “encouraging foreign conservation programs,” 16 U.S.C. § 1537(b), the FWS shut down imports under an April 2014 negative enhancement finding that the FWS later admitted was wrong with respect to Zimbabwe’s elephant population and level of poaching. In fact, the correct estimate for Zimbabwe’s elephant population—almost 83,000—is 16,000 elephant higher than when the last, positive enhancement finding was made in 1997. That estimate is double the size of the elephant populations of Namibia and South Africa put together, yet the FWS maintains positive enhancement findings for the import of elephant trophies from Namibia and South Africa. The trophy import suspension was based on a mistaken concern that Zimbabwe’s elephant population had declined, and the FWS should have admitted the mistake and reversed the suspension immediately. The failure to do so suggests a political motivation, not a scientific one.
- Zimbabwe’s elephant population is not “the worst managed,” but is among the best. That Zimbabwe maintains a stable elephant population of over 83,000, despite a despotic government, poor economy, and exploding human population growth rate, is a testament to the country’s strong management. That number is almost 40% higher than in 1992, when the FWS confirmed the “threatened” listing of elephant, and almost 20% higher than in 1997, when the FWS made a positive enhancement finding authorizing the import of elephant trophies. This is due in part to ZPWMA being a parastatal separate and separately funded from the central government. It is also due to the commitment of Zimbabwe’s citizens to maintaining their elephant, notwithstanding the costs—over 40 rural Zimbabweans were killed by elephant from 2010 to 2015. Zimbabwe’s strong wildlife management is also demonstrated by recent IUCN Red List assessments of lion and giraffe, which indicated increasing populations of these species in Zimbabwe. The evidence demonstrates that Zimbabwe’s wildlife management, not only its elephant management, is succeeding.]
- Zimbabwe’s elephant management is not “poor”; it is state-of-the-art and written by one of the world’s foremost elephant experts. In response to the April 2014 suspension of elephant trophy imports, ZPWMA took to heart the FWS’ criticism that Zimbabwe’s then-current elephant management plan dated to 1997. Although that plan was adaptively implemented and monitored, it was admittedly dated. Zimbabwe immediately began the process of adopting a brand-new, state-of-the-art elephant management plan—basically, to satisfy the FWS. This included a year of stakeholder planning workshops: a preparatory meeting of representatives from Zimbabwe’s community-based natural resources management program, CAMPFIRE, in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley) in early April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning workshop in the South East Lowveld region in September 2015. Zimbabwe focused on regional planning because the four regions face different management challenges. Each planning workshop produced a regional elephant management plan that was incorporated into the final. The final document was drafted by a leading elephant scientist, and the process was monitored throughout by the IUCN’s African Elephant Specialist Group.
- Regulated hunting is not poaching. By definition, “regulated” hunting is regulated and lawful. It is carefully monitored by ZPWMA, and offtakes are recorded in a national database. Lawfully hunted ivory tusks are marked to show that they are lawful and note the year of harvest. Moreover, regulated hunting revenues underwrite most anti-poaching expenses in Zimbabwe and the rest of Southern

Africa, either by fees paid to government wildlife authorities that are used for law enforcement, or by operator-funded teams that patrol concessions and keep poachers out. Finally, revenue-sharing and contributions by hunting operators creates conservation incentives for rural communities most affected by wildlife, which disincentivizes poaching. For example, Zimbabwe's CAMPFIRE communities were receiving over \$1.6 million per year in revenues from elephant hunting prior to the import suspension. These funds allow for clinics and schools to be built, teachers' salaries to be paid, boreholes to be drilled, and so on. Hunting operators in Zambia are required to share at least 50% of harvested meat with rural communities. Many tons of meat can come from elephant hunts, to reduce the need and tolerance for bushmeat poaching and protect species in addition to elephant.

- Allowing imports of elephant trophies will not damage the government's efforts to control ivory trafficking. Elephant trophy imports have been authorized for Namibia and South Africa for the past three years, which demonstrates that a country may maintain lawful hunting and low poaching at the same time. In fact, according to the CITES MIKE data, the Southern African countries that depend upon regulated hunting as a conservation tool have the lowest Proportion of Illegally Killed Elephant (PIKE) rates in the world. PIKE, which is used to assess whether poaching levels are unsustainable, has never risen above the sustainability threshold in Southern Africa. PIKE at Zimbabwe's MIKE sites is well below that level. Moreover, national and international law requires the marking of ivory tusks taken as lawful hunting trophies, which clearly and visibly separates these lawful tusks from illegal ones.
- Photographic tourism is not a substitute in most hunting areas. Opponents argue that photographic tourism would be a better option than hunting. It is true that photo-tourism is available in some places; for example, some conservancies in Namibia benefit from photographic tourism revenues alone or a mixture of photo- and hunting tourism. But photo-tourism requires decent infrastructure and scenery, and dense enough wildlife populations to draw tourists. These may not be available in remote areas of a country without access to airports or other activities, and where the wildlife populations are not yet dense enough to ensure a sighting on a two-hour game drive. This is the situation in many CAMPFIRE Areas, where photographic tourism was tried ... and failed. In these areas, without the benefits of hunting, the habitat would be converted to agriculture and livestock. Benefits to the rural community stakeholders are less from photographic tourism than from tourist hunting.

Sincerely

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"Build a Legacy of Safety"

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Please Allow Elephant/Lion Imports to support conservation of the species

"Oropallo, Michael A." <MOropallo@barclaydamon.com>

From: "Oropallo, Michael A." <MOropallo@barclaydamon.com>
Sent: Tue Nov 21 2017 11:27:39 GMT-0700 (MST)
To: "(b) (6)" <[REDACTED]@fws.gov> <(b) (6)" <[REDACTED]@fws.gov>
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Conversation Contents

Elephant Imports

Terry Scott <terriscott1@me.com>

From: Terry Scott <terriscott1@me.com>
Sent: Tue Nov 21 2017 11:27:54 GMT-0700 (MST)
To: <exsec@ios.doi.gov>
CC: <(b) (6) @fws.gov>
Subject: Elephant Imports

Dear Secretary Zinke, and Director Sheehan, Please lift the restrictions for importation of Elephants. Not doing so causes harm and financial distress to many Africans, as well as likely the demise of the Elephant as they are so overpopulated in Zimbabwe that they are quite literally eating themselves out of house and home. Please don't listen to the press and political pundits, they have never been there to see for themselves as I have. Additionally Zimbabwe has done a fabulous job of documenting, and managing their Elephant herd. Who are we to take control of their hunting? We have no right to dictate hunting policy to their country via uninformed and liberal bias. I have been to Africa and seen the Elephants for myself if anything there are too many. Hwange National park which was determined to safely support 2000 Elephants in the 70's now has over 45,000. Please let good sense and judgement prevail.
Sincerely Terry Scott

Conversation Contents

Elephant Importation

samuel noble <samnoblejr@gmail.com>

From: samuel noble <samnoblejr@gmail.com>
Sent: Tue Nov 21 2017 11:26:15 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Elephant Importation

Mr, Sheehan,

November 21, 2017

Deputy Director Greg Sheehan: (b) (6) @fws.gov
Secretary Ryan Zinke: exsec@ios.doi.gov

TALKING POINTS IN SUPPORT OF ELEPHANT TROPHY IMPORTS FROM ZIMBABWE AND ZAMBIA

ELEPHANT TROPHY IMPORTS HAVE NEVER BEEN “BANNED,” AND THE POSITIVE ENHANCEMENT FINDINGS ARE BASED ON THE BEST AVAILABLE INFORMATION RECEIVED IN 2014-2016

- There has been no “ban” on elephant trophy imports. In April 2014, the U.S. Fish and Wildlife Service (FWS) “suspended” the import of elephant trophies from Zimbabwe due to a lack of information. Zimbabwe’s Parks and Wildlife Management Authority (ZPWMA) responded to two questionnaires from the FWS in April 2014 and December 2014. However, in March 2015, the FWS extended the suspension, finding information was still lacking. The negative enhancement finding dated March 2015 repeatedly affirmed, “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.” In July 2015, May 2016, and November 2016, ZPWMA responded to additional FWS questions. The November 2017 positive enhancement finding is based on these later responses and thousands of pages of supporting documents, including Zimbabwe’s National Elephant Management Action Plan, 2014 countrywide elephant population surveys, 2014-2016 actual and projected budget data, 2014 and 2015 offtakes and 2016 quota data, 2014-2016 CAMPFIRE data, and much more.
- Issuing import permits for elephant trophies from Zimbabwe was not a political decision by this Administration. In September 2016, before the election occurred, the FWS had already indicated to ZPWMA that the suspension would be lifted. ZPWMA was told by the Chief of Permits that the FWS needed “only one more piece of information,” a prioritization of the new Elephant Management Plan, before the negative enhancement finding could be reversed. That prioritization was provided on November 8, 2016, before the election results were in. At the end of 2016, the FWS should have made the positive enhancement finding, but was admittedly sidetracked by an influx of thousands of new permit applications due to the listing of rosewood (used extensively in musical instruments and furniture) on the CITES Appendixes effective

January 2017.

- Similarly, there has been no “ban” on the import of elephant trophies from Zambia. In October 2011, the FWS made a positive enhancement finding to authorize the import of regulated elephant hunting trophies from Zambia. However, 2013 and 2014, Zambia’s wildlife authority suspended hunting to obtain more current wildlife population information. In 2015, Zambia’s government lifted the hunting suspension, and set a conservative quota of 80 elephant. In August 2016, the Chief of Permits sent an email indicating that the FWS was trying to issue import permits for elephant trophies from Zambia before the CITES Conference of the Parties in September 2016, based on an April 2015 Non-Detriment and Enhancement Finding the FWS received from Zambia’s wildlife authority. However, the FWS ran out of time. At the Conference of the Parties, the Chief of Permits indicated that elephant permits from Zambia would likely issue before the end of the year. Again, because of the new rosewood permits, that enhancement finding was put on a back burner.

ZIMBABWE’S ELEPHANT POPULATION IS THE SECOND-LARGEST IN AFRICA

- In 1900, it was estimated that Zimbabwe had a national population of 4,000 elephant. Since then, the population has grown to over 82,000 (a twenty-fold increase). The current population is double the target national population established in the 1980s, almost 40% larger than in 1992, when the FWS determined to maintain the Endangered Species Act (ESA) “threatened” listing, and almost 20% larger than in 1997, when the last positive enhancement finding was made (before November 2017). Elephant sub-populations in Zimbabwe are generally considered stable or increasing.

- North-West Matabeleland: This population is estimated at 54,000, and is most densely located in Hwange National Park (45,000 elephant). In 1928, the estimated elephant population in Hwange was 2,000.
- Sebungwe: This population is estimated at 3,500 and has declined since 2001 due to human population expansion into a previously unsettled area. The human population exploded from 45,000 in 1950 to over 700,000 in 2013, which explains the decline in the elephant population. Due to the expansion of human settlement and unlike other major elephant ranges in Zimbabwe, the habitat in this area is fragmented.
- Mid-Zambezi Valley: This area has an estimated elephant population of about 12,000. That population declined since the 2001 countrywide survey, and it is believed the decline is due to cross-border poaching and perhaps, the cross-border movement of elephants during the survey. Anti-poaching is a major component of the Zambezi Valley/Mana Pools Regional Elephant Management Action Plan, and recently the area has been chosen as a CITES MIKES site with an ongoing project.
- South-East Lowveld: Most of this population inhabits Gonarezhou National Park, whose population has been growing consistently at 5% per annum over 20 years. This region’s sub-population is estimated at 13,000 elephant between the Park, surrounding communal areas, and nearby private conservancies.

ZAMBIA’S ELEPHANT POPULATION IS STABLE

- Zambia’s elephant population inhabits seven sub-regions covering National Parks and Game Management Areas. According to the 2016 African Elephant Status Report, Zambia’s elephant population is estimated at over 21,000. This is generally considered stable over the past 25 years, and is stable compared to Zambia’s population in 1992, when the FWS determined to maintain elephant as “threatened” listed. However, several population surveys indicating an estimate closer to 30,000 were not included in the 2016 African Elephant Status Report, and Zambia’s wildlife authority estimates the country’s population at more than 30,000.

ELEPHANT HUNTING OFFTAKES IN ZIMBABWE ARE SUSTAINABLE

- **Zimbabwe maintains a CITES export quota of 1,000 tusks from 500 bull elephants. A national quota of 500 elephants represents only 0.6% of a population of 82,630 elephant. Actual hunting offtakes are considerably lower, have a negligible impact on the overall population rate, and have declined in the past three years due to the import suspension.**

Average Hunting Offtakes 2010-2013 (% of Total Elephant Population): 228 (0.276%)

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- **In 2013 and 2014, Zambia suspended regulated tourist hunting to obtain a better sense of national wildlife population trends. In 2015, Zambia set a conservative export quota of 160 tusks from 80 bull elephants. Zambia maintained the quota of 80 elephants in 2016 and 2017. A national quota of 80 elephants represents less than 0.4% of a population of 21,967 elephant. Actual hunting offtakes are negligible and have no impact on the national population rate.**

2015 Hunting Offtakes (% of Total Elephant Population): 03 (0.014%)

2016 Hunting Offtakes (% of Total Elephant Population): 12 (0.055%)

ELEPHANT MANAGEMENT IN ZIMBABWE IS GUIDED BY APPROPRIATE LEGISLATION AND A STATE-OF-THE-ART MANAGEMENT PLAN

- **Governing Law: The Zimbabwe Parks and Wild Life Act provides the regulatory mechanism for ZPWMA and its programs. The Act created ZPWMA as a parastatal authority apart from the central government and established a separate fund, apart from the Central Treasury, to sustain ZPWMA's operations. The Act sets harsh penalties for elephant-related offenses, and was amended in 2010 to impose a nine-year minimum sentence for the first offense of elephant poaching. Under the Parks and Wild Life Act, Rural District Councils and other land holders are granted "appropriate authority" to benefit directly from wildlife. Under this legislation, land holders are encouraged to maintain and increase wildlife populations because they retain the benefits of sustainable use of that wildlife.**

- **Elephant Management Plan: Elephant are managed according to the Zimbabwe National Elephant Management Plan (2015-2020). The plan incorporates specific action items, deliverables, deadlines, and responsible parties. It is an adaptive management plan utilizing prioritization of targets measured by key components, strategic objectives, and outputs. The plan focuses on five major components: Protection and Law Enforcement; Biological Monitoring and Management; Social, Economic, and Cultural Framework; Building Conservation Capacity; and Program Management. The National management plan is supplemented by four regional plans that utilize the same framework to address the unique challenges for each major elephant range in Zimbabwe. Zimbabwe's elephant management planning process was kicked off by the FWS' elephant trophy import suspension. ZPWMA held a year of stakeholder planning workshops, including a preparatory meeting of representatives from CAMPFIRE in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley range) in March-April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning**

workshop in the South East Lowveld range in September 2015.

ELEPHANT HUNTING IN ZIMBABWE GENERATES CONSERVATION BENEFITS THAT SATISFY THE “ENHANCEMENT” STANDARD: Although hunting offtakes are negligible, elephant hunting fees create extensive conservation incentives in Zimbabwe.

- **Habitat:** Hunting areas in Zimbabwe represent ~130,000 km² of protected habitat. This represents over four times the size of Zimbabwe’s National Parks (~28,000 km²). Healthy elephant populations require large tracts of habitat; the areas set aside for regulated hunting are therefore essential to the elephant’s continued survival.
- **Management and Enforcement Revenues:** Revenues generated from tourist hunting conducted on state lands comprised approximately 20% of ZPWMA’s revenue stream in 2014. Over \$6.2 million in trophy fees came from elephant hunts, with \$5 million accruing to ZPWMA to reinvest in elephant protection and species management. Over 50% of that revenue came from U.S. clients. Almost 80% of ZPWMA’s operating budget is allocated towards law enforcement in the form of staff costs and patrol provisions. ZPWMA employs 1,500 active field rangers. Put simply, hunting revenues support anti-poaching efforts across Zimbabwe’s elephant range—and this is largely paid for by American elephant hunters.
- **Operator Anti-Poaching:** In addition to supporting ZPWMA’s enforcement capacity, hunting operators deploy their own anti-poaching units to police the Safari Areas and fund community game scouts in CAMPFIRE Areas. For example, a small sample of 14 individual operators surveyed by the Safari Operator Association of Zimbabwe spend \$957,843 on anti-poaching in 2013 and deployed 245 anti-poaching scouts. One specific operator, Charlton McCullum Safaris (CMS) in the Dande Safari Area and Mbire Communal Area, spends on average \$80,000-\$90,000 in patrol and equipment costs and anti-poaching rewards. From 2010 to 2016, CMS’ efforts led to an 82% decline in elephant poaching in an import border region. As another example, the Save Valley and Buby Valley Conservancies together spend over \$1 million on anti-poaching each year. These anti-poaching efforts are funded predominately by hunting revenue, and protect stable populations of elephant and the third-largest black rhino population in the world.
- **Regional Anti-Poaching:** According to the CITES “Monitoring the Illegal Killing of Elephants” (MIKE) program, poaching in the Southern African countries that allow regulated tourist hunting, including Zimbabwe, is lower than anywhere else on the continent and has never reached an unsustainable level. This stands in stark contrast to the West and Central African countries that do not rely upon tourist hunting as a conservation tool.
- **Community Benefits:** Zimbabwe’s CAMPFIRE program is the pioneering community-based natural resource management program in Africa. The program allows rural communities to financially benefit from wildlife, thereby incentivizing the use of communal land as wildlife habitat, and the protection of wildlife in the form of increased tolerance of destructive wildlife. An estimated 77,000 households rely on CAMPFIRE benefit from CAMPFIRE. 90% of CAMPFIRE revenue is generated from regulated hunting, and 70% of this comes from elephant hunting. Thus, prior to the import suspension, elephant hunting generated over \$1.6 million per year for CAMPFIRE communities and was reinvested in the construction of classrooms and clinics, the installation of water infrastructure and solar powered facilities, the purchase of vehicles for anti-poaching support, compensation for destruction of crops or livestock by dangerous game, and other benefits that improve the livelihoods of the rural communities living in CAMPFIRE Areas. These benefits offset the damage caused by game species: from 2010 to 2015, elephant destroyed 7,495 hectares of crop fields in CAMPFIRE communities and claimed the lives of approximately 40 people.

ELEPHANT MANAGEMENT IN ZAMBIA IS UP-TO-DATE AND GENERATES SUBSTANTIAL BENEFITS TO ENCOURAGE RECOVERY OF THE SPECIES

- **Governing Law:** The **Zambian Wildlife Act No. 14 of 2015** is the guiding legislation for elephant protection and management. This cutting-edge law consolidated the prior wildlife authority into a government Department of National Parks and Wildlife (DNPW), to address the funding concerns and shortfalls experienced by the prior authority. DNPW is made up of a Wildlife Law Enforcement Unit with over 1,250 rangers; a Conservation Unit; an Infrastructure Development Unit; and a Community-Based Natural Resource Management Unit to oversee the development of conservation planning in Game Management Areas.

- **Management and Enforcement Revenues:** Between 2010 and 2012, regulated hunting revenues accounted for approximately 32% of the operating budget funding for Zambia's wildlife authority. With a potential to generate nearly \$1 million in elephant hunting fees, in 2015 and 2016, these fees totaled only \$150,000, due mainly to import restrictions. This amount was divided between DNPW and the Community Resource Boards in Game Management Areas (GMA). DNPW uses this revenue for range salaries and resource protection, as well as management surveys, staff training, and other activities. Approximately 75% of DNPW's expenditures are for anti-poaching, and Zambia's Wildlife Law Enforcement Unit conducted over 10,500 anti-poaching patrols in 2015, involving an average of 5,878 staff per quarter and 237,028 patrol days.

- **Habitat:** Hunting areas in Zambia (~180,000 km²) provide almost three times the amount of protected habitat compared to the country's National Parks (~64,000 km²).

- **Community Benefits:** In GMAs, elephant license fees are divided equally between the DNPW and the GMA's Community Resource Board, and 20% of concession fees also accrue to the Board. In 2015 and 2016, approximately \$1.36 million in hunting fees was distributed to the Boards, as well as \$10,000 per concession paid by the hunting operator. Under the new Wildlife Law, Boards must invest those funds as follows: 45% towards wildlife protection and patrols, 35% towards community improvement projects such as construction of schools, clinics, and water infrastructure, and 20% towards administrative costs. Written concession agreements between the operators, DNPW, and the community Boards usually obligate the concessionaire to make further communities investments, such as constructing a classroom and paying a teacher's salary. Operators in 13 blocks were obligated to spend over \$1.1 million in community infrastructure development and 3.4 million in community lease and other payments for the duration of their leases.

- **Game Meat Distributions:** Moreover, under Zambian law, at least 50% of harvested game meat must be donated and distributed to local communities. A 2015 study found that operators in three GMAs contributed an average of 6,000 kilograms of harvested meat per season, and estimated that operators across all GMAs could provide ~130 tons of much-needed protein annually. This reduces the incentive for bush meat poaching in these areas bordering and buffering Zambia's National Parks.

- **Operator Anti-Poaching:** Hunting operators' concession agreements with DNPW and the Community Resource Board identify mandatory anti-poaching obligations and expenditures. At present, 75 Boards employ over 750 wildlife scouts and 79 support personnel, at a monthly cost of over \$38,800. Those scouts are paid for by revenues from tourist hunting. A small sample of four operators spent over \$201,000 on anti-poaching in 2015, to fund community scouts and fund and equip their own operator anti-poaching teams. This anti-poaching support is largely paid for by U.S. hunters, as over half of all hunting clients in Zambia are from the U.S.

[**Note:** Supporting documents for each of these points is available by contacting Conservation Force, cf@conservationforce.org. These Talking Points largely rely on the responses of ZPWMA and DNPW to FWS information requests and supporting documents provided as part of those responses as well as individual hunting operator enhancement reports, reports of the CAMPFIRE Association, and publicly available IUCN documents.]

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Samuel E. Noble, Jr., B.S., B.A., J.D.

Noble LLC

Noble Trucking LLC

Noble Logistics LLC

Elbon Farms LLC

Conversation Contents

Zimbabwe

Attachments:

/83. Zimbabwe/1.1 image001.gif

Chad Arnette <chad.arnette@kellyhart.com>

From: Chad Arnette <chad.arnette@kellyhart.com>
Sent: Tue Nov 21 2017 11:11:53 GMT-0700 (MST)
To: "(b) (6) [REDACTED]@fws.gov" <(b) (6) [REDACTED]@fws.gov>, "exsec@ios.doi.gov" <exsec@ios.doi.gov>
Subject: Zimbabwe
Attachments: image001.gif

Deputy Director Sheehan and Secretary Zinke:

I, along with other informed sportsman, am dismayed at comments made by President Trump in the last few days regarding the importation of lion and elephant trophies from Zimbabwe. President Trump is clearly uninformed and has been incredibly irresponsible in his commentary. Below are the facts. To the extent President Trump maintains his current, uninformed position, and to the extent the FWS follows suit, he will undoubtedly harm the very wildlife he purports to protect. And he will certainly no longer have my support in any of his endeavors. Thank you for considering the below information.

Chad Arnette
Partner

Description:
Description: Kelly
201 MAIN STREET, SUITE 2500
FORT WORTH, TEXAS 76102
TELEPHONE (817) 878-3561
FAX (817) 878-9761
chad.arnette@kellyhart.com
www.kellyhart.com

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ELEPHANT MANAGEMENT IN ZAMBIA IS UP-TO-DATE AND GENERATES SUBSTANTIAL BENEFITS TO ENCOURAGE RECOVERY OF THE SPECIES

- **Governing Law:** The Zambian Wildlife Act No. 14 of 2015 is the guiding legislation for elephant protection and management. This cutting-edge law consolidated the prior wildlife authority into a government Department of National Parks and Wildlife (DNPW), to address the funding concerns and shortfalls experienced by the prior authority. DNPW is made up of a Wildlife Law Enforcement Unit with over 1,250 rangers; a Conservation Unit; an Infrastructure Development Unit; and a Community-Based Natural Resource Management Unit to oversee the development of conservation planning in Game Management Areas.
- **Management and Enforcement Revenues:** Between 2010 and 2012, regulated hunting revenues accounted for approximately 32% of the operating budget funding for Zambia's wildlife authority. With a potential to generate nearly \$1 million in elephant hunting fees, in 2015 and 2016, these fees totaled only \$150,000, due mainly to import restrictions. This amount was divided between DNPW and the Community Resource Boards in Game Management Areas (GMA). DNPW uses this revenue for range salaries and resource protection, as well as management surveys, staff training, and other activities. Approximately 75% of DNPW's expenditures are for anti-poaching, and Zambia's Wildlife Law Enforcement Unit conducted over 10,500 anti-poaching patrols in 2015, involving an average of 5,878 staff per quarter and 237,028 patrol days.
- **Habitat:** Hunting areas in Zambia (~180,000 km²) provide almost three times the amount of protected habitat compared to the country's National Parks (~64,000 km²).
- **Community Benefits:** In GMAs, elephant license fees are divided equally between the DNPW and the GMA's Community Resource Board, and 20% of concession fees also accrue to the Board. In 2015 and 2016, approximately \$1.36 million in hunting fees was distributed to the Boards, as well as \$10,000 per concession paid by the hunting operator. Under the new Wildlife Law, Boards must invest those funds as follows: 45% towards wildlife protection and patrols, 35% towards community improvement projects such as construction of schools, clinics, and water infrastructure, and 20% towards administrative costs. Written concession agreements between the operators, DNPW, and the community Boards usually obligate the concessionaire

to make further communities investments, such as constructing a classroom and paying a teacher's salary. Operators in 13 blocks were obligated to spend over \$1.1 million in community infrastructure development and 3.4 million in community lease and other payments for the duration of their leases.

- **Game Meat Distributions:** Moreover, under Zambian law, at least 50% of harvested game meat must be donated and distributed to local communities. A 2015 study found that operators in three GMAs contributed an average of 6,000 kilograms of harvested meat per season, and estimated that operators across all GMAs could provide ~130 tons of much-needed protein annually. This reduces the incentive for bush meat poaching in these areas bordering and buffering Zambia's National Parks.
- **Operator Anti-Poaching:** Hunting operators' concession agreements with DNPW and the Community Resource Board identify mandatory anti-poaching obligations and expenditures. At present, 75 Boards employ over 750 wildlife scouts and 79 support personnel, at a monthly cost of over \$38,800. Those scouts are paid for by revenues from tourist hunting. A small sample of four operators spent over \$201,000 on anti-poaching in 2015, to fund community scouts and fund and equip their own operator anti-poaching teams. This anti-poaching support is largely paid for by U.S. hunters, as over half of all hunting clients in Zambia are from the U.S.

[**Note:** Supporting documents for each of these points is available by contacting Conservation Force, cf@conservationforce.org. These Talking Points largely rely on the responses of ZPWMA and DNPW to FWS information requests and supporting documents provided as part of those responses as well as individual hunting operator enhancement reports, reports of the CAMPFIRE Association, and publicly available IUCN documents.]

MINI-ARGUMENTS REFUTING FALSE FACTS

- **There has never been a “ban” on elephant trophy imports from Zimbabwe.** A negative enhancement finding was made in April 2014 that “suspended” the import of elephant trophies. The FWS' negative 2015 enhancement finding stated repeatedly that once additional information was received, the negative finding would be reviewed and reversed (e.g., “The suspension ... could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available, including utilization of revenue generated through sport-hunting by U.S. hunters, which satisfies the conditions of the 4(d) special rule under the ESA.”) A “ban” suggests a permanent prohibition; a “suspension” is a “temporary abrogation or withholding.” Zimbabwe's elephant trophy imports were suspended.
- **Lifting of the suspension was not a political decision.** The decision should have been made in July 2015, when ZPWMA provided extensive additional documentation in response to a FWS questionnaire. The FWS requested “one more piece of information” at the CITES Conference of the Parties in September 2016. That information was provided in November 2016. No further information was needed, or requested. If the FWS had properly prioritized the issuance of elephant import permits—as they told ZPWMA they would at the CITES Conference of the Parties—the positive enhancement finding would have been made and these permits would have issued before the current Administration was in office.
- **The import of elephant trophies from Zimbabwe should not have been suspended in the first place.** In April 2014, the FWS announced the suspension based on an asserted “lack of information.” In contradiction to CITES Res. Conf. 6.7's recommendation of notifying and consulting with range states before imposing stricter domestic measures, and the Endangered Species Act's requirement of “encouraging foreign conservation programs,” 16 U.S.C. § 1537(b), the FWS shut down imports under an April 2014 negative enhancement finding that the FWS later admitted was wrong with respect to Zimbabwe's elephant population and level of poaching. In fact, the correct estimate for Zimbabwe's elephant population—almost 83,000—is 16,000 elephant higher than when the last, positive enhancement finding was made in 1997. That estimate is double the size of the elephant populations of Namibia and South Africa put together, yet the FWS maintains positive enhancement findings for the import of elephant trophies from Namibia and South Africa. The trophy import suspension was based on a mistaken concern that Zimbabwe's elephant population had declined, and the FWS should have admitted the mistake and reversed the suspension immediately. The failure to do so suggests a political motivation, not a scientific one.
- **Zimbabwe's elephant population is not “the worst managed,” but is among the best.** That Zimbabwe maintains a stable elephant population of over 83,000, despite a despotic

government, poor economy, and exploding human population growth rate, is a testament to the country's strong management. That number is almost 40% higher than in 1992, when the FWS confirmed the "threatened" listing of elephant, and almost 20% higher than in 1997, when the FWS made a positive enhancement finding authorizing the import of elephant trophies. This is due in part to ZPWMA being a parastatal separate and separately funded from the central government. It is also due to the commitment of Zimbabwe's citizens to maintaining their elephant, notwithstanding the costs—over 40 rural Zimbabweans were killed by elephant from 2010 to 2015. Zimbabwe's strong wildlife management is also demonstrated by recent IUCN Red List assessments of lion and giraffe, which indicated increasing populations of these species in Zimbabwe. The evidence demonstrates that Zimbabwe's wildlife management, not only its elephant management, is succeeding.]

- **Zimbabwe's elephant management is not "poor"; it is state-of-the-art and written by one of the world's foremost elephant experts.** In response to the April 2014 suspension of elephant trophy imports, ZPWMA took to heart the FWS' criticism that Zimbabwe's then-current elephant management plan dated to 1997. Although that plan was adaptively implemented and monitored, it was admittedly dated. Zimbabwe immediately began the process of adopting a brand-new, state-of-the-art elephant management plan—basically, to satisfy the FWS. This included a year of stakeholder planning workshops: a preparatory meeting of representatives from Zimbabwe's community-based natural resources management program, CAMPFIRE, in November 2014; a national elephant management planning workshop in December 2014; an elephant management planning and anti-poaching workshop in Mana Pools (Zambezi Valley) in early April 2015; an elephant management planning workshop in the Sebungwe range in May 2015; and an elephant management planning workshop in the South East Lowveld region in September 2015. Zimbabwe focused on regional planning because the four regions face different management challenges. Each planning workshop produced a regional elephant management plan that was incorporated into the final. The final document was drafted by a leading elephant scientist, and the process was monitored throughout by the IUCN's African Elephant Specialist Group.
- **Regulated hunting is not poaching.** By definition, "regulated" hunting is regulated and lawful. It is carefully monitored by ZPWMA, and offtakes are recorded in a national database. Lawfully hunted ivory tusks are marked to show that they are lawful and note the year of harvest. Moreover, regulated hunting revenues underwrite most anti-poaching expenses in Zimbabwe and the rest of Southern Africa, either by fees paid to government wildlife authorities that are used for law enforcement, or by operator-funded teams that patrol concessions and keep poachers out. Finally, revenue-sharing and contributions by hunting operators creates conservation incentives for rural communities most affected by wildlife, which disincentivizes poaching. For example, Zimbabwe's CAMPFIRE communities were receiving over \$1.6 million per year in revenues from elephant hunting prior to the import suspension. These funds allow for clinics and schools to be built, teachers' salaries to be paid, boreholes to be drilled, and so on. Hunting operators in Zambia are required to share at least 50% of harvested meat with rural communities. Many tons of meat can come from elephant hunts, to reduce the need and tolerance for bushmeat poaching and protect species in addition to elephant.
- **Allowing imports of elephant trophies will not damage the government's efforts to control ivory trafficking.** Elephant trophy imports have been authorized for Namibia and South Africa for the past three years, which demonstrates that a country may maintain lawful hunting and low poaching at the same time. In fact, according to the CITES MIKE data, the Southern African countries that depend upon regulated hunting as a conservation tool have the lowest Proportion of Illegally Killed Elephant (PIKE) rates in the world. PIKE, which is used to assess whether poaching levels are unsustainable, has never risen above the sustainability threshold in Southern Africa. PIKE at Zimbabwe's MIKE sites is well below that level. Moreover, national and international law requires the marking of ivory tusks taken as lawful hunting trophies, which clearly and visibly separates these lawful tusks from illegal ones.
- **Photographic tourism is not a substitute in most hunting areas.** Opponents argue that photographic tourism would be a better option than hunting. It is true that photo-tourism is available in some places; for example, some conservancies in Namibia benefit from photographic tourism revenues alone or a mixture of photo- and hunting tourism. But photo-tourism requires decent infrastructure and scenery, and dense enough wildlife populations to draw tourists. These may not be available in remote areas of a country without access to airports or other activities, and where the wildlife populations are not yet dense enough to ensure a sighting on a two-hour game drive. This is the situation in many CAMPFIRE Areas, where photographic tourism was tried ... and failed. In these areas, without the benefits of hunting, the habitat would be converted to agriculture and livestock. Benefits to the rural community stakeholders are less from photographic tourism than from tourist hunting.

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Conversation Contents

Fwd: Lifting of elephant trophy suspension by USFWS

Rose Mandisodza-Chikerema <mandisodzar@gmail.com>

From: Rose Mandisodza-Chikerema <mandisodzar@gmail.com>
Sent: Mon Nov 20 2017 03:52:51 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Subject: Fwd: Lifting of elephant trophy suspension by USFWS

----- Forwarded message -----

From: Rose Mandisodza-Chikerema <mandisodzar@gmail.com>
Date: 20 November 2017 at 12:50
Subject: Lifting of elephant trophy suspension by USFWS
To: <(b) (6) @fws.org>
Cc: Regina Lennox <regina.lennox@conservationforce.org>, Fulton Mangwanyana <fmangwanyana@zimparks.org.zw>, Geofreys Matipano <gmatipano@zimparks.org.zw>, Patience Gandiwa <patience.gandiwa@gmail.com>, John Jackson <jjjiii@att.net>, Marco Pani <pani.marco@gmail.com>

Dear Greg,

I hope this email finds you well and you had has a safe trip back home. It was good to see you. This communication is additional information to the several discussions that we had in Tanzania. The Zimbabwe Government had a meeting with Dan Ashe of USFWS at the CITES CoP 17 in Johannesburg, South Africa.

During the meeting USFWS highlighted that they need two additional documents for them to make a decision on the elephant trophy suspension. The additional information/documents was on prioritization of activities and implementation of the elephant management plan and the second document was on community benefits from elephant trophy hunting. All these documents were submitted within the agreed time frame, but we did not get any response. The Zimbabwe delegation understood that once this information was sent to the USFWS we will certainly get a positive response on the suspension of import of elephant trophies into the US.

Let us know if you need any additional information from Zimbabwe on elephants. In the meantime i will share a video with Zimbabwe elephant facts via WhatsApp. **Please bear in mind that the elephant off take in Zimbabwe is negligible in biological terms. How can the harvest of 100 elephants endanger a population of 83 000? This low off take generate crucial revenue for livelihoods of poorest if the poor in the country and conservation work for the government.**

Kind wishes

Rose

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*Mrs Mandisodza-Chikerema R. L

“If you wait for perfect conditions, you’ll never get anything done!” (Ecclesiastes 11:4).

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Rose Mandisodza-Chikerema <mandisodzar@gmail.com>

From: Rose Mandisodza-Chikerema <mandisodzar@gmail.com>
Sent: Mon Nov 20 2017 05:28:13 GMT-0700 (MST)
To: <(b) (6) @fws.gov>
Regina Lennox <regina.lennox@conservationforce.org>, John Jackson <jjjiii@att.net>, Marco Pani <pani.marco@gmail.com>, **CC:** Fulton Mangwanya <fmangwanya@zimparks.org.zw>, Geofreys Matipano <gmatipano@zimparks.org.zw>, Patience Gandiwa <patience.gandiwa@gmail.com>
Subject: Fwd: Lifting of elephant trophy suspension by USFWS

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Conversation Contents

Fwd: 1990s elephant population

John Jackson <jjjiii@att.net>

From: John Jackson <jjjiii@att.net>
Sent: Sun Nov 19 2017 15:05:41 GMT-0700 (MST)
To: Greg Sheehan <(b) (6) @fws.gov>
CC: Regina Lennox <regina.lennox@conservationforce.org>, <matt.boguslawski@conservationforce.org>
Subject: Fwd: 1990s elephant population

Greg, note this quote from the last FWS Zim enhancement finding in 1997. The population since then has increased from 1995 to today from 66 k to 82 k!

Sent from my iPad

Begin forwarded message:

From: "matt.boguslawski@conservationforce.org matt.boguslawski@conservationforce.org" <matt.boguslawski@conservationforce.org>
Date: November 19, 2017 at 11:45:25 PM GMT+2
To: jjjiii <jjjiii@att.net>
Subject: 1990s elephant population
Reply-To: "matt.boguslawski@conservationforce.org matt.boguslawski@conservationforce.org" <matt.boguslawski@conservationforce.org>

From 1997 Positive Enhancement Finding

"Zimbabwe's elephant population was estimated at approximately 46,000 elephant in 1980. The current estimates from 1995 indicate the population in Zimbabwe stands at approximately 66,000. This represent a population growth of about 5% per annum."

Matt Boguslawski
Conservation Force
3240 S I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA
(847) 372 8390 (cell)
matt.boguslawski@conservationforce.org

Conversation Contents

FW: Botswana hunting ban study

Attachments:

/159. FW: Botswana hunting ban study/1.1 Mbaiwa (2017). Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana (1).pdf

"Seidman, Anna" <aseidman@safariclub.org>

From: "Seidman, Anna" <aseidman@safariclub.org>
Sent: Mon Sep 04 2017 12:49:33 GMT-0600 (MDT)
To: "(b) (6)" <(b) (6)@fws.gov> <(b) (6)@fws.gov>
Subject: FW: Botswana hunting ban study
Attachments: Mbaiwa (2017). Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana (1).pdf

Greg: Attached is a published article written by a researcher in Botswana that describes the harmful consequences of the shutdown of hunting in Botswana. Anna Anna M. Seidman Director of Litigation Director of Government Affairs Safari Club International 501 2nd Street NE Washington, D.C. 20002 202-543-8733
aseidman@safariclub.org<mailto:aseidman@safariclub.org> "Nothing in the world can take the place of persistence. Talent will not; nothing is more common than unsuccessful men with talent. Genius will not; unrewarded genius is almost a proverb. Education will not; the world is full of educated derelicts. Persistence and determination alone are omnipotent. The slogan 'Press On' has solved and always will solve the problems of the human race." Calvin Coolidge
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Greg Sheehan <greg_j_sheehan@fws.gov>

From: Greg Sheehan <(b) (6)@fws.gov>
Sent: Mon Sep 04 2017 13:32:04 GMT-0600 (MDT)
To: "Seidman, Anna" <aseidman@safariclub.org>
Subject: Re: Botswana hunting ban study

Thank you Anna. I will take a look at it now. Greg Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Sep 4, 2017, at 2:53 PM, Seidman, Anna <aseidman@safariclub.org> wrote: > > Greg: > > Attached is a published article written by a researcher in Botswana that describes the harmful consequences of the shutdown of hunting in Botswana. > > Anna > Anna M. Seidman > Director of Litigation > Director of Government Affairs > Safari Club International > 501 2nd Street NE > Washington, D.C. 20002 > 202-543-8733 > aseidman@safariclub.org<mailto:aseidman@safariclub.org> > > > "Nothing

in the world can take the place of persistence. Talent will not; nothing is more common than unsuccessful men with talent. Genius will not; unrewarded genius is almost a proverb. Education will not; the world is full of educated derelicts. Persistence and determination alone are omnipotent. The slogan 'Press On' has solved and always will solve the problems of the human race." > > > Calvin Coolidge > > > This transmittal may be a confidential attorney-client communication or may otherwise be privileged or confidential. If you are not the intended recipient, you are hereby notified that you have received this transmittal in error. Any review, dissemination, distribution or copying of the contents of this e-mail is strictly prohibited. If you have received this e-mail in error, please notify us immediately. > >

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